



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

APPELLANT: Pramod & Kusum Gupta  
DOCKET NO.: 19-07861.001-R-1  
PARCEL NO.: 15-06-305-082

The parties of record before the Property Tax Appeal Board are Pramod & Kusum Gupta, the appellants, 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:** \$ 34,490  
**IMPR.:** \$207,153  
**TOTAL:** \$241,643

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 and Dryvit exterior construction with 4,240 square feet of living area. The dwelling was constructed in 2017. Features of the home include a full basement with a 1,740 square foot recreation room, central air conditioning, a fireplace and a 792 square foot garage. The property has a 12,380 square foot site and is located in Long Grove, Vernon Township, Lake County.

The appellants contend overvaluation as the basis of the appeal and seek reductions in both the land and improvement assessments of the subject property. As part of the Residential Appeal petition, the appellants report that \$245,000 was spent on acquisition of the land and \$550,000 was expended on the construction of the dwelling in May 2017 that was suitable for occupancy in October 2017 as shown in the local Certificate of Occupancy supplied with the appeal. Therefore, this data depicts a total cost outlay totaling \$795,000 for the subject property. In support of the overvaluation arguments concerning the land and improvement assessments, the

appellants submitted information across two grid analyses on a total of five improved comparable sales<sup>1</sup> and on one vacant land sale.

As to the single land sale, the appellants report this vacant parcel is located in the subject's neighborhood code and contains 11,332 square feet of land area. The parcel sold in December 2018 for \$65,000 or \$5.74 per square foot of land area.

As to the improved comparable sales, the properties are each located in the same neighborhood code as the subject and within .12 of a mile from the subject. The parcels range in size from 12,576 to 14,677 square feet of land area and are improved with two-story dwellings of frame or brick exterior construction. The homes were built from 2006 to 2012 and range in size from 3,557 to 4,468 square feet of living area. Each comparable has an unfinished basement, central air conditioning, one or two fireplaces and a garage ranging in size from 680 to 900 square feet of building area. The comparables sold from June 2017 to May 2019 for prices ranging from \$575,000 to \$667,000 or from \$141.28 to \$171.21 per square foot of living area, including land.

Based on this evidence, the appellants requested a reduced land assessment of \$25,000 and a reduced improvement assessment of \$185,000 for a total reduced assessment of \$210,000, which would reflect a market value of approximately \$630,063 or \$148.60 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 subject's land assessment of \$34,490 and the improvement assessment of \$207,153 for a total assessment for the subject of \$241,643. The subject's total assessment reflects a market value of \$734,701 or \$173.28 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 two comparable improved sales located in the same assessment neighborhood code as the subject property. The parcels contain 11,630 and 13,870 square feet of land area, respectively, and are each improved with two-story dwellings of brick or brick and stone exterior construction. The homes were built in 2018 and 2015, respectively, and contain 3,650 and 3,702 square feet of living area, respectively. Each comparable has a basement, one of which contains a 1,331 square foot recreation room. Features include central air conditioning, a fireplace and a garage of 713 and 936 square feet of building area, respectively. The comparables sold in January and December 2018 for prices of \$850,000 and \$750,000 or for \$232.88 and \$202.59 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 appellants contend 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

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<sup>1</sup> Due to duplication of properties across the two grids, the Board has renumbered 7248 Greywall (15-06-305-074) as comparable #5 for ease of reference.

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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

Initially, as to the land overvaluation claim, the Board finds that the appellants submitted only one vacant land sale to challenge the estimated market value of the subject parcel. For this 2019 tax year appeal, in order to establish a market value claim challenging the estimated market value of the subject parcel, the evidence should consist of "documentation of not fewer than three recent sales of suggested comparable properties together with documentation of the similarity, proximity and lack of distinguishing characteristics of the sales comparables to the subject property." (86 Ill.Admin.Code §1910.65(c)(4)). With only one comparable vacant land sale for consideration in this appeal, the Board finds that the appellants did not meet the burden of proof and a reduction in the subject's land assessment is not justified.

The parties submitted a total of seven improved comparable sales to support their respective positions before the Property Tax Appeal Board with varying degrees of similarity to the subject in age, dwelling size and/or finished basement area. The improved comparables sold from June 2017 to May 2019 for prices ranging from \$575,000 to \$850,000 or from \$141.28 to \$232.88 per square foot of living area, including land. Furthermore, the appellants reported a total investment in the construction/development of the subject property of approximately \$795,000 as of May 2017. The subject's 2019 tax year assessment reflects a market value of \$734,701 or \$173.28 per square foot of living area, including land, which is within the range established by the improved comparable sales in this record and below the cost to construct reported by the appellants. After considering adjustments to the improved comparable sales for differences in age, dwelling size and/or finished basement area when compared to the subject dwelling, the Board finds a reduction in the subject's assessment is not justified on grounds of overvaluation.

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.

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Chairman



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Member



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Member



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Member



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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: July 19, 2022



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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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