



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

APPELLANT: Oleg Linnik
DOCKET NO.: 20-03565.001-R-1
PARCEL NO.: 15-36-209-009

The parties of record before the Property Tax Appeal Board are Oleg Linnik, the appellant, by attorney Ronald Kingsley of Lake County Real Estate Tax Appeal, LLC in Lake Forest, 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: \$63,486
IMPR.: \$134,094
TOTAL: \$197,580

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 is improved with a two-story dwelling of wood siding exterior construction that was built in 1996 and contains 3,120 square feet of living area. Features of the home include an unfinished full basement, central air conditioning, one fireplace and an attached 3-car garage with 673 square feet of building area. The property has a site with approximately 10,620 square feet of land area located in Riverwoods, Vernon 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 improved with two-story dwellings of frame construction that range in size from 2,922 to 3,411 square feet of living area. The homes were built in 1995 and 1996. Each comparable has a basement with two having finished area, central air conditioning, one or two fireplaces and an attached garage ranging in size from 464 to 642 square feet of building area. These properties are located from .21 to .25 of one mile from

the subject and have sites ranging in size from 9,203 to 11,158 square feet of land area. These comparables sold from May 2019 to April 2020 for prices ranging from \$470,000 to \$635,000 or from \$154.30 to \$207.05 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$170,751.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$197,580. The subject's assessment reflects a market value of \$593,512 or \$190.23 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 with comparables #1 and #2 being the same properties as appellant's comparables #3 and #4, respectively.¹ Board of review comparable #3 is improved with a two-story dwelling of wood siding exterior construction built in 1995 containing 3,245 square feet of living area. The dwelling has a partial basement with finished area, central air conditioning, and an attached garage with 600 square feet of building area. The comparable is located approximately .10 mile from the subject property. This property sold in August 2019 for a price of \$638,000 or \$196.61 per square foot of living area, including land.

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 information on five comparable sales to support their respective positions with two comparables being common to the parties. All the comparables are relatively similar to the subject in location, style, size age and features with the exception three have finished basement area, unlike the subject property, and one has no fireplace, dissimilar to the subject in this feature. The Board gives less weight to appellant's comparable #1 as the price of this property appears to be an outlier when contrasted with the remaining comparables in the record. The Board gives most weight to appellant's comparables #2 through #4 and board of review comparables #1 through #3, which includes the two common sales. These properties sold from May 2019 to August 2019 for prices ranging from \$605,000 to \$638,000 or from \$180.30 to \$207.05 per square foot of living area, land included. The subject's assessment reflects a market value of \$593,512 or \$190.23 per square foot of living area, including land, which is below the overall price range but within the range on a per square foot of living area basis. Based on this evidence the Board finds the assessment of the assessment of the subject property as established by the board of review is correct and a reduction in the subject's assessment is not justified.

¹ The grid analysis provided by the board of review listed four comparables, however, comparables #2 and #4 are duplicates.

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:

December 20, 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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