



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

APPELLANT: Peter Andrews
DOCKET NO.: 18-01595.001-R-1
PARCEL NO.: 15-06-305-133

The parties of record before the Property Tax Appeal Board are Peter Andrews, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge, 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: \$41,454
IMPR.: \$235,310
TOTAL: \$276,764

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 consists of a two-story single-family dwelling of brick exterior construction with 4,469 square feet of living area. The dwelling was constructed in 2014. Features of the home include a full basement with 1,730 square feet of finished area, central air conditioning, a fireplace and an attached three-car garage of 858 square feet of building area. The property has a 12,947 square foot site and is located in Long Grove, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared by William P. Neberieza, a Certified General Residential Real Estate Appraiser. The appraisal report as stated in the Addendum was prepared

for a real estate tax appeal and estimated the subject property had a market value of \$750,000 as of January 1, 2017.

Using the sales comparison approach, the appraiser considered three comparable sales. The comparables were each located in Long Grove and from .21 to .30 of a mile from the subject property. The comparables have sites that range in size from 12,027 to 14,383 square feet of land area and were described as having an average view like the subject. The comparable properties are each improved with two-story dwellings that were 8 or 10 years old. The dwellings range in size from 4,147 to 4,534 square feet of living area and each comparable has a full finished basement, central air conditioning, two or three fireplaces and a three-car garage. The comparables sold between October 2015 to May 2016 for prices ranging from \$700,000 to \$770,000 or from \$168.80 to \$179.40 per square foot of living area, land included.

As part of the report, the appraiser asserted comparables reflect the best available residences in the subject neighborhood as of the effective date of the appraisal.

The appraiser applied adjustments to the comparables for differences when compared to the subject with the primary adjustments being in bathroom count of \$10,000 per full bathroom and for dwelling size at \$50 per square foot of living area. Through this process, Neberieza opined adjusted sales prices ranging from \$701,100 to \$757,700 or from \$167.12 to \$178.69 per square foot of living area, including land. As a result, the appraiser arrived at an estimated market value for the subject of \$750,000 or \$167.82 per square foot of living area, including land, as of January 1, 2017.

Based on this evidence, the appellant requested an assessment reflective of the appraised value conclusion at 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 \$276,764. The subject's assessment reflects a market value of \$836,651 or \$187.21 per square foot of 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 appellant's appraisal evidence, the board of review noted the valuation date of the report was January 1, 2017 with sales that occurred in both 2015 and 2016.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in Long Grove and within .178 of a mile from the subject. The comparables have sites that range in size from 12,873 to 18,594 square feet of land area which were improved with two-story Dryvit or brick dwellings that were built in 2006 or 2007. The dwellings range in size from 3,860 to 4,714 square feet of living area and each comparable has a basement, three of which have finished areas. The homes have central air conditioning, one to four fireplaces and a garage ranging in size from 863 to 1,007 square feet of building area. The comparables sold between May 2016 and June 2018 for prices ranging from \$782,500 to \$945,000 or from \$183.59 to \$203.49 per square foot of living area, land included. Based on this evidence, 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 appellant submitted an appraisal of the subject property with an opinion of value as of January 1, 2017 and the board of review submitted four suggested comparable sales to support their respective positions before the Property Tax Appeal Board.

The comparables presented by both parties were located in close proximity to the subject dwelling, were similar in land area and reflected dwellings of similar design, age, foundation and other features. The Board finds the appellant's appraisal report relied upon two dated sales for a value conclusion as of January 1, 2017 and clearly as of the valuation date at issue of January 1, 2018, the record reveals sales that occurred more proximate in time to the valuation date at issue. Thus, the Board has given little weight to the appellant's evidence both in terms of raw sales data and to the conclusion of value of the report. The Board has also given reduced weight to board of review comparable sale #3 which occurred in May 2016, a date 19 months before the valuation date at issue and thus less likely to be indicative of the subject's estimated market value as of the assessment date.

The Board finds the best evidence of market value to be board of review comparable sales #1, #2 and #4. The board of review comparable sales sold between February 2017 and June 2018 for prices ranging from \$842,500 to \$945,000 or from \$183.59 to \$203.49 per square foot of living area, including land. The subject's assessment reflects a market value of \$836,651 or \$187.21 per square foot of living area, including land, which is within the range established by the best comparable sales in the record on a per-square-foot basis and below the range in terms of overall value. After considering adjustments to the comparables for differences such as the subject being newer, 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.



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: May 26, 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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