



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

APPELLANT: Alexander Ayngorn
DOCKET NO.: 19-06397.001-R-1
PARCEL NO.: 16-15-105-018

The parties of record before the Property Tax Appeal Board are Alexander Ayngorn, 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 **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: \$ 49,877
IMPR.: \$193,604
TOTAL: \$243,481

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 single-family dwelling of brick exterior construction with 3,523 square feet of living area.¹ The dwelling was constructed in 2000. Features of the home include a full basement that is 80% finished, central air conditioning, a fireplace and an attached three-car garage containing 690 square feet of building area. The property has an approximately 12,000 square foot site and is located in Highland Park, Moraine Township, Lake County.

¹ The appellant's appraiser provided a detailed schematic drawing to support the dwelling size of 3,523 square feet. The board of review supplied the property record card with a less detailed schematic drawing concluding a dwelling size of 3,495 square feet. The Board finds, comparing the drawings, that the minor 28 square foot discrepancy appears to be due to rounding and details in complex bump out construction of the dwelling and the best evidence of size was presented by the appraiser.

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 \$685,000 as of January 1, 2019. The appraisal was prepared by Larry Dvorkin, a State of Illinois Certified Residential Real Estate Appraiser. In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value with fee simple property rights for purposes of a real estate tax appeal.

As to the subject, the appraiser noted the home was in good overall condition with an average level of maintenance. No recent exterior or interior updates were found, and no major recent improvements were observed at the time of inspection.

In the sales comparison approach, the appraiser detailed four comparable sales. The parcels range in size from 7,635 to 14,325 square feet of land area and are improved with either "Colonial" or "Contemporary" dwellings of brick and frame or brick and stone exterior construction that were 13 to 34 years old. The homes range in size from 2,832 to 3,945 square feet of living area. Each dwelling has a full basement, three of which are finished. The homes feature central air conditioning, one or two fireplaces and a two-car or a three-car garage. The comparables sold from May 2018 to April 2019 for prices ranging from \$605,000 to \$750,000 or from \$153.36 to \$227.75 per square foot of living area, including land. The comparables were located from .51 to 2.41-miles from the subject property. The appraiser noted the comparables were chosen due to recency of sale to January 1, 2019, and similarity to the subject in size, age, utility, quality of construction and overall market appeal. While the subject is located in the northern part of Highland Park, in order to use relevant comparables the one-mile radius was exceeded for some properties.

After making adjustments to the comparables for differences from the subject in site size, quality of construction, age, condition, bathroom count, gross living area, basement finish, number of bedrooms, garage size and/or other amenities, the appraiser estimated the comparables had adjusted prices ranging from \$683,800 to \$692,000, including land. Based on this data, the appraiser estimated the subject had an estimated value of \$685,000 or \$194.44 per square foot of living area, including land.

Based on this evidence, the appellant requested a total reduced assessment of \$228,310 which would reflect a market value of \$684,998 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 \$260,934. The subject's assessment reflects a market value of \$793,354 or \$225.19 per square foot of living area, land included, based upon a dwelling size of 3,523 square feet of living area and 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 response to the appraisal evidence, the board of review contends that appraisal sales #2 and #3 are from different neighborhoods and appraisal sale #2 is significantly smaller in living area square footage than the subject.

In support of its contention of the correct assessment, the board of review submitted a grid analysis with information on four comparable sales, where board of review comparable #1 is the same property as appraisal sale #4, but with a slightly higher reported sale price of \$732,500 or \$203.13 per square foot of living area, including land. The comparables are located in the same assessment neighborhood code as the subject and within .52 of a mile from the subject. The parcels range in size from 13,300 to 15,230 square feet of land area and are improved with two-story dwellings of brick, stucco and stone, or frame and stone exterior construction that were built from 1956 to 2006, with the oldest dwelling having a reported effective age of 1996. The homes range in size from 3,430 to 3,608 square feet of living area. Each dwelling has a full basement with finished area. The homes feature central air conditioning and a garage ranging in size from 460 to 838 square feet of building area. Three of the homes each have one or two fireplaces. The comparables sold from December 2017 to April 2019 for prices ranging from \$732,500 to \$875,500 or from \$203.13 to \$255.25 per square foot of living area, including land.

Based on the foregoing data and an analysis of the appellant's appraisal, the board of review proposed a reduction in the subject's total assessment to \$243,481 which would reflect a market value of approximately \$730,518 or \$207.36 per square foot of living area when using the dwelling size of 3,523 square feet.

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 record evidence establishes that a reduction in the subject's assessment is warranted.

The appellant submitted an appraisal of the subject property and the board of review submitted four comparable sales, one of which is contained in the appellant's appraisal report, in support of their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the value conclusion contained within the appellant's appraisal report as two of the four comparables considered were located distant from the subject property when the record reveals that other comparables closer in proximity were available for consideration in the report. Furthermore, the Board finds appraiser's condition adjustments to sales #3 and #4 appear to be suspicious and was supported only as to sale #3 based on "MLS provided data and interior photos." Therefore, having thoroughly examined the appellant's appraisal report, the Board gives little weight to the value conclusion determined utilizing the sales comparison approach as the appraiser utilized distant comparables, properties that differed in age and/or applied questionable condition adjustments. Given the concerns related to the properties chosen by Dvorkin for the sales comparison approach analysis, the Board finds the appraiser's value conclusion is not a credible or reliable indicator of the subject's estimated market value as of the assessment date. However, the most similar raw sales presented in the appraisal will be analyzed along with the best raw sales presented by the board of review.

The record contains a total of seven comparable sales, with one common property. The Board has given reduced weight to appraisal sales #1, #2 and #3 due to their distant locations from the

subject property and/or differing age when compared to the subject. The Board has given reduced weight to board of review sale #3 due to the 2017 date of sale as compared to other sales in the record that are more proximate to the valuation date and to board of review sale #4 as the sale price appears to be a high-end outlier as compared to other sales in the record.

The best evidence of market value in the record is the common property, appraisal sale #4/board of review sale #1, along with board of review sale #2. These properties are each similar to the subject in location, bracket the subject in age and dwelling size and present similar features to the subject dwelling. These comparables sold in March and April 2019 for prices of \$732,500 and \$789,000 or for \$203.13 and \$226.79 per square foot of living area, including land. The subject's assessment reflects a market value of \$793,354 or \$225.19 per square foot of living area, including land, which is above the range established by the best comparable sales in the record and at the high-end of the range of sales on a per-square-foot basis, which appears to be excessive after considering appropriate adjustments to the best comparables for differences when compared to the subject. Giving due consideration to the proposal by the board of review to reduce the subject's assessment and greatest weight to the common sale in the record, the Board finds a reduction in the subject's assessment is warranted commensurate with the proposal made by the board of review.

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:

April 19, 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

Alexander Ayngorn
3108 Greenwood Ave
Highland Park, IL 60035

COUNTY

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