



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

APPELLANT: Prabir Sen-Gupta
DOCKET NO.: 19-04289.001-R-1
PARCEL NO.: 15-30-201-005

The parties of record before the Property Tax Appeal Board are Prabir Sen-Gupta, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Lake Forest; 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: \$71,453
IMPR.: \$165,047
TOTAL: \$236,500

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 brick and frame exterior construction with 3,784 square feet of living area. The dwelling was constructed in 1980 and has an effective age of 1986. Features of the home include a basement with finished area, central air conditioning, two fireplaces, a 726 square foot garage and an inground swimming pool. The property has a 2.62-acre or 114,127 square foot site and is located in Long 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 six comparable sales located within 0.98 of a mile from the subject property. The comparables have sites that range in size from 44,431 to 80,150 square feet of land area and are improved with two-story dwellings of frame, brick or brick and frame exterior construction that range in size from 3,321 to 4,477 square feet of living area. The

dwellings were built from 1979 to 1994. Each comparable has a basement with finished area, central air conditioning, one or three fireplaces and a garage ranging in size from 714 to 1,212 square feet of building area. Comparable #6 also features an inground swimming pool and bath house. The properties sold from April 2018 to August 2019 for prices ranging from \$585,000 to \$780,000 or from \$136.25 to \$188.16 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$214,405 which reflects a market value of \$643,280 or \$170.00 per square foot of living area, land included, when applying the statutory assessment level of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$242,152. The subject's assessment reflects a market value of \$736,248 or \$194.57 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 three comparable properties but where only comparables #1 and #2 had recent sale information. Therefore, no further consideration shall be given to board of review comparable #3 which lacked any recent sale information. Board of review comparable #2 is the same property as the appellant's comparable #5. These two comparable sales are located within 0.38 of a mile from the subject property. The comparables have sites with 48,787 or 51,836 square feet of land area and are improved with two-story dwellings of frame or brick and frame exterior construction that have 3,321 or 3,375 square feet of living area. The homes were built in 1979 or 1987. Each comparable has a basement with finished area, central air conditioning, one or two fireplaces and a garage with 714 or 1,056 square feet of building area. The properties sold in April and June 2018 for prices of \$600,000 and \$702,000 or for \$180.67 and \$208.00 per square foot of living area, land included.

The board of review also submitted an aerial map depicting the proximity of the subject and its comparables #1 and #2 arguing the subject's lot backs to water and a golf course. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 comparable sales for the Board's consideration, as one comparable was common to both parties. The Board gives less weight to the appellant's comparables #1 and #4 along with board of review comparable #1 which differ from the subject in dwelling size or garage size.

The Board finds the best evidence of market value to be the remaining comparables which are more similar to the subject in location, age, design, dwelling size and some features. However, each of these properties has a smaller site size compared to the subject and three lack an inground swimming pool, a feature present in the subject improvements. These comparables sold from April 2018 to August 2019 for prices ranging from \$585,000 to \$715,000 or from \$166.19 to \$188.16 per square foot of living area, including land. The subject's assessment reflects a market value of \$736,248 or \$194.57 per square foot of living area, including land, which falls above the range established by the best comparable sales in this record. After considering adjustments to the comparables for differences from the subject, 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: November 16, 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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