



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

APPELLANT: Julia Holem-Gabbard
DOCKET NO.: 20-00164.001-R-1
PARCEL NO.: 07-30-210-030

The parties of record before the Property Tax Appeal Board are Julia Holem-Gabbard, the appellant; and the Lake County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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: \$6,824
IMPR.: \$58,757
TOTAL: \$65,581

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 2020 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 bi-level dwelling of wood siding exterior construction¹ with 1,322 square feet of living area. The dwelling was constructed in 2004 and is approximately 16 years old. Features of the home include a lower level with finished area, central air conditioning, and a 2-car garage. The property has a 5,750 square foot site and is located in Grayslake, Warren Township, Lake County.

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 \$197,000 as of December 31, 2019. The appraisal was prepared by Kristi Rowe and Michael A. Kozenko, a certified residential real estate appraiser.

¹ Additional details regarding the subject property not reported by the appellant are found in the subject's property record card presented by the board of review.

Under the sales comparison approach, the appraisers examined three comparable sales located within 0.75 of a mile from the subject property. The parcels range in size from 5,750 to 8,700 square feet of land area and are improved with one-story or bi-level homes ranging in size from 1,272 to 2,880 square feet of living area. The dwellings range in age from 13 to 78 years old. Two homes each have a lower level with finished area and two homes each have one or two fireplaces. Each home has central air conditioning and a 2-car garage. The comparables sold in May 2018 and October 2019 for prices ranging from \$175,000 to \$201,000 or from \$60.76 to \$154.87 per square foot of living area, including land. The appraisers made adjustments to these comparables for differences from the subject, such as view, age, condition, dwelling size, room count, finished basement area, fireplaces, and other improvements, to determine adjusted sale prices ranging from \$183,000 to \$197,000.

Under the cost approach, the appraisers obtained a land value of \$22,500 by analyzing vacant land sales in the subject's neighborhood and by using the extraction method. The appraisers calculated a replacement cost new for the subject of \$209,350 less depreciation of \$44,582 plus the value of other improvements of \$12,500, resulting in a market value under the cost approach of \$197,300. The appraisers gave little weight to the cost approach due to the subject's age and lack of comparable land sales.

Giving the most weight to the sales comparison approach, the appraisers opined the market value of the subject as of December 31, 2019 was \$197,000.

Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$85,029. The subject's assessment reflects a market value of \$255,419 or \$193.21 per square foot of living area, land included, when using the 2020 three year average median level of assessment for Lake County of 33.29% 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 within 0.48 of a mile from the subject property. The parcels range in size from 6,390 to 12,880 square feet of land area and are improved with one-story dwellings of brick or wood siding exterior construction ranging in size from 997 to 1,300 square feet of living area. The dwellings were built from 1942 to 1966 with comparable #3 having an effective age of 1995. Each home has a basement, two of which have finished area. One home has central air conditioning and two homes each have a garage with either 440 or 528 square feet of building area. The comparables sold from July 2019 to February 2020 for prices ranging from \$197,000 to \$255,000 or from \$153.85 to \$255.77 per square foot of living area, including land.

The board of review also presented a brief arguing that two appraisal sales occurred in 2018 and two appraisal sales differ in design from the subject.

Based on this evidence the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant listed five additional comparable sales in the subject's zip code, which were built from 2003 and 2008 and have from 1,250 to 1,750 square feet of living area. No other details regarding these properties were provided by the appellant.² These comparables sold from March 2019 to November 2020 for prices ranging from \$110,000 to \$182,000.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant presented an appraisal and the board of review presented three comparable sales in support of their respective positions before the Board. The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The board of review's comparables differ significantly from the subject both in design and age. The subject's assessment reflects a market value of \$255,419 or \$193.21 per square foot of living area, including land, which is above the appraised value conclusion of \$197,000 or \$149.02 per square foot of living area, including land. The Board finds the subject property had a market value of \$197,000 as of the assessment date at issue. Since market value has been established the 2020 three year average median level of assessments for Lake County of 33.29% as determined by the Illinois Department of Revenue shall apply. (86 Ill. Admin. Code §1910.50(c)(1)).

² The appellant did not provide sufficient details regarding these comparable sales to conduct a meaningful analysis of their similarity to the subject, and thus, the Board shall not consider these sales further.

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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