



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

APPELLANT: Paul Chason
DOCKET NO.: 19-03187.001-R-1
PARCEL NO.: 15-32-103-062

The parties of record before the Property Tax Appeal Board are Paul Chason, the appellant, by attorney Kevin Fanning of Fanning Law, LLC in Chicago; 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: \$30,823
IMPR.: \$84,268
TOTAL: \$115,091

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 frame and brick exterior construction with 1,614 square feet of living area. The dwelling was constructed in 1973 and is approximately 46 years old. Features of the home include a full basement with finished area, central air conditioning and a two-car garage with 442 square feet of building area. The property has a 9,000 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 an appraisal estimating the subject property had a market value of \$280,000 as of January 1, 2018. The bottom portion of each page of the appraisal was not included in the evidence submitted. The portion of the report that was made available disclosed the appraisal was prepared by Peter Soukoulis but his credentials were not shown in the report. The purpose of the appraisal was to estimate the market value of the subject property for an *ad valorem* tax

appeal. The property rights appraised were the fee simple interest with the client identified as Chason.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value considering three comparable sales. The comparables are located from .22 to .41 of a mile from the subject property with sites ranging in size from 9,050 to 11,934 square feet of land area. The comparables are improved with one-story dwellings of frame or brick and frame exterior construction, each containing 1,614 square feet of living area. The dwellings are 46 or 48 years old. The appraiser reported that one comparable has a full basement finished with a recreation room. Each comparable has central air conditioning and a two-car garage. The comparables sold from January to October 2017 for prices of \$280,000 and \$291,500 or for \$173.48 and \$180.61 per square foot of living area, including land. The appraiser applied adjustments to the comparables for differences from the subject in land area and basements to arrive at adjusted prices ranging from \$280,000 to \$293,645. As a result, the appraiser arrived at an estimated market value for the subject of \$280,000 as of January 1, 2018.

Based on this evidence, the appellant requested an assessment of \$98,324 which reflects an estimated market value of \$295,002 or \$182.78 per square foot of living area, including land, 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 \$115,091. The subject's assessment reflects a market value of \$349,927 or \$216.81 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 information on four comparable sales located within the same neighborhood as the subject and from .15 to .47 of a mile from the subject property. The comparables have sites that range in size from 8,775 to 11,029 square feet of land area. The comparables are improved with one-story dwellings of frame exterior construction, each containing 1,614 square feet of living area. The dwellings were built in 1970 or 1972. Two comparables have a full or partial basement with finished area. Each comparable has central air conditioning and a 442 square foot garage. The comparables sold from May 2018 to March 2020 for prices ranging from \$325,000 to \$372,000 or from \$201.36 to \$230.48 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 appellant submitted an incomplete appraisal of the subject property with a final value conclusion of \$280,000 as of January 1, 2018, while the board of review submitted four comparable sales to support their respective positions.

The Board gives little weight to the value conclusion in the appellant's appraisal report as the report was an incomplete copy and the effective date of the appraisal is one year prior to the January 1, 2019 assessment date. Furthermore, the appraiser's comparable sales occurred from January to October 2017, which are dated and less likely to be indicative of the subject's market value as of the lien date at issue. As a result, these factors undermine the credibility of the appraiser's final opinion of value relative to the 2019 tax year.

The Board gives less weight to board of review comparable sale #1 as this property sold less proximate in time to the assessment date than the remaining comparable sales in the record. The Board finds the best evidence of market value in the record to be board of review comparable sales #2, #3 and #4. These comparables are similar to the subject in location and each dwelling is identical to the subject in dwelling size, design and age. However, two of the comparables lack finished basements which is in contrast to the subject's full basement that is partially finished subject suggesting an upward adjustment would be required for this feature to make these comparables more equivalent to the subject. The three comparables sold in May 2018 and April 2019 for prices ranging from \$325,000 to \$372,000 or from \$201.36 to \$230.48 per square foot of living area, including land. The subject's assessment reflects an estimated market value of \$349,927 or \$216.81 per square foot of living area, including land, which falls within the range established by the best comparable sales contained in the record both in terms of overall market value and on a price per square foot basis. Based on this record and after considering any necessary 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 and a reduction in the subject's assessment is not 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: January 18, 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

AGENCY

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