



**FINAL ADMINISTRATIVE DECISION  
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Doreen Taylor  
DOCKET NO.: 16-03468.001-I-1  
PARCEL NO.: 14-16-205-054

The parties of record before the Property Tax Appeal Board are Doreen Taylor, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Lake Forest, and the Lake County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** in the assessment of the property as established by the **Lake** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$17,834  
**IMPR.:** \$125,892  
**TOTAL:** \$143,726

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Lake County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2016 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

**Findings of Fact**

The subject property consists of a single industrial condominium unit containing 5,217 square feet of building area which was constructed in 2006. The property has an 18,534 square foot site and is located in Lake Zurich, Ela Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales located in Lake Zurich. The comparable condominium units have land sizes ranging from 11,925 to 222,465 square feet. The industrial condominium units were built between 1995 and 2003 and range in size from 2,040 to 3,348 square feet of building area. The comparables sold between December 2015 and August 2016 for prices ranging from \$159,500 to \$262,500 or from \$74.07 to \$87.50 per square foot of building area.

In addition, the appellant argued that the four sales have a median sales price of \$79.26 per square foot of building area. However, three of the four comparables have much larger lots than the subject property. Furthermore, the appellant reported that the subject is "for sale as a pocket listing"; this was described as a situation where real estate professionals have been told the property is for sale and can bring potential clients to view the assets, but the "listing is not public knowledge." The appellant contends this pocket listing has been available for more than a year with an asking price of \$425,000 and no offers had been made as of the appeal submission in March 2017.

Based on the foregoing evidence, the appellant requested a market value for the subject property of \$79.26 per square foot.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$143,726. The subject's assessment reflects a market value of \$433,432 or \$83.08 per square foot of building area, land included, when using the 2016 three year average median level of assessment for Lake County of 33.16% as determined by the Illinois Department of Revenue.

In response to the appellant's evidence, the board of review asserted there were errors in the appellant's comparables #1, #2 and #4 in terms of land size when compared to the public record. Additionally, the board of review contends the age and building size of comparable #4 were also in error resulting in a sale price per square foot of \$98.31 and provided property record cards to support the corrections. The appellant did not file any rebuttal to dispute the data. Therefore, based on the corrections, the appellant comparable parcels range in size from 7,486 to 13,985 square feet of land area.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales of industrial condominium units that were located within .64 of a mile of the subject. Board of review comparables #1 and #4 are the same properties as appellant comparables #4 and #3, respectively. The two new comparable properties presented by the board of review were built in 1990 and 2006, respectively. These two comparables have lot sizes of 17,580 and 25,574 square feet of land area which have been improved with 6,440 and 5,690 square foot condominium units, respectively. These two sales occurred in August 2016 and September 2014 for prices of \$539,000 and \$540,000 or for \$83.70 and \$94.90 per square foot of building area, including land.

Based on this evidence and argument, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of six comparable sales to support their respective positions before the Property Tax Appeal Board, with two common comparables. The Board has given reduced weight to the appellant's comparables and board of review comparables #1 and #4 as each of these units are significantly smaller than the subject unit that contains 5,217 square feet of building area

The Board finds the best evidence of market value to be board of review comparable sales #2 and #3. These two comparables sold in August 2016 and September 2014 for prices of \$539,000 and \$540,000 or for \$83.70 and \$94.90 per square foot of building area. The subject's assessment reflects a market value of \$433,432 or \$83.08 per square foot of building area, including land, which is below the best comparable sales in this record. After considering adjustments and the differences in the best suggested comparables when compared to the subject property, the Board finds a reduction in the subject's assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.

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Chairman



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Member

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Member



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Member

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Member

DISSENTING: \_\_\_\_\_

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: December 23, 2019



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Clerk of the Property Tax Appeal Board

**IMPORTANT NOTICE**

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Doreen Taylor, by attorney:  
Ronald Kingsley  
Lake County Real Estate Tax Appeal, LLC  
13975 W. Polo Trail Drive  
#201  
Lake Forest, IL 60045

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085