



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

APPELLANT: Christopher S. Bacon
DOCKET NO.: 19-04565.001-R-1
PARCEL NO.: 12-28-104-106

The parties of record before the Property Tax Appeal Board are Christopher S. Bacon, 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: \$51,785
IMPR.: \$67,355
TOTAL: \$119,140

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 townhouse with wood siding exterior construction containing 1,318 square feet of living area. The townhouse was constructed in 1984. Features of the home include an unfinished basement, central air conditioning, one fireplace, and an attached garage with 400 square feet of building area. The property has a 5,350 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 five comparable sales improved with a two-story townhouse and four, one-story dwellings of wood siding, stucco, or brick exterior construction ranging in size from 1,470 to 1,568 square feet of living area. The dwellings were built from 1969 to 1982. Each property has a basement with two having recreation rooms, four comparables have central air conditioning, three comparables have one or two fireplaces, and each comparable has an

attached garage ranging in size from 360 to 662 square feet of building area. The comparables have sites ranging in size from 6,490 to 14,370 square feet of land area. Each comparables is located in Lake Bluff with a different neighborhood code than the subject property and are located from approximately 1.17 to 2.38 miles from the subject property. The sales occurred from December 2016 to May 2019 for prices ranging from \$240,000 to \$375,000 or from \$163.27 to \$239.46 per square foot of living area, including land. The appellant requested the subject's assessment be reduced to \$119,140, reflecting a market value of approximately \$357,420 or \$271.18 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 \$136,974. The subject's assessment reflects a market value of \$416,461 or \$315.98 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 two comparable sales improved with two-story townhomes with wood siding exteriors containing 1,848 square feet of living area. The townhomes were built in 1985. Each property has a full basement with one having finished area, central air conditioning, one fireplace, and an attached garage with 462 square feet of building area. The comparables have sites with 5,080 and 5,020 square feet of land area, respectively. Each comparable is located approximately .62 miles from the subject and has a different neighborhood code than the subject property. These properties sold in March 2019 and November 2018 for prices of \$416,000 and \$515,000 or for \$225.11 and \$278.68 per square foot of living area, respectively.

The board of review also provided a statement asserting that the appellant presented only one attached townhouse style home like the subject property, with the other comparables being detached ranch dwellings. The board of review requested the assessment be sustained.

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 evidence in the record supports a reduction to the subject's assessment.

The record contains seven comparables submitted by the parties to support their respective positions. The Board finds the comparables are not particularly similar to the subject property in style and/or location. Appellant's comparables #2 through #5 include one-story dwellings, similar to the subject's one-story structure, however the comparables are detached ranch style dwellings unlike the subject's townhouse configuration. These four one-story dwellings sold for prices ranging from \$275,000 to \$375,000 or from \$187.33 to \$239.46 per square foot of living area, including land. The subject's assessment reflecting a market value of \$416,461 or \$315.98 per square foot of living area, including land, is significantly above this range.

Appellant's comparable #1 and the board of review comparables are townhomes, however, each differs from the subject in style as each is a two-story dwelling. These three properties sold for prices ranging from \$240,000 to \$515,000 or from \$163.27 to \$278.68 per square foot of living area, including land. The subject's assessment reflecting a market value of \$416,461 or \$315.98 per square foot of living area, including land, is within the overall price range but above the range on a per square foot basis.

After reviewing the sales presented by the parties, and considering the differences in style, size, construction, and age, the Board finds a reduction in the assessment of the subject property commensurate with the appellant's request is appropriate.

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

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

APPELLANT

Christopher S. Bacon, 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