



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

APPELLANT: Prashant Kumbhare
DOCKET NO.: 19-02814.001-R-1
PARCEL NO.: 15-34-303-015

The parties of record before the Property Tax Appeal Board are Prashant Kumbhare, 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: \$27,361
IMPR.: \$92,097
TOTAL: \$119,458

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 split-level dwelling of frame exterior construction with 1,368 square feet of above ground living area. The dwelling was constructed in 1982. Features of the home include a finished lower level, central air conditioning, a fireplace and an attached garage with 492 square feet of building area. The property has a 10,254 square foot site and is located in Buffalo 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 five comparable sales located within the same neighborhood code as the subject and from .06 to .16 of a mile from the subject property. The comparables have sites that range in size from 7,279 to 11,380 square feet of land area. The comparables are improved with split-level dwellings of frame exterior construction with either 1,368 or 1,452 square feet of above ground living area. The dwellings were built in 1979 or 1982. Each

comparable has a finished lower level, central air conditioning and an attached garage with 492 square feet of building area. Four comparables each have one fireplace. The properties sold from June 2017 to June 2018 for prices ranging from \$317,500 to \$388,000 or from \$232.09 to \$267.22 per square feet of above ground living area, including land. As part of the submission, the appellant provided a copy of a memorandum from the Vernon Township Assessor's Office noting "the median level of the 32 sales is \$265.35 sale price per AGLA" with a handwritten notation from an undisclosed source stating the "board disregarded township recommendation."

Based on this evidence, the appellant requested the subject's assessment be reduced to \$114,988, which would reflect a market value of \$344,998 or \$252.19 per square foot of above ground 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 \$125,941. The subject's assessment reflects a market value of \$382,916 or \$279.91 per square foot of above ground 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 response to the appellant's evidence, the board of review noted that appellant's comparable sales #3 and #5 sold in 2017.

In support of its contention of the correct assessment, the board of review submitted information on six comparable sales located within the same neighborhood code as the subject and from .06 to .17 of a mile from the subject property. Board of review comparables #1, #2 and #3 are duplicates of appellant's comparables #1, #4, and #2, respectively. The comparables have sites that range in size from 7,322 to 9,304 square feet of land area. The comparables are improved with split-level dwellings of frame exterior construction ranging in size from 1,368 to 1,512 square feet of above ground living area. The dwellings were built in 1979 or 1982. Each comparable has a finished lower level and one comparable also has an additional partial unfinished basement. The comparables each have central air conditioning and an attached garage with either 465 or 492 square feet of building area. Four comparables each have one fireplace and one comparable has a shed. The properties sold from April 2018 to September 2019 for prices ranging from \$362,000 to \$388,000 or from \$239.42 to \$267.22 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 parties submitted a total of eight comparable sales to support their respective positions before the Property Tax Appeal Board, as three sales were common to both parties. The Board

gives less weight to appellant's comparable #3 and #5 as their sale dates as noted by the board of review occurred less proximate in time to the January 1, 2019 assessment date than the other comparable sales in the record. The Board gives reduced weight to board of review comparable #5 as it has a secondary basement unlike the subject.

The Board finds the best evidence of market value to be the five remaining comparable sales, which includes the three common sales. The Board finds these comparables are relatively similar to the subject in location, dwelling size, design, age and features. These properties sold from April to September 2018 for prices ranging from \$362,000 to \$388,000 or from \$239.42 to \$267.22 per square foot of above ground living area, including land. The subject's assessment reflects a market value of \$382,916 or \$279.91 per square foot of above ground living area, including land, which is within the range established by the best comparable sales in the record in terms of overall market value but above the range on a price per square foot basis. After considering adjustments to the comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is excessive. Therefore, based on this evidence the Board finds a reduction in the subject's assessment is warranted.

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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