



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Samrat Mukherjee
DOCKET NO.: 20-03732.001-R-1
PARCEL NO.: 15-16-104-018

The parties of record before the Property Tax Appeal Board are Samrat Mukherjee, the appellant, by attorney Eric Feldman of Eric Feldman & Assoc., P.C., 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: \$ 28,144
IMPR.: \$154,123
TOTAL: \$182,267

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 and brick exterior construction containing 2,785 square feet of living area. The dwelling was built in 1994 and is approximately 26 years old. Features of the home include a full basement finished with a 1,062 square foot recreation room, central air conditioning, one fireplace and an attached garage with 484 square feet of building area. The property has a 14,330 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted sales information on five comparables improved with two-story dwellings of wood siding exterior construction ranging in size from 2,347 to 3,281 square feet of living area that are situated on sites that contain from 8,710 to 10,890 square feet of land area. The homes were built from 1992 to 1994. The comparables have a full basement with two having finished

recreation rooms of 907 square feet, central air conditioning, one fireplace and an attached garage ranging in size from 441 to 507 square feet of building area. These properties are located from approximately 643 to 1,592 feet from the subject property. The comparables sold from March 2019 to June 2020 for prices ranging from \$455,000 to \$626,000 or from \$166.78 to \$204.52 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 \$182,267. The subject's assessment reflects an estimated market value of \$547,513 or \$196.59 per square foot of living area including land when applying Lake County's 2020 three-year average median level of assessment 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 sales information on five comparable properties. Two comparables were also utilized by the appellant. The comparables are improved with two-story dwellings of wood siding or brick and wood siding exterior construction ranging in size from 2,565 to 2,866 square feet of living area that are situated on sites that contain from 8,710 to 11,050 square feet of land area. The homes were built from 1992 to 1995. Four comparables have a full unfinished basement and one comparable has a partial basement with a 669 square foot finished recreation room. Four comparables have central air conditioning; three comparables have a fireplace; and each comparable has an attached garage ranging in size from 441 to 921 square feet of building area. One comparable has a metal utility shed. These properties are located from approximately 643 to 1,592 feet from the subject property. The comparables sold from April to August of 2019 for prices ranging from \$478,000 to \$630,000 or from \$166.78 to \$222.30 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). National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3rd Dist. 2002). 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 has not met this burden of proof and no reduction in the subject's assessment is warranted.

The parties submitted information on a total of eight comparable sales with two common comparables. The Board gives little weight to appellant's comparables #2, #3 and #4 because they are less similar in dwelling size when compared to the subject being from 14% smaller to 16% larger than the subject. The Board finds the five remaining comparables, including the two common comparables, are most similar to the subject in location, design, age, dwelling size and most features. However, each comparable has a smaller site size and four comparables have inferior unfinished basements when compared to the subject, requiring upward adjustments to be more equivalent to the subject. These comparables sold from April to August of 2019 for prices ranging from \$478,000 to \$630,000 or from \$166.78 to \$222.30 per square foot of living area including land. The subject's assessment reflects an estimated market value of \$547,513 or

\$196.59 per square foot of living area including land, which falls within the range established by the most similar comparable sales contained in this record. After considering adjustments to the most similar comparables for differences when compared to the subject, the Board finds the assessment of the subject property as established by the board of review is correct and no reduction in the subject's assessment is justified based on a preponderance of the evidence.

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:

C E R T I F I C A T I O N

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:

October 18, 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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