



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

APPELLANT: Vijay Mandava  
DOCKET NO.: 19-02791.001-R-1  
PARCEL NO.: 14-22-103-026

The parties of record before the Property Tax Appeal Board are Vijay Mandava, the appellant, by attorney Gregory Riggs, of Tax Appeals Lake County in Lake Zurich; and the Lake County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds ***a reduction*** 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:** \$36,339  
**IMPR.:** \$189,638  
**TOTAL:** \$225,977

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 2-story dwelling of brick exterior construction with 4,908 square feet of living area.<sup>1</sup> The dwelling was constructed in 2006. Features of the home include a full unfinished basement, central air conditioning, a fireplace and a 3-car garage. The property has a 12,156 square foot site and is located in Lake Zurich, Ela Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal estimating the subject property had a market value of \$678,000 as of February 2, 2020. The appraisal was prepared by Vitaliy L. Bashinskiy, a State Certified General Real Estate Appraiser, and the property rights appraised were fee simple. The intended

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<sup>1</sup> The Board has accepted the dwelling size reported in the subject's property record card which was supported with a schematic drawing despite that the appellant's appraiser reported a dwelling size of 4,798 square feet of living area without supporting data.

use of this appraisal was to develop a market value opinion of the subject property for property tax appeal. The appraisal is based on interior and exterior inspections of the subject property.

In estimating the market value, the appraiser developed the sales comparison approach to value. Under the sales comparison approach to value, the appraiser utilized four comparable sales of properties located from .02 to .15 of a mile from the subject property. The comparables are described as 2-story dwellings ranging in size from 3,196 to 4,987 square feet of living area and ranging in age from 8 to 14 years old. The comparables each feature a full basement, two with finished area. The comparables also each feature central air conditioning, one or two fireplaces, and a 3-car attached garage. The comparables have sites ranging in size from 12,066 to 15,259 square feet of land area. The comparables sold from June 2018 to July 2019 for prices ranging from \$565,000 to \$760,000 or from \$113.29 to \$203.38 per square foot of living area, including land. After applying adjustments to the comparables for differences when compared to the subject, the appraiser arrived at adjusted prices ranging from \$562,500 to \$687,500 and an opinion of market value for the subject of \$678,000 as of February 2, 2020. Based on the 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 \$252,180. The subject's assessment reflects a market value of \$766,738 or \$156.22 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.

In support of its contention of the correct assessment of the subject property, the board of review submitted a grid analysis and property record cards on the subject and the same four comparable sales utilized by the appellant's appraiser. The board of review through the Township Assessor submitted a memorandum arguing that the effective date of the appraisal report in February 2020 is too remote in time from the subject's January 1, 2019 assessment date in question. The board of review also argued that the appraiser's price per square foot of living area is low given the subject's neighborhood; one of the sales is a short sale; one comparable is more than 1,700 square feet smaller in dwelling size than the subject. The board of review acknowledged that all the comparables are located in the subject's assessment neighborhood.

Based on this evidence and argument, 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the appellant submitted an appraisal while the board of review provided a grid analysis and property record cards for the same four comparable sales and a critique of the

appraiser's comparables despite presenting the same properties in support of the subject's estimated market value.

As to the board of review's argument that the date of the appraisal of February 2, 2020 is too remote in time from the subject's January 1, 2019 assessment date at issue, the Board finds this argument unpersuasive. The record shows that three of the four comparable sales occurred after the subject's January 1, 2019 assessment date. The Board shall consider all the evidence timely submitted and weigh its credibility depending upon its reliability in showing market value as of the January 1, 2019 assessment date. Based on the evidence in the record, the Board finds that the sales utilized by the appraiser all occurred within 7 months of January 1, 2019 and are therefore proximate in time to the assessment date at issue.

The Board finds that the opinion of value reached in the appraisal submitted by the appellant appears to be supported. The appraiser adjusted the comparables for differences from the subject in location on a cul-de-sac, above grade elevation, finished basement area, dwelling size, porch/deck features, number of fireplaces, and overall condition. The Board finds that the board of review criticisms of adjustments by the appraiser had no factual support in the record. The appraiser arrived at adjusted prices ranging from \$562,500 to \$687,500 and an opinion of market value for the subject of \$678,000. The subject's assessment reflects an estimated market value of \$766,738 which is higher than the opinion of value arrived at by the appraiser. The Board finds the appraiser's adjustments and value conclusion appear to be logical, reasonable, and supported. Therefore, the Board finds the subject's estimated market value as reflected by its assessment is overvalued and a reduction in the subject's assessment commensurate with appellant's request is 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: October 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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