



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

APPELLANT: Sanjay Gandhi
DOCKET NO.: 19-07813.001-R-1
PARCEL NO.: 12-33-412-005

The parties of record before the Property Tax Appeal Board are Sanjay Gandhi, 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: \$68,480
IMPR.: \$133,408
TOTAL: \$201,888

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 1.75-story dwelling of wood siding exterior construction with 2,503 square feet of living area. The dwelling was constructed in 1927 and has an effective year built of 1959. Features of the home include an unfinished basement, central air conditioning, a fireplace and a 528 square foot garage. The property has an approximately 7,200 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 three comparable sales located within 0.99 of a mile from the subject property. The comparables have sites that range in size from 6,790 to 14,230 square feet of land area and are improved with 1-story to 2-story dwellings of frame exterior construction that range in size from 1,119 to 3,222 square feet of living area. The dwellings were built from 1910 to 1953 with the newest comparable having an effective year built of 1972. Each

comparable has a basement with one having finished area. One comparable has central air conditioning and two fireplaces and two comparables each have a garage with either 499 or 576 square feet of building area. The properties sold in June or November 2018 for prices ranging from \$240,000 to \$635,000 or from \$169.55 to \$214.48 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$164,414 which reflects a market value of \$493,291 or \$197.08 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 \$201,888. The subject's assessment reflects a market value of \$613,828 or \$245.24 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 three comparable sales located in the same assessment neighborhood code as the subject property. The comparables have sites that range in size from 6,800 to 8,340 square feet of land area and are improved with 1.75-story or 2-story dwellings of wood siding or stucco exterior construction that range in size from 1,968 to 2,550 square feet of living area. The homes were built from 1910 to 1920 and have an effective year built ranging from 1950 to 1960. Each comparable has a basement with finished area, central air conditioning, one fireplace and a garage ranging in size from 440 to 528 square feet of building area. Comparable #2 has a fully finished attic area. The properties sold from March 2018 to March 2019 for prices ranging from \$625,000 to \$1,000,000 or from \$317.58 to \$401.28 per square foot of living area, land included. 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 appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted six comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #2 and #3 which are substantially smaller than the subject in dwelling size and differ from the subject in effective age. The Board also gives less weight to board of review comparable #3 which, based on sale price per square foot, appears to be an outlier, relative to other comparables in the record.

The Board finds the best evidence of market value to be the remaining comparables which are more similar to the subject in location, age/effective age, dwelling size and other features, although these properties have finished basements suggesting a downward adjustment would be needed to make them more equivalent to the subject. These comparables sold from June 2018 to March 2019 for prices ranging from \$625,000 to \$842,500 or from \$197.08 to \$330.39 per square foot of living area, including land. The subject's assessment reflects a market value of

\$613,828 or \$245.24 per square foot of living area, including land, which falls below the range established by the best comparable sales in this record on an overall basis and within the range on a per square foot basis. After considering appropriate 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:

June 21, 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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