



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

APPELLANT: Omid Amjadi
DOCKET NO.: 19-06848.001-R-1
PARCEL NO.: 11-29-403-009

The parties of record before the Property Tax Appeal Board are Omid Amjadi, the appellant, by attorney Andrew J. Rukavina, of The Tax Appeal Company in Mundelein, 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: \$55,928
IMPR.: \$187,381
TOTAL: \$243,309

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 brick exterior construction with 4,571 square feet of living area. The dwelling was constructed in 2000. Features of the home include a basement,¹ central air conditioning, two fireplaces, and a 3-car garage. The property has a 12,070 square foot site² and is located in Vernon Hills, Libertyville Township, Lake County.

¹ Both parties describe the subject's basement as unfinished; however, a 2020 listing sheet for the subject presented by the board of review discloses that the subject's basement has finished area. Because both parties have presented the subject as having an unfinished basement for the purposes of this appeal, the Board shall consider the subject's basement to be unfinished.

² The parties differ regarding the subject's lot size. The Board finds the best evidence of the subject's lot size is found in the subject's property record card presented by the board of review.

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 \$700,000 as of January 1, 2019. The appraisal report was prepared as a desktop valuation without any inspection of the subject property.

Under the sales comparison approach to value, the appraiser analyzed the sales of three comparables located within either 0.06 or 0.09 of a mile from the subject property and within the subject's neighborhood. The parcels range in size from 12,270 to 14,547 square feet of land area and are improved with two-story homes ranging in size from 4,172 to 4,554 square feet of living area. The homes range in age from 18 to 22 years old. Each home has a basement with finished area and a 3-car garage. The comparables sold from June 2018 to April 2019 for prices ranging from \$640,000 to \$724,800 or from \$151.62 to \$160.59 per square foot of living area, including land. The appraiser also noted that the subject sold in July 2017 for \$738,000. Based on the appraiser's analysis and giving most weight to appraisal comparables #1 and #2, the appraiser estimated an opinion of market value for the subject of \$700,000 as of January 1, 2019.

Based on this evidence, the appellant requested a reduction in the subject's assessment to \$233,310 which would reflect a market value of \$700,000 or \$153.14 per square foot of living area, including land, 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 \$243,309. The subject's assessment reflects a market value of \$739,766 or \$161.84 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. The board of review's comparables #3 and #4 are the same as appraisal comparables #2 and #1, respectively. The comparables are located from 0.03 to 0.09 of a mile from the subject property and within the same assessment neighborhood code as the subject property. The parcels range in size from 11,980 to 14,550 square feet of land area and are improved with two-story homes of brick exterior construction ranging in size from 4,172 to 4,554 square feet of living area. The dwellings were built from 1997 to 2001. Each home has a basement,³ central air conditioning, and a garage ranging in size from 599 to 640 square feet of building area. Three of the comparables each have one or two fireplaces. The parties' common comparable #4 has an inground swimming pool.⁴ The comparables sold from May 2018 to March 2019 for prices ranging from \$670,000 to \$745,000 or from \$159.16 to \$164.39 per square foot of living area, including land.

³ The appraiser reported that the two common comparables each have a basement with finished area whereas the board of review reported that the two common comparables each have an unfinished basement, which was not disputed by the appellant in written rebuttal.

⁴ The appraiser did not report this comparable to have an inground swimming pool whereas the board of review reported this comparable to have an inground swimming pool, which was not disputed by the appellant in written rebuttal.

The board of review submitted notes asserting that the subject sold in September 2020 for \$742,000, together with a listing sheet for the subject, and that the board of review reduced the subject's assessment accordingly

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 appellant submitted an appraisal and the board of review submitted four comparable sales, two of which are common comparables, to support their respective positions before the Board. The Board has given reduced weight to the value conclusion contained within the appellant's appraisal report as the appraisal omitted pertinent information regarding the comparables, such as an inground swimming pool, and failed to disclose the adjustments made to the appraisal comparables. Thus, having analyzed the appraisal, the Board finds that the report fails to produce a credible and/or reliable indicator of the subject's estimated market value and the Board will consider the raw sales data presented in the appraisal and by the board of review.

The record contains a total of five comparable sales, with two common comparables, for the Board's consideration. The Board gives less weight to appraisal comparable #1/board of review's comparable #4, due to its inground swimming pool which the subject does not feature, and to appraisal comparable #3, due to its finished basement area which the subject does not feature.

The Board finds the best evidence of market value to be appraisal comparable #2/board of review's comparable #3 and the board of review's comparables #1 and #2, which are similar to the subject in dwelling size, location, age, and most features. These most similar comparables sold from May 2018 to March 2019 for prices ranging from \$670,000 to \$745,000 or from \$159.60 to \$164.39 per square foot of living area, including land. The subject's assessment reflects a market value of \$739,766 or \$161.84 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences when compared to 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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