



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

APPELLANT: James Hugill
DOCKET NO.: 19-08754.001-R-1
PARCEL NO.: 12-21-119-012

The parties of record before the Property Tax Appeal Board are James Hugill, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC 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: \$116,868
IMPR.: \$179,769
TOTAL: \$296,637

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 wood siding exterior construction with 3,121 square feet of living area.¹ The dwelling was constructed in 1896 and is approximately 123 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace and a 480 square foot garage. The property has a 12,400 square foot site and is located in Lake Bluff, Shields Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales located within .21 miles from the subject. The comparables have sites that range in size from 9,300 to 20,730 square feet of land area and are improved with two-story dwellings of stucco or wood siding exterior construction

¹ The Board finds the best description of the subject was the subject's property record card submitted by the board of review.

that are 95 to 130 years old. The dwellings range in size from 2,847 to 4,223 square feet of living area and have unfinished basements. The comparables sold from May 2017 to November 2018 for prices ranging from \$660,000 to \$1,137,500 or from \$231.82 to \$276.17 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$296,637. The subject's assessment reflects a market value of \$901,906 or \$288.98 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 six comparable sales located within .62 miles from the subject. Board of review comparable #2 was submitted twice. The comparables have sites ranging in size from 5,730 to 19,970 square feet of land area and are improved with two-story dwellings of wood siding or brick and wood siding exterior construction that were built from 1882 to 1925 with comparables #1, #3, and #4 having effective ages of 1940 or 1942. The dwellings range in size from 2,844 to 3,557 square feet of living area. Each comparable has a basement with two having a recreation room, central air conditioning, one to three fireplaces and a garage ranging in size from 400 to 690 square feet of building area. The comparables sold from June 2018 to November 2019 for prices ranging from \$857,500 to \$1,750,000 or from \$263.16 to \$491.99 per square foot of living area, including land. 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 record contains ten suggested comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables as #1 and #2 sold in May 2017 which is less proximate in time to the January 1, 2019 assessment date than the other sales in the record and #2, #3 and #4 have significantly larger dwelling sizes when compared to the subject. The Board gives less weight to board of review comparable #1 as it appears to be an outlier which sold considerably higher than the other sales in the record. Reduced weight was also given to board of review comparable #3 and #6 which both have a recreation room in the basement unlike the subject.

The Board finds the best evidence of the subject's market value to be board of review comparables #2, #4 and #5 which sold proximate in time to the assessment date and are relatively similar to the subject in location, age, dwelling size and features. The comparables sold June 2018 and November 2019 for prices ranging from \$857,500 to \$1,200,000 or from \$263.16 to \$356.51 per square foot of living area, including land. The subject's assessment reflects a market value of \$901,906 or \$288.98 per square foot of living area, including land, which falls

within the range established by the best comparable sales in the record. Based on this evidence and after considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the appellant failed to prove by a preponderance of the evidence that a reduction in the subject's assessment is justified based on 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.



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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