



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

APPELLANT: Kurt and Cynthia Galisdorfer
DOCKET NO.: 17-01911.001-R-1
PARCEL NO.: 11-29-204-033

The parties of record before the Property Tax Appeal Board are Kurt and Cynthia Galisdorfer, the appellants, 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: \$70,205
IMPR.: \$201,469
TOTAL: \$271,674

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 dwelling of wood-siding exterior containing 4,691 square feet of living area. The dwelling was constructed in 1999. Features of the home include an unfinished basement, central air conditioning, a fireplace and a 726-square foot garage. The property has a 16,241 square foot site and is located in Vernon Hills, Libertyville Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted information on five comparable sales located from .12 to .65 of a mile from the subject; one property was located within the same assessment neighborhood code as the subject property. The properties are improved with two-story dwellings with brick exterior construction that range in size from 4,078 to 4,983 square feet of living area. The dwellings were constructed from 1999 to 2010. Each comparable has an unfinished basement, central air

conditioning, one or three fireplaces and a garage ranging in size from 630 to 991 square feet of building area. The comparables have sites ranging in size from 12,070 to 21,294 square feet of land area. The sales occurred from January 2015 to March 2016 for prices ranging from \$646,500 to \$895,000 or from \$158.53 to \$179.61 per square foot of living area, including land. Based on this evidence, the appellants requested the subject's total assessment be reduced to \$251,334.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$271,674. The subject's assessment reflects a market value of \$819,529 or \$174.70 per square foot of living area, land included, when using the 2017 three-year average median level of assessment for Lake County of 33.15% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located from .085 to .748 of a mile from the subject, and within the same assessment neighborhood code as the subject property. The properties are improved with two-story dwellings of brick exterior construction that ranged in size from 3,118 to 3,534 square feet of living area. The dwellings were constructed from 1999 to 2004. Each comparable has an unfinished basement, central air conditioning, one or two fireplaces and a garage ranging in size from 546 to 707 square feet of building area. These properties have sites ranging in size from 13,230 to 14,203 square feet of land area. The properties sold from May 2016 to June 2017 for prices ranging from \$636,000 to \$687,000 or from \$179.97 to \$220.33 per square foot of living area, including land. The board of review also provided copies of the property record cards for the subject and each comparable. The board of review also reported an April 2018 sale of comparable #2 for \$687,500 or \$200.85 per square foot of living area, including land. Based on the foregoing evidence, the board of review requested confirmation of the subject's estimated market value as reflected by its assessment.

Conclusion of Law

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of eight comparable sales for the Board's consideration. The Board finds that neither parties' comparables are particularly similar to the subject in all aspects. The Board gave less weight to appellants' comparables based on their locations being outside of the subject's neighborhood code and/or their sale dates in 2015 being less proximate in time to the subject's January 1, 2017 assessment date and, therefore, less likely to reflect subject's estimated market value. The board of review comparables, on the other hand, are inferior to the subject in that they each have smaller dwelling and lot sizes when compared to the subject property which requires downward adjustments on price per square foot basis to these comparables to make them more equivalent to the subject based on economies of scale which holds that, all other factors being equal, as the size of a property increases, its per unit value decreases. Likewise, as

the size of a property decreases, its per unit value increases. However, the Board will analyze the evidence presented and make a determination of the subject's correct assessment regardless of the quality of the evidence from both parties.

The Board finds the best evidence of market value to be the board of review comparable sales based on being most similar to the subject in location, design, age, and features. These comparables also sold more proximate in time to the subject's assessment date. These comparables sold from May 2016 to April 2018 for prices ranging from \$636,000 to \$687,500 or from \$179.97 to \$220.33 per square foot of living area, including land. The subject's assessment reflects a market value of \$819,529 or \$174.70 per square foot of living area, land included, which is above the range established by the best comparables in this record on an overall value basis but appears to be supported given the subject's substantially larger dwelling size and somewhat larger lot size. Furthermore, the appellants did not offer any rebuttal evidence to critique the board of review submission. After considering adjustments to the best comparables in this record due to inferior dwelling and lot sizes when compared to the subject, the Board finds that the subject's estimated market value as reflected by its assessment is supported. Therefore, the Board finds that based on this evidence, the appellant did not demonstrate by a preponderance of the evidence that the subject was overvalued and, thus, no reduction in the subject's assessment is warranted.

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: April 21, 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

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

APPELLANT

Kurt and Cynthia Galisdorfer, 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