



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

APPELLANT: Thomas Paulson  
DOCKET NO.: 19-05772.001-R-1  
PARCEL NO.: 12-28-311-016

The parties of record before the Property Tax Appeal Board are Thomas Paulson, the appellant; 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:** \$66,037  
**IMPR.:** \$245,759  
**TOTAL:** \$311,796

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 wood siding exterior construction with 2,656 square feet of living area. The dwelling was constructed in 1912 and has an effective age of 1940. Features of the home include a basement with finished area, central air conditioning, one fireplace and a 576 square foot two-car garage. The property has a 6,800 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 an appraisal estimating the subject property had a market value of \$775,000 as of January 1, 2019. The appraisal was prepared by James W. Leech, a certified general real estate appraiser. The intended use of the appraisal report was for a 2019 real estate tax appeal.

The appraiser describes the subject property as a remodeled older traditional style home typical for the area. In 2007 the house, detached garage and foundation were renovated or replaced

resulting in the appraiser's estimated effective age of 25 years. The subject is described as having "many attractive features in the kitchen and baths" with generally good quality features and in good condition as of the appraisal date.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value using five comparable sales located from 0.04 to 0.58 of a mile from the subject property. The comparables have sites that range in size from 6,603 to 13,519 square feet of land area and are improved with 2-story dwellings described as traditional or colonial in style.<sup>1</sup> The dwellings range in size from 2,199 to 3,040 square feet of living area and range in age from 12 to 124 years old. Each comparable has a basement, one with finished area, central air conditioning, one or two fireplaces and a two-car garage. The comparables sold from April 2017 to May 2019 for prices of \$730,000 to \$760,000 or from \$250.00 to \$336.52 per square foot of living area, land included.

The appraiser adjusted the comparables for differences with the subject in site size, age, room count, dwelling size, basement area, basement finished area and other features. The appraiser described the comparables as being located "blocks from the subject" property and having similar overall quality and condition, especially with respect to kitchen and bathroom features. The appraiser acknowledged that comparable #1 was newer construction but that the property had been adjusted for its newer age. After adjustments, the appraiser arrived at adjusted prices ranging from \$736,500 to \$784,500 and an opinion of market value for the subject of \$775,000.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$233,310 which equates to a market value of \$700,000 or \$263.55 per square foot of living area, land included when applying 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 \$311,796. The subject's assessment reflects a market value of \$947,996 or \$356.93 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 comparables located within 0.66 of a mile from the subject property. The comparables have sites that range in size from 10,110 to 13,050 square feet of land area and are improved with 1.5-story, 1.75-story or 2-story dwellings of brick, wood siding or stone and stucco exterior construction that range in size from 2,427 to 3,168 square feet of living area. The homes were built from 1908 to 1986 and have effective ages ranging from 1928 to 1986. Each comparable has a basement, three with finished area, one or two fireplaces and a garage ranging in size from 420 to 624 square feet of building area. Three comparables have central air conditioning. Comparable #2 also features finished attic area. The comparables sold from May 2018 to December 2019 for prices ranging from \$895,000 to \$1,065,000 or from \$305.40 to \$391.43 per square foot of living area, land included.

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<sup>1</sup> Photographs of the appraisal comparables depict the dwellings as being 2-story dwellings.

The board of review submitted comments critiquing the appraisal report, arguing the comparables properties are under adjusted for finished basement area and that the appraiser failed to address external obsolescence of three comparables. The board of review argued that appraisal comparables #2, #4 and #5 have views of commercial property, not adjusted for by the appraiser. It also contended the basement adjustments were “way too low.” The board of review contended the basement adjustment for comparable #5 should be \$50,000 to \$70,000, however, no documentary evidence to support its claim was submitted. 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 evidence in the record did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted an appraisal and four comparables for the Board’s consideration. The Board finds the appraisal comparable #1 differs from the subject in age and comparable #3 sold in April 2017, less proximate in time to the January 1, 2019 assessment date than other comparable sales in the record. As a result, less weight is given to the opinion of value for the subject as presented in the appraisal. However, the Board shall consider the remaining sales presented in the appraisal. The Board gives less weight to board of review comparables #1, #3 and #4 which differ from the subject in design and/or age when compared to the subject.

The Board finds the best evidence of market value to be appraisal comparables #2, #4 and #5 along with board of review comparable #2 which are similar to the subject in location, age/effective age, design, dwelling size and most features. Although the appraisal comparables lack finished basements and board of review comparable #2 included a finished attic, suggesting upward adjustments for basements and downward adjustment for finished attic are needed to make these comparables more equivalent to the subject. These comparables sold from May 2018 to May 2019 for prices ranging from \$730,000 to \$950,000 or from \$250.00 to \$391.43 per square foot of living area, including land. The subject's assessment reflects a market value of \$947,996 or \$356.93 per square foot of living area, including land, which falls within the range established by the best comparable sales in the record. After considering adjustments to the comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not 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: March 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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COUNTY

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