



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

APPELLANT: Susan Daly
DOCKET NO.: 19-04464.001-R-1
PARCEL NO.: 12-28-401-007

The parties of record before the Property Tax Appeal Board are Susan Daly, 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 **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: \$247,084
IMPR.: \$373,021
TOTAL: \$620,105

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 2.5-story dwelling of wood siding exterior construction with 5,882 square feet of living area. The dwelling was constructed in 1910. Features of the home include a basement with a 1,432 square foot recreation room, central air conditioning, four fireplaces and a 572 square foot attached garage. The property also has an 820 square foot inground swimming pool and a hot tub. The property has a 48,790 square foot site and is located in Lake Forest, Shields Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales, two of which are located within the same assessment neighborhood code as the subject. The comparables have sites that range in size from 41,380 to 70,280 square feet of land area. The comparables are improved with 1.75-story or 2-story dwellings of brick or wood siding exterior construction ranging in size from

5,151 to 5,802 square feet of living area. The dwellings were built from 1900 to 1988 with comparable #2 having a reported effective age of 1950. The comparables each have a basement, two of which have either a 700 or a 737 square foot recreation room. Each comparable has central air conditioning and one to six fireplaces. Three of the comparables each have an attached garage that ranges in size from 275 to 945 square feet of building area. Comparable #4 also has a 725 square foot detached garage and comparable #3 has a green house. These four properties sold from March 2018 to May 2019 for prices ranging from \$1,000,000 to \$1,740,000 or from \$194.14 to \$299.90 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$535,250, which would reflect a market value of \$1,605,911 or \$273.02 per square foot of 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 \$620,105. The subject's assessment reflects a market value of \$1,885,391 or \$320.54 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 sales located within the same assessment neighborhood code as the subject. Board of review comparable #1 is the same property as the appellant's comparable #4. The comparables have sites that range in size from 46,580 to 54,010 square feet of land area. The comparables are improved with one-story or two-story dwellings of brick or wood siding exterior construction ranging in size from 5,312 to 5,802 square feet of living area. The dwellings were built from 1910 to 1930. The comparables each have a basement, one of which has a 594 square foot recreation room. Each comparable has central air conditioning, one to six fireplaces and an attached garage that ranges in size from 275 to 768 square feet of building area. Board of review comparable #1 also has a 725 square foot detached garage. Comparables #2 and #3 each have an inground swimming pool. The properties sold from May 2017 to May 2019 for prices ranging from \$1,740,000 to \$2,100,000 or from \$299.90 to \$368.87 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 five suggested comparable sales for the Board's consideration, as one sale was common to both parties. The Board gives less weight to the appellant's comparables #1 and #2 due to their considerably smaller dwelling sizes and/or lack of a garage when compared to the subject. The Board also gives less weight to the appellant's comparable #3 as the dwelling is significantly newer in age than the subject dwelling. The Board gives reduced weight to board

of review comparable #2 due to its dissimilar one-story design when compared to the subject's two-story design.

The Board finds the best evidence of market value is the parties' common comparable sale, as well as board of review comparable sale #3. The Board finds these comparables are overall more similar to the subject in location, dwelling size, design and age. The Board finds the parties' common comparable is inferior to the subject in that it has a considerably smaller basement with no recreation room, and it lacks an inground swimming pool, a feature of the subject. The Board recognizes that board of review comparable #3 is a somewhat dated sale, however, the dwelling is identical to the subject dwelling in age and it has a basement recreation room, as well as an inground swimming pool like the subject. However, this comparable is inferior to the subject in dwelling size, basement size and in the size of its recreation room. These two comparables sold in May 2019 and May 2017 for prices of \$1,740,000 and \$1,880,000 or for \$299.90 and \$353.92 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$1,885,391 or \$320.54 per square foot of living area, including land, which is greater than the best comparable sales in the record in terms of overall market value, but falls between these comparables on a price per square foot basis. The Board finds that the subject's higher overall market value appears to be justified given its larger dwelling size and superior features. Therefore, after considering adjustments to the comparables for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its 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

AGENCY

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Susan Daly, by attorney:
Ronald Kingsley
Lake County Real Estate Tax Appeal, LLC
13975 W. Polo Trail Drive
#201
Lake Forest, IL 60045

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085