



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

APPELLANT: Michael Alter
DOCKET NO.: 19-02767.001-R-1
PARCEL NO.: 15-29-102-057

The parties of record before the Property Tax Appeal Board are Michael Alter, the appellant; 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: \$29,040
IMPR.: \$108,630
TOTAL: \$137,670

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 2019 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 frame construction with 2,348 square feet of living area. The dwelling was constructed in 1975. Features of the home include a full basement, central air conditioning, a fireplace, and a two-car garage with 440 square feet of building area.¹ The property has a 6,656 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant marked recent appraisal as the basis of the appeal. In support of this overvaluation argument the appellant submitted an appraisal estimating the subject property had a market value of \$348,000 as of October 3, 2019. The appraisal was signed by Patricia Halls, an Associate Real Estate Trainee Appraiser and Paul D. Brose, the Supervisory Appraiser and a State Certified Residential Real Estate Appraiser. The property rights appraised were fee simple. The intended

¹ The appraiser indicated the subject has 585 square feet of finished basement area while the board of review disclosed the subject has an unfinished basement.

use of this appraisal was to evaluate the subject property for home equity loan purposes. The appraiser performed an exterior only inspection.

In estimating the subject's market value, the appraiser developed the sales comparison approach to value utilizing four comparables sales and one active listing located within .78 of a mile from the subject property. The comparables are described as two-story, Colonial style dwellings ranging in size from 2,103 to 2,352 square feet of living area and range in age from 39 to 47 years old. Four comparables have basements, with two having finished area. Each comparable has central air conditioning and a two-car garage. Four comparables each have one or two fireplaces. The comparables have sites ranging in size from 6,138 to 11,595 square feet of land area. Comparables #1 through #4 sold from June to September 2019 for prices ranging from \$326,500 to \$360,000 or from \$139.05 to \$171.18 per square foot of living area, including land. Comparable #5 was listed for \$379,900 or \$161.80 per square foot of living area, including land. The appraiser applied adjustments to the comparables for differences when compared to the subject which resulted in adjusted prices ranging from \$324,600 to \$372,000. Based on these adjusted prices, the appraiser estimated the subject's market value to be \$348,000 as of October 3, 2019.

The appellant also submitted a grid analysis on five equity comparables located within .17 of a mile from the subject.² The comparables are described as two-story dwellings of frame exterior construction that were built in 1975 and each has 2,348 square feet of living area. Three comparables have basements. Each comparable has central air conditioning and a 440 square foot garage. Four comparable each have a fireplace. The comparables have land assessments ranging from \$3.50 to \$4.38 per square foot of land area and improvement assessments ranging from \$43.00 to \$46.00 per square foot of living area.

Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$137,670. The subject's assessment reflects a market value of \$418,577 or \$178.27 per square foot of living area, land included when applying the 2019 three-year average median level of assessment for Lake County of 32.89% as determined by the Illinois Department of Revenue. The subject has a land assessment of \$4.36 per square foot of land area and an improvement assessment of \$46.26 per square foot of living area.

In support of its contention of the correct assessment of the subject property the board of review submitted a grid analysis on ten comparable sales located within .64 of a mile from the subject. The comparables are described as two-story dwellings of frame construction ranging in size from 2,264 to 2,426 square feet of living area. The dwellings were constructed from 1975 to 1987. Eight comparables have basements with seven having finished area. Each comparable has central air conditioning and a garage ranging in size from 400 to 484 square feet of building area. Nine comparables each have a fireplace. The comparables have sites ranging in size from 6,000 to 10,887 square feet of land area. The comparables sold from February 2018 to February 2020 for prices ranging from \$355,000 to \$468,000 or from \$151.19 to \$198.47 per square foot of

² Since the appellant also submitted equity data on five comparables, the Board will also do an analysis of the subject for assessment inequity.

living area, including land. These comparables have land assessments ranging from \$2.46 to \$4.76 per square foot of living area and improvement assessments ranging from \$43.59 to \$52.54 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 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 Board gave less weight to the conclusion of value contained in the appellant's appraisal because the appraiser utilized two sales smaller in dwelling size and one sale that lacked a basement foundation when other more similar sales were available that were provided by the board of review. However, the Board will look at the raw sales data in the appraisal.

The Board gave less weight to the appellant's appraisal comparables #2 through #5 due to their smaller dwelling sizes, lack of a basement foundation and/or active listing which has not yet sold when compared to the subject. The Board also gave less weight to board of review comparables #4, #5 and #9 due to their lack of basement foundations or having sold in February 2020 which is less proximate in time to the January 1, 2019 assessment date than the other sales in the record.

The Board finds the best evidence of market value to be appraisal comparable #1 and the remaining board of review comparables. These eight comparables sold proximate in time to the assessment date at issue and are similar to the subject in location, dwelling size, age and most features. The comparables sold from February 2018 to November 2019 for prices ranging from \$326,500 to \$468,000 or from \$139.05 to \$198.47 per square foot of living area, including land. The subject's assessment reflects a market value of \$418,577 or \$178.27 per square foot of living area, including land, which falls within the range established by the best comparable sales in the record. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. Therefore, a reduction in the subject's assessment is not justified.

With respect to assessment inequity, 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 submitted 15 equity comparables to support their respective positions before the Property Tax Appeal Board. With respect to the subject's land assessment, the Board gave

reduced weight to board of review comparables #2, #4 and #10 due to their larger land sizes when compared to the subject. The Board finds the remaining comparables are more similar in land size to the subject and have land assessments ranging from \$3.50 to \$4.76 per square foot of land area. The subject has a land assessment of \$4.36 per square foot of land area which falls within the range of the most similar comparables in this record. Based on this record, the Board finds a reduction in the subject's land assessment is not warranted.

As to the subject's improvement assessment, the Board gave less weight appellant's comparables #1 and #5 along with board of review comparables #5 and #9 which lack basement foundations unlike the subject. The Board also gave less weight to board of review comparables #2, #3, #4, #6, #7, #8 and #10 which have finished basements in contrast to the subject' unfinished basement. The Board finds the best evidence of assessment equity to be appellant's comparables #2, #3 and #4 along with board of review comparable #1 which overall are most similar to the subject in location, dwelling size, design, age and features. These comparables have improvement assessments ranging from \$45.00 to \$48.04 per square foot of living area. The subject's improvement assessment of \$46.20 per square foot of living area falls within the range established by the best comparables in this record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed.

In conclusion, having examined the entire record, the Board finds that no change in the subject's assessment is warranted based either upon grounds of overvaluation or assessment inequity.

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 18, 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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