



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

APPELLANT: Laura Sherwood  
DOCKET NO.: 18-00618.001-R-1  
PARCEL NO.: 06-04-204-008

The parties of record before the Property Tax Appeal Board are Laura Sherwood, 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:** \$12,150  
**IMPR.:** \$56,241  
**TOTAL:** \$68,391

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 2018 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 is improved with a tri-level style dwelling of wood siding exterior construction containing 1,428 square feet of above ground living area. The dwelling was built in 1984. Features of the home include an unfinished basement, a 570 square foot lower level with 456 square feet of finished area, central air conditioning, one fireplace and an attached two-car garage with 484 square feet of building area. The property has a 10,567 square foot site and is located in Lake Villa, Lake Villa Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales located from .05 of a mile to 2.37 miles from the subject property. The comparables have sites that range in size from 7,405 to 11,743 square feet of land area. The comparables are improved with tri-level dwellings with wood siding exterior construction ranging in size from 1,150 to 1,500 square feet of above

ground living area. The dwellings were built from 1980 to 1997. Each comparable has an unfinished basement, a lower level that ranges in size from 576 to 840 square feet with finished area ranging in size from 461 to 672 square feet, central air conditioning and one or two fireplaces. Each comparable has an attached garage containing 440 square feet of building area with comparable #3 having a garage located in the basement. The sales occurred from January 2016 to May 2017 for prices ranging from \$145,000 to \$215,000 or from \$126.09 to \$145.83 per square foot of above ground living area, land included. The appellant requested the subject's assessment be reduced to \$63,302 reflecting a market value of approximately \$189,925 when using the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$68,391. The subject's assessment reflects a market value of \$206,744 or \$144.78 per square foot of above ground living area, land included, when using the 2018 three-year average median level of assessment for Lake County of 33.08% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review noted on a rebuttal grid analysis that the appellant's comparables #1 and #3 sold in January and May 2016 for prices of \$145.83 and \$143.33 per square foot of above ground living area, land included, respectively and the appellant's comparable #2 is located 2.37 miles from the subject.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located from .166 of a mile to 1.043 miles from the subject property. The comparables have sites that range in size from 6,293 to 11,034 square feet of land area. The comparables are improved with a split-level style dwelling and two, tri-level style dwellings of wood siding exterior construction ranging in size from 1,128 to 1,376 square feet of above ground living area. The dwellings were built from 1977 to 1986. Each comparable has a lower level that ranges in size from 550 to 616 square feet with finished area ranging in size from 440 to 493 square feet, central air conditioning, one fireplace and an attached garage that ranges in size from 418 to 576 square feet of building area. The sales occurred from May 2017 to April 2018 for prices of \$186,000 and \$195,000 or from \$135.17 to \$172.87 per square foot of above ground living area, land included. Based on this evidence, the board of review requested that the subject's assessment be sustained.

### **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 no reduction in the subject's assessment is warranted.

The parties submitted six comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparables #1 and #3 with sales that occurred in 2016 which are dated and less likely to be indicative of the subject's market value as of the January 1, 2018 assessment date. The Board also gave less weight to the appellant's comparable #2 due to its distant location

from the subject being more than two miles away. The Board gave reduced weight to board of review comparable #2 due to its dissimilar split-level style when compared to the subject's tri-level style.

The Board finds the best evidence of market value to be board of review comparables #1 and #3. These two comparables sold more proximate in time to the assessment date at issue and are similar to the subject in location, design and age, though they each have a smaller dwelling size and lack an unfinished basement. These comparables sold in April 2018 and May 2017 for prices of \$195,000 and \$186,000 or for \$172.87 and \$135.17 per square foot of above ground living area, including land. The subject's assessment reflects a market value of \$206,744 or \$144.78 per square foot of above ground living area, land included, which is higher in overall value but between the two most similar comparable sales contained in the record on a price per square foot basis. The subject's higher overall value appears to be well supported given its larger dwelling size and superior unfinished partial basement. After considering any necessary adjustments to the comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by the assessment is supported and 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: November 17, 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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