

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:	Srinivasuloo Mandadi
DOCKET NO .:	20-02345.001-R-1
PARCEL NO .:	15-20-201-035

The parties of record before the Property Tax Appeal Board are Srinivasuloo Mandadi, 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 <u>no change</u> 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:	\$ 52,899
IMPR.:	\$137,674
TOTAL:	\$190,573

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 two-story dwelling of wood siding exterior construction with 3,014 square feet of living area. The dwelling was constructed in 1989 and is approximately 31 years old. Features of the home include a partial basement with 975 square feet of finished area, central air conditioning and an attached 704 square foot garage. The property has an approximately 30,090 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located in the same assessment neighborhood code as the subject property. The comparables consist of two-story dwellings of wood siding exterior construction that range in age from 30 to 32 years old. The homes range in size from 2,891 to 3,149 square feet of living

area. Each dwelling has a full or partial basement, two of which have 660 and 975 square feet of finished area, respectively. The homes feature central air conditioning, a fireplace and an attached garage ranging in size from 441 to 765 square feet of building area. The comparables have improvement assessments ranging from \$118,706 to \$134,385 or from \$41.06 to \$42.68 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$127,190 or \$42.20 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$190,573. The subject property has an improvement assessment of \$137,674 or \$45.68 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables located in the same assessment neighborhood code as the subject property. The comparables consist of two-story dwellings of wood siding exterior construction that were built in 1992. The homes each contain 2,999 square feet of living area. Each dwelling has a full basement with finished area ranging in size from 1,305 to 1,649 square feet. The homes feature central air conditioning and an attached garage of either 441 or 704 square feet of building area. Two comparables each have a fireplace and comparable #1 has an inground swimming pool. The comparables have improvement assessments ranging from \$140,985 to \$144,989 or from \$47.01 to \$48.35 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 a total of seven equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #2 and #4 which feature unfinished basements. Additionally, board of review comparable #1 has been given reduced weight as it has an inground swimming pool which is not a feature of the subject property.

The Board finds the best evidence of assessment equity to be appellant's comparables #1 and #3 along with board of review comparables #2 and #3. These four comparables are similar to the subject in location, age, design, size and several features, except that board of review comparables #2 and #3 each feature substantially larger finished basement areas than the subject dwelling. These four comparables have improvement assessments that range from \$118,706 to \$144,989 or from \$41.06 to \$48.35 per square foot of living area. The subject's improvement

assessment of \$137,674 or \$45.68 per square foot of living area falls within the range established by the best comparables in this record and appears to be logical given its greater similarity to the appellant's comparable #1, but for that the subject is a larger dwelling. Based on this record and after considering adjustments to the best comparables in the record when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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:

April 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 <u>PETITION AND</u> <u>EVIDENCE</u> 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

Srinivasuloo Mandadi, by attorney: Robert Rosenfeld Robert H. Rosenfeld and Associates, LLC 33 North Dearborn Street Suite 1850 Chicago, IL 60602

COUNTY

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