



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

APPELLANT: Shannon Tor
DOCKET NO.: 19-04037.001-R-1
PARCEL NO.: 11-21-217-016

The parties of record before the Property Tax Appeal Board are Shannon Tor, the appellant, by attorney Joan Vasquez, of Property Tax Appeals, LLC in Palatine; 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: \$72,270
IMPR.: \$168,973
TOTAL: \$241,243

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 is improved with a two-story wood-sided single-family dwelling built in 2017. The dwelling contains 2,632 square feet of living area and features a full basement with finished area, central air-conditioning, one fireplace, 3½ bathrooms, a deck, and a 720-square foot attached garage.¹ The dwelling is situated on a 20,470 square foot site and is located in Libertyville, Libertyville Township, Lake County.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted information on three comparable sales located within .58 of a mile from the subject, two of which have the same neighborhood code as the subject. The comparables consist of two-story single-family dwellings of wood siding exterior construction that range in size from 2,568

¹ Some details about the subject have been corrected or modified by the grid analysis, property record card and listing sheet submitted by the board of review.

to 3,291 square feet of living area. The comparables were built from 2011 to 2017 and are situated on lots ranging in size from 2,740 to 9,100 square feet of land area. According to the grid analysis, the comparables each have a full basement, with comparable #3 having finished area. According to listing sheets submitted by the appellant, comparable #1 features a basement recreation room and comparable #3 features a finished English basement with large recreation room, full bathroom and exterior access to yard. The comparables each have central air conditioning, one fireplace, a deck or patio, and a two-car garage. The dwellings have either 3½ or 4 bathrooms. The comparables sold from November 2018 to August 2019 for prices ranging from \$675,000 to \$705,500 or from \$205.10 to \$263.82 per square foot of living area, land included. Based on the above evidence, the appellant requested a reduction in the subject's assessment to \$229,977 which equates to a market value of approximately \$690,000 or \$262.16 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$259,381. The subject's assessment reflects a market value of approximately \$788,632 or \$299.63 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 response to appellant's evidence, the board of review submitted a listing sheet showing that the subject property was listed for sale on March 15, 2021 with an asking price of \$799,900. The listing sheet also reports that the subject has a finished basement "with 9' ceilings, a full bath and PLENTY of room for media, recreation or even that home gym!" According to the board of review's grid analysis, the subject has a quality grade of GD++.

In support of its contention of the correct assessment, the board of review submitted a grid analysis containing information on the subject and on three comparable sales located within .26 of a mile from the subject which each have the same neighborhood code as the subject.² The comparables consist of two-story single-family dwellings of frame exterior construction that range in size from 3,036 to 3,195 square feet of living area. The comparables were built from 2007 to 2013 and are situated on lots ranging in size from 8,288 to 8,671 square feet of land area. According to the grid analysis, the dwellings each have an unfinished basement, central air-conditioning, two or four fireplaces, and a garage containing either 528 or 616 square feet of building area. The dwellings have either 4½ or 5½ bathrooms. According to the board of review's grid analysis, the three comparables have quality grades of VGd or VGd+. The comparables sold from January 2018 to June 2019 for prices ranging from \$930,000 to \$1,060,000 or from \$306.22 to \$349.14 per square foot of living area, land included.

² The grid analysis contains four suggested comparables but the record contains unexplained discrepancies as to the age, design and dwelling size of board of review comparable #2. The grid analysis states that it is a one-story dwelling built in 2018 with an effective age of 2013 but the photo following the grid shows a two-story dwelling. The property record card for this dwelling submitted by the board of review shows that the house was built in 1970 and has an effective age of 1970. The attached schematic depicts a one-story dwelling with 1,280 square feet of living area. The grid analysis shows first floor and second floor square footages totaling 2,590 square feet of living area. As the record contains conflicting data as to the age, design and dwelling size of this comparable, the Board will not further consider this dwelling.

Based on the foregoing 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 six comparable sales for the Board's consideration. The Board gives less weight to appellant's comparable #1 which is located in a different neighborhood code than the subject. The Board also gives less weight to the board of review comparables which are superior to the subject in quality grade and/or are older dwellings compared to the subject.

The Board finds that appellant's comparables #2 and #3 were the best comparables submitted in the record in terms of location, design, age, dwelling size, and most features, although comparable #2 has an unfinished basement requiring an upward adjustment to make it more similar to the subject. These comparables sold in November 2018 and April 2019 for \$675,000 to \$705,500 or \$205.10 and \$262.85 per square foot of living area, land included, respectively. The subject's assessment reflects an estimated market value of \$788,632 or \$299.63 per square foot of living area, land included, which is greater than either of the best comparable sales submitted for the Board's consideration. After considering adjustments to the comparables for any differences from the subject, 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: December 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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