



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

APPELLANT: Jini Goduco
DOCKET NO.: 19-08471.001-R-1
PARCEL NO.: 16-09-213-001

The parties of record before the Property Tax Appeal Board are Jini Goduco, the appellant, by attorney Eric Feldman, of Eric Feldman & Assoc. P.C. in Chicago; 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: \$112,429
IMPR.: \$202,937
TOTAL: \$315,366

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 2-story dwelling of brick exterior construction with 4,549 square feet of living area. The dwelling was constructed in 1964, is 55 years old and has an effective year built of 1972. Features of the home include an unfinished basement, central air conditioning, three fireplaces and a 598 square foot garage. The property has an approximately 21,540 square foot site and is located in Lake Forest, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted two grid analyses with information on six comparable sales located within 0.83 of a mile from the subject. The comparables have sites that range in size from 20,473 to 22,200 square feet of land area¹ and are improved with 1.75-story or 2-story dwellings² of brick

¹ Appellant's comparable #2 was reported to have a site size of 0.47 acres or 20,473 square feet of land area.

² The appellant's second grid reports comparable #2 to be a 1.75-story dwelling.

or frame exterior construction that range in size from 3,142 to 3,985 square feet of living area. The dwellings range in age from 46 to 58 years old. Four comparables have an unfinished basement and two comparables each have a concrete slab foundation. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 420 to 624 square feet of building area. The properties sold from January 2018 to August 2019 for prices ranging from \$500,000 to \$668,500 or from \$156.59 to \$193.41 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$250,204 which reflects a market value of \$750,687 or \$165.02 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 \$315,366. The subject's assessment reflects a market value of \$958,851 or \$210.78 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. Comparable #1 lacked detailed property information and therefore shall not be discussed or analyzed any further. Comparables #2, #3 and #4 are located within 0.42 of a mile from the subject property. The comparables have sites that range in size from 20,060 to 23,320 square feet of land area and are improved with 2-story dwellings of brick or brick and wood siding exterior construction that range in size from 3,704 to 3,842 square feet of living area. The homes were built in 1956 or 1963 with the oldest comparable having an effective year built of 2004. Each comparable has a basement, two with finished area, central air conditioning, one or two fireplaces and a garage with either 484 or 528 square feet of building area. Comparable #2 has an inground swimming pool. The properties sold in March or April 2019 for prices ranging from \$895,000 to \$1,150,000 or from \$232.95 to \$302.95 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 nine comparable sales for the Board's consideration, as one comparable lacked property details. The Board gives less weight to the appellant's comparables #2 and #3 which have concrete slab foundations in contrast to the subject's basement foundation. The Board gives less weight to the appellant's comparables #1, #3, #5 and #6 which are more than 25% smaller in dwelling size when compared to the subject. The Board also gives less weight to the board of review comparable #2 which has a substantially newer effective age when compared to the subject and features an inground swimming pool, which the subject property lacks.

The Board finds the best evidence of market value to be the appellant's comparable #4 and board of review comparables #3 and #4 which are more similar to the subject in location, age, design and other features. However, each of these properties are from 16% to 22% smaller in dwelling size when compared to the subject, suggesting upward adjustments are needed to make them more equivalent to the subject. These three comparables sold from March to August 2019 for prices ranging from \$668,500 to \$1,043,500 or from \$188.42 to \$281.72 per square foot of living area, including land. The subject's assessment reflects a market value of \$958,851 or \$210.78 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. Given the subject's larger dwelling size relative to the best comparables and 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: July 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

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