



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

APPELLANT: Aleksey Piskunov  
DOCKET NO.: 17-00984.001-R-1  
PARCEL NO.: 15-20-305-021

The parties of record before the Property Tax Appeal Board are Aleksey Piskunov, the appellant, by Thomas M. Battista, of the Law Offices of Thomas M. Battista in Chicago; 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:** \$45,372  
**IMPR.:** \$157,107  
**TOTAL:** \$202,479

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 2017 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 two-story, wood-sided, single-family dwelling with 2,900 square feet of living area. The dwelling is a 525 Model home and was constructed in 1996. The home features a 1,547-square foot basement with 1,160 square feet of finished area, central air-conditioning, a fireplace and a 620-square foot garage. The dwelling has 2.1 bathrooms. The dwelling is located in Vernon Township, Lake County.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located in close proximity to the subject. The comparables consist of two-story, wood-sided, single-family dwellings that were built in 1995 or 1997. The dwellings range in size from 2,736 to 3,196 square feet of living area and each features a full basement, one with finished area, and a garage containing 639 to 682 square feet of building area. Three of the comparables have one or two

fireplaces. The dwellings have 2.1 or 3.1 bathrooms. The comparables have improvement assessments ranging from \$126,658 to \$155,086 or from \$45.45 to \$48.52 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$202,479. The subject property has an improvement assessment of \$157,107 or \$54.17 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on six equity comparables located in close proximity to the subject. The comparables consist of two-story, wood-sided, single-family dwellings that were built in 1996 or 1997. The dwellings each contain 2,900 square feet of living area. Each dwelling has a 1,547 square foot basement with 765 to 1,290 square feet of finished area, central air-conditioning, a fireplace, 3.1 bathrooms, and a 620-square foot garage. Comparable #3 also features a 417-square foot enclosed frame porch. The grid analysis notes that the subject and all six comparables are 525 Model homes. The comparables have improvement assessments ranging from \$158,910 to \$163,413 or from \$54.80 to \$56.35 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 presented data on ten suggested comparables for the Board's consideration. The Board gave less weight to appellant's comparables #2, #3 and #4 which all have unfinished basements, dissimilar to the subject. The Board also gave less weight to board of review comparable #3 due to its large enclosed frame porch, dissimilar to the subject.

The Board find that the parties' remaining comparables are similar to the subject in age, design, location, size, model, and most features, although each comparable has an additional full bathroom when compared to the subject. These comparables had improvement assessments ranging from \$48.52 to \$55.02 per square foot of living area. The subject's improvement assessment of \$54.17 per square foot of living area falls within the range established by the best comparables in this record.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill.2d 395 (1960). Although the comparables presented by the

parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which exists on the basis of the evidence.

Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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.



Chairman



Member



Member



Member



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: June 16, 2020



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

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