



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

APPELLANT: Sean Cornelius
DOCKET NO.: 18-02775.001-R-1
PARCEL NO.: 15-06-305-139

The parties of record before the Property Tax Appeal Board are Sean Cornelius, 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: \$40,850
IMPR.: \$176,142
TOTAL: \$216,992

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 dwelling of brick exterior construction with 3,676 square feet of living area. The dwelling was constructed in 2014. Features of the home include an unfinished basement, central air conditioning, a fireplace and a 760 square foot garage. The property has a 11,326 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 information on four comparable sales located within 0.28 of a mile from the subject property. The comparables have sites that range in size from 12,436 to 13,423 square feet of land area and are improved with two-story dwellings of brick exterior construction that range in size from 3,446 to 4,468 square feet of living area. The homes were built from 2006 to 2013. Each comparable has an unfinished basement, central air conditioning, one or two

fireplaces and a garage ranging in size from 679 to 900 square feet of building area. The comparables sold from May 2017 to May 2018 for prices ranging from \$605,100 to \$667,000 or from \$141.28 to \$182.82 per square foot of living area, land included¹.

The appellant's counsel submitted comments indicating the subject's site was partially located in a flood zone which he suggested was a negative influence. Counsel provided an aerial map of the subject site which indicated the dwelling was located in an area of minimal flood hazard and the subject site's southwest corner was located in a Zone A flood zone. Based on this evidence, the appellant requested the subject's assessment be reduced to \$203,385.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$216,992. The subject's assessment reflects a market value of \$655,961 or \$178.44 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 support of its contention of the correct assessment the board of review submitted information on four comparable sales located within approximately 0.23 of a mile from the subject property. Board of review comparables #2, #3 and #4 are the same properties as the appellant's comparables #2, #3 and #4, respectively. The comparables have sites that range in size from 11,627 to 13,423 square feet of land area and are improved with two-story dwellings of brick exterior construction that range in size from 3,446 to 4,283 square feet of living area. The homes were built from 2006 to 2018. Each comparable has a basement, one with finished area, central air conditioning, one or two fireplaces and a garage ranging in size from 679 to 840 square feet of building area. The comparables sold from May 2017 to May 2018 for prices ranging from \$605,100 to \$850,000 or from \$141.28 to \$232.88 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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.

To address the issue of the subject site being partially located in a flood plain, the Board finds that while the appellant's counsel claimed this was a negative influence, no reduction in the appellant's land assessment was requested. Additionally, based on the aerial map submitted by the appellant, the subject's improvements appear to be located in an area of minimal flooding. Furthermore, the appellant did not provide any evidence supporting this negative influence claim. Therefore, due to a lack of market data, the Board gave no consideration to this claim by the appellant.

¹ Details regarding the appellant's comparable #4 were corrected based on sale data submitted by the board of review in their grid analysis and property record card for the property.

The record contains five comparables for the Board's consideration as three of the comparables were common to both parties. The Board gave less weight to the appellant's comparables #1 and #4/board of review #4 which have dissimilar dwelling sizes when compared to the subject. The Board gave less weight to board of review comparable #1 which differs from the subject in its finished basement compared to the subject's unfinished basement and the home appears to have been new at the time of sale.

The Board finds the best evidence of market value to be appellant's comparable sales #2 and #3 which are shared by the board of review. These comparables are similar to the subject in location, age, design, dwelling size, site size and features. They sold in May and July 2017 for prices of \$637,500 and \$630,000 or for \$176.25 and \$182.82 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$655,961 or \$178.44 per square foot of living area, including land, which is bracketed by the two best comparables on a per square foot basis and slightly higher than the sale prices of the two best comparables. The subject's higher value appears justified given its newer age and larger dwelling size compared to the two best comparables in the record. After considering adjustments to the comparables for difference with the subject, 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:

January 19, 2021



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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