



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

APPELLANT: Shubhanker Chowdhury
DOCKET NO.: 20-03885.001-R-1
PARCEL NO.: 15-21-207-011

The parties of record before the Property Tax Appeal Board are Shubhanker Chowdhury, 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: \$34,311
IMPR.: \$127,260
TOTAL: \$161,571

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 2,475 square feet of living area. The dwelling was constructed in 1996. Features of the home include a basement that is finished with a recreation room, central air conditioning, a fireplace and a 506 square foot garage. The property has an approximately 9,150 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 information on three comparable sales with the same assessment neighborhood code as the subject and located within .61 of a mile from the subject property. The comparables have sites that range in size from 10,019 to 13,504 square feet of land area. The comparables are improved with two-story dwellings of frame exterior construction ranging in size from 2,593 to 2,861 square feet of living area. The dwellings were built from 1996 to 1998.

Each comparable has a basement that is are finished with a recreation room, central air conditioning and a garage ranging in size from 483 to 736 square feet of building area. Comparable #1 has one fireplace. The comparables sold from February 2018 to June 2020 for prices ranging from \$464,000 to \$540,000 or from \$162.18 to \$205.09 per square foot of living area, including land. The appellant also provided the listing sheet for comparable #3.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$151,785, which would reflect a market value of \$455,401 or \$184.00 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 \$161,571. The subject's assessment reflects a market value of \$485,344 or \$196.10 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, where comparables #2 and #3 are the same properties as the appellant's comparables #3 and #2, respectively, which were previously described. As to board of review comparable #1, the property is located within .14 of a mile from the subject property. The site contains 12,630 square feet of land area and is improved with a two-story dwelling of wood siding exterior construction. The dwelling was built in 1997 and has 2,988 square feet of living area, a basement that is finished with a recreation room, central air conditioning, one fireplace and a 736 square foot garage. The comparable sold in August 2019 for \$600,000 or \$200.80 per square foot of living area, including land.

The board of review argued the appellant's comparable #1 sold in 2018. The board of review noted the county and appellant's share sales at 2321 Madiera Ln. and 2176 Avalon Ct. The board of review asserted that its third sale in the subject's subdivision, county comparable #1, supports the assessment, as does 2321 Madiera Ln.

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

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 record contains four suggested comparable sales for the Board's consideration, as two sales were common to both parties. The Board has given less weight to the appellant's comparable #1 and board of review comparable #1 due to their larger dwelling sizes when compared to the subject. Furthermore, the appellant's comparable #1 sold 22 months prior to the assessment date

at issue, and thus is less likely to be indicative of the subject's market value as of January 1, 2020.

The Board finds the best evidence of market value to be the parties' two common comparables, which are similar to the subject in location, dwelling size, design, age and some features. These two comparables sold in May 2020 and June 2020 for prices of \$465,000 and \$540,000 or for \$179.33 and \$205.09 per square foot of living area, including land. The subject's assessment reflects a market value of \$485,344 or \$196.10 per square foot of living area, including land, which is bracketed by the two best comparable sales in the record both in terms of overall market value and on a price per square foot basis. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, 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

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