



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

APPELLANT: Charles Ryan  
DOCKET NO.: 19-02810.001-R-1  
PARCEL NO.: 12-31-301-004

The parties of record before the Property Tax Appeal Board are Charles Ryan, 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:** \$142,721  
**IMPR.:** \$170,721  
**TOTAL:** \$313,442

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 one-story dwelling of brick exterior construction with 3,812 square feet of living area. The dwelling was constructed in 1990. Features of the home include a walk out basement with a recreation room, central air conditioning, four fireplaces and a garage with 900 square feet of building area. The property has an 80,590 square foot site and is located in Lake Forest, Shields Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted a grid analysis and property record cards for the subject and four comparable sales. The comparables are located from .07 to 1.51 miles from the subject property, three of which are located within the same neighborhood code as the subject. The comparables have sites that range in size from 60,040 to 141,570 square feet of land area. The comparables are improved with 1-story, 1.75-story or 2-story dwellings of brick or wood siding exterior

construction ranging in size from 3,834 to 6,586 square feet of living area. The dwellings were built from 1987 to 1998. Each comparable has a basement, two of which have recreation rooms. The comparables each have central air conditioning, two or three fireplaces and a garage that ranges in size from 648 to 992 square feet of building area. Two comparables have inground swimming pools. The appellant reported that the properties sold from June 2018 to October 2019 for prices ranging from \$735,000 to \$1,000,000 or from \$151.84 to \$199.80 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$291,638, which would reflect a market value of \$875,002 or \$229.54 per square foot of living area, including land, 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 \$384,992. The subject's assessment reflects a market value of \$1,170,544 or \$307.07 per square foot of living area, land included, when using 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, the board of review submitted a grid analysis of the subject and three comparable sales, along with a copy of the subject's property record card. The comparables are located within .43 of a mile from the subject property and within the same neighborhood code as the subject. The comparables have sites with either 26,140 or 27,440 square feet of land area. The comparables are improved with two-story dwellings of wood siding, brick or stucco exterior construction ranging in size from 3,730 to 4,194 square feet of living area. The dwellings were built in either 1996 or 1998. Each comparable has a basement with a recreation room, central air conditioning, one or two fireplaces and a garage that ranges in size from 704 to 744 square feet of building area. Two comparables have inground swimming pools. The properties sold from July to December 2017 for prices ranging from \$1,137,500 to \$1,225,000 or from \$274.20 to \$314.34 per square foot of living area, including land. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains seven suggested comparable sales for the Board's consideration, none of which are truly similar to the subject. The Board finds the appellant's comparables differ from the subject in location, dwelling size, design and/or features, whereas the board of review comparables differ from the subject in design and have sale dates which occurred less proximate in time to the assessment date at issue. Nevertheless, the Board gives less weight to the appellant's comparables #1, #3 and #4 due to their dissimilar designs when compared to the subject. Furthermore, the appellant's comparable #1 has a substantially larger dwelling size than

the subject dwelling and appellant's comparables #1 and #4 each have an inground swimming pool, not a feature the subject enjoys. The Board gives reduced weight to the comparables submitted by the board of review due to their dissimilar designs and their sales occurred in 2017, which are dated and less likely to be indicative of the subject's market value as of the January 1, 2019 assessment date.

The Board finds on this limited record that the best evidence of market value is appellant's comparable sale #2. The Board finds this comparable to be most similar to the subject in dwelling size and design. However, the Board finds the subject dwelling is superior to this comparable dwelling in that it has a considerably larger walk out basement with finished area, two additional fireplaces and a larger garage, suggesting upward adjustments for these features would be necessary in order to make this comparable more equivalent to the subject. This comparable sold in June 2018 for a price of \$735,000 or \$191.71 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,170,544 or \$307.07 per square foot of living area, including land, which is greater than the most similar comparable sale in the record both in terms of overall market value and on a price per square foot basis. After considering adjustments to the comparable for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is excessive. Therefore, based on this record, the Board finds a reduction in the subject's assessment 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: September 21, 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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