



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

APPELLANT: Thomas & Lydia Tedford  
DOCKET NO.: 20-01444.001-R-2  
PARCEL NO.: 16-07-305-008

The parties of record before the Property Tax Appeal Board are Thomas & Lydia Tedford, the appellants, 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:** \$104,811  
**IMPR.:** \$335,632  
**TOTAL:** \$440,443

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 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 2-story dwelling of brick exterior construction with 4,722 square feet of living area. The dwelling was constructed in 2011. Features of the home include a basement, central air conditioning, two fireplaces and a 718 square foot garage. The property has an approximately 23,835 square foot site and is located in Lake Forest, West Deerfield Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted information on five comparable sales with the same assessment neighborhood code as the subject and located within .23 of a mile from the subject property. Comparables #1 through #4 have sites that range in size from 19,800 to 27,560 square feet of land area. No site size was provided for comparable #5. The comparables are improved with 1.75-story or 2-story dwellings of brick or brick and wood siding exterior construction ranging in

size from 3,876 to 4,561 square feet of living area. The dwellings are 27 to 30 years old. The appellant reported that each comparable has basement area, central air conditioning, one to three fireplaces and a garage ranging in size from 682 to 818 square feet of building area. The comparables sold from May 2018 to August 2020 for prices ranging from \$810,000 to \$900,000 or from \$187.75 to \$219.13 per square foot of living area, including land.

Based on this evidence, the appellants requested the subject's total assessment be reduced to \$312,061, which would reflect a market value of \$936,277 or \$198.28 per square foot of living area, including land, when using 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 \$440,443. The subject's assessment reflects a market value of \$1,323,049 or \$280.19 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 presented a copy of the subject's property record card that revealed the subject sold on October 19, 2020 for a price of \$1,625,000. The board of review also submitted a copy of the Multiple Listing Service (MLS) listing sheet indicating the subject property was advertised for sale. The listing sheet depicted that the subject property had been on the market for 12 days with an original asking price of \$1,650,000 and the property was sold by a realtor, Margaret Ludemann of Coldwell Banker Realty.

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 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.

The record contains five comparable sales presented by the appellants, while the board of review presented evidence of the sale of the subject property in October 2020 for a price of \$1,625,000, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the comparable sales presented by the appellants due to significant differences in age and/or dwelling size when compared to the subject.

The Board finds the best evidence of market value in the record to be the purchase of the subject property in October 2020 for a price of \$1,625,000, which was unrefuted by the appellants. The MLS listing sheet provided by the board of review disclosed the subject property had been sold using a realtor and had been on the market for 12 days. Furthermore, the sale of a property during the tax year in question is a relevant factor in considering the validity of the assessment. Rosewell v. 2626 Lakeview Limited Partnership, 120 Ill.App.3d 369, 375 (1<sup>st</sup> Dist. 1983). The

Docket No: 20-01444.001-R-2

Board finds the purchase price is considerably higher than the subject's estimated market value as reflected by the assessment of \$1,323,049.

Based on this record, the Board finds no reduction in the subject's estimated market value as reflected by its assessment is warranted.

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

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:

February 21, 2023



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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Thomas & Lydia Tedford, by attorney:  
Andrew J. Rukavina  
The Tax Appeal Company  
28643 North Sky Crest Drive  
Mundelein, IL 60060

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085