



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

APPELLANT: Surender Puri
DOCKET NO.: 19-04757.001-R-1
PARCEL NO.: 16-14-315-021

The parties of record before the Property Tax Appeal Board are Surender Puri, 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: \$165,013
IMPR.: \$378,978
TOTAL: \$543,991

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-story dwelling of brick exterior construction with 6,159 square feet of living area. The dwelling was constructed in 2014. Features of the home include an unfinished basement, central air conditioning, one fireplace and a 912 square foot garage. The property has a 30,000 square foot site and is located in Highland Park, Moraine 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 located within 1 mile from the subject property. The comparables have sites that range in size from 21,580 to 54,030 square feet of land area. The comparables are improved with two, 2-story and two, 2.5-story dwellings of stone, wood siding, brick, or brick and wood siding exterior construction ranging in size from 5,338 to 5,993 square feet of living area. The dwellings were built from 1875 to 2005.

Comparables #1 and #3 have effective years of 1935 and 1930, respectively. The comparables have basements with recreation rooms, central air conditioning, one to four fireplaces and a garage ranging in size from 680 to 864 square feet of building area. The properties sold from July to October 2018 for prices ranging from \$950,000 to \$1,650,000 or from \$177.97 to \$280.90 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$587,348. The subject's assessment reflects a market value of \$1,785,795 or \$289.95 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 .91 miles from the subject. The board of review comparables #1 and #2 are duplicates of appellant's comparables #4 and #2, respectively. Board of review comparables #3 and #4 have sites with either 15,000 or 29,290 square feet of land area. The comparables are improved with 2-story or 3-story dwellings of wood siding or wood siding and stucco exterior construction with either 3,161 or 7,159 square feet of living area. The dwellings were built in 2018 and 1920, respectively. Comparable #4 has an effective year built of 1939. Each comparable has a basement with a recreation room, central air conditioning, and a garage with either 506 or 704 square feet of building area. Comparable #4 has two fireplaces and an inground swimming pool. The properties sold in April and March 2018 for prices of \$1,480,000 and \$1,450,000 or for \$468.21 and \$202.54 per square foot of living area, including land, respectively. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains six suggested comparable properties for the Board's consideration, as two comparables were common to both parties. The Board finds none of the comparables are truly similar to the subject due to differences in lot size, age, dwelling size and/or features. Nevertheless, the Board gives less weight to appellant's comparables #1 and #3 along with board of review comparables #3 and #4 due to their significantly older ages or smaller dwelling size when compared to the subject.

The Board finds the best evidence of market value to be the parties' two common comparables which overall are more similar to the subject in age and dwelling size. These comparables sold in July and August 2018 for prices of \$1,600,000 and \$1,650,000 or \$266.98 and \$280.90 per square foot of living area, including land. The subject's assessment reflects a market value of

\$1,785,795 or \$289.95 per square foot of living area, including land, which falls above the prices of the two best comparable sales in this record both on overall and per square foot bases. After considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is not supported and 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:

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

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