



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

APPELLANT: Kyle Sheahen
DOCKET NO.: 19-03145.001-R-1
PARCEL NO.: 14-24-401-019

The parties of record before the Property Tax Appeal Board are Kyle Sheahen, the appellant, by Marc D. Engel, Attorney at Law in Northbrook, 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: \$79,516
IMPR.: \$145,056
TOTAL: \$224,572

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 exterior construction with 4,347 square feet of living area. The dwelling was constructed in 1982. Features of the home include a basement with finished area, central air conditioning, two fireplaces, an inground swimming pool and a three-car garage with 1,064 square feet of building area.¹ The property has a site that contains approximately 3.66 acres and is located in Long Grove, 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 \$530,000 as of January 1, 2019. The appraisal was prepared by Scott Reicin, a State of Illinois Certified Residential Real Estate Appraiser. The property rights appraised were fee simple estate and the purpose of the appraisal was to provide an opinion of market value for the subject property for

¹ The appellant's appraisal indicated the subject has two fireplaces and a basement that is 60% finished, whereas, the board of review indicated three fireplaces and an unfinished basement.

tax purposes. The appraiser described the subject as being in average condition as compared to similar properties within its own market area.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value using four comparable sales located from .20 to 3.66 miles from the subject. The comparables are described as split-level or traditional dwellings ranging in size from 3,310 to 5,791 square feet of living area. The properties range in age from 28 to 68 years old and are situated on sites ranging in size from 2.06 to 4.35 acres of land. The comparables have basements, two of which have finished area. Each comparable has central air conditioning and a two-car, a three-car, or a four-car garage. Comparable #4 has an inground swimming pool. The comparables sold in March and May 2018 for prices ranging from \$503,000 to \$550,000 or from \$86.86 to \$155.59 per square foot of living area, including land. The appraiser adjusted the comparables for differences in condition, room count, gross living area, basement finish and/or garages. After applying adjustments to the comparables for differences from the subject, the comparables had adjusted prices ranging from \$485,245 to \$548,000. Based on the adjusted sales, the appraiser estimated the subject had a market value of \$530,000.

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 \$224,572. The subject's assessment reflects an estimated market value of \$682,797 or \$157.07 per square foot of living area, including land, when applying the 2019 three-year average median level of assessment for Lake County of 32.89%.

In response to the appeal, the board of review submitted property record cards and a detailed grid analysis of the appellant's appraisal comparables along with an aerial map that was prepared by the township assessor. The map depicts comparable #2 backing up to a four-lane highway. The assessor asserted the appraiser failed to make adjustments to the appraisal comparables for differences in location, land size and/or age when compared to the subject.

In support of the subject's assessment, the board of review submitted information on seven comparable sales located from .25 to 1.53 miles from the subject. The comparables consist of two-story dwellings of frame, brick or brick and frame exterior construction that were built from 1978 to 1989. The dwellings range in size from 3,036 to 4,598 square feet of living area and are situated on sites that range in size from 1.81 to 5.06 acres of land. The comparables have unfinished basements, three of which are walk-out. Each comparable has central air conditioning, one to five fireplaces, and a garage ranging in size from 675 to 1,153 square feet of building area. The comparables sold from July 2017 to March 2019 for prices ranging from \$485,000 to \$922,500 or from \$159.75 to \$214.81 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains an appraisal submitted by the appellant and seven comparable sales presented by the board of review to support their respective positions.

As to the appellant's appraisal, the Board gave less weight to the appraiser's conclusion of value as the appraiser failed to apply adjustments to the comparable sales for differences in location, land size and/or age without explanation when compared to the subject. Furthermore, the appraiser indicated comparable #1 has a four-car garage and the subject has a smaller three-car garage but the appraiser failed to make an adjustment for the difference. The appraiser also utilized a sale located over 3 miles from the subject property. These factors undermine the credibility of the appraiser's conclusion of value for the subject property. However, the Board will analyze the raw sales utilized in the appraisal.

The Board finds the best evidence of market value to be appellant's appraisal comparable #4 and board of review comparable sale #1 as both are similar to the subject in living area, age, and features. Furthermore, both comparables sold proximate in time to the January 1, 2019 assessment date and have an inground swimming pool, a feature of the subject. These properties sold in May 2018 for prices of \$550,000 and \$700,000 or for \$113.90 and \$167.99 per square foot of living area, including land. The subject's assessment reflects a market value of \$682,797 or \$157.07 per square foot of living area, land included which is bracketed by the two best comparables in the record both on overall price and per square foot bases. The Board gave less weight to the remaining comparables in the record due to differences in location, age, and/or dwelling size when compared to the subject. In addition, board of review comparable sales #2, #3 and #4 sold in 2017, less proximate in time to the January 1, 2019 assessment date. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is well supported and no reduction in 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:

February 15, 2022



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

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