



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

APPELLANT: Cheryl Sullivan
DOCKET NO.: 20-04228.001-R-1
PARCEL NO.: 12-28-406-002

The parties of record before the Property Tax Appeal Board are Cheryl Sullivan, 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: \$240,655
IMPR.: \$404,458
TOTAL: \$645,113

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 2-story dwelling of wood siding exterior construction with 7,478 square feet of living area. The dwelling was constructed in 1901. Features of the home include a basement with a recreation room,¹ central air conditioning, four fireplaces and a 952 square foot attached garage. The property has an approximately 46,170 square foot site and is located in Lake Forest, Shields 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 located from .49 of a mile to 2 miles from the subject property, two of which have the same assessment neighborhood code as the

¹ The Board finds the best description of the subject is found in the subject's property record card presented by the board of review, which revealed the subject dwelling was remodeled in 1991 and has four fireplaces and a 1,453 square foot basement recreation room, which was not refuted by the appellant.

subject. The comparables have sites that range in size from 54,014 to 70,132 square feet of land area. The comparables are improved with 2-story or 2.5-story dwellings ranging in size from 5,413 to 6,195 square feet of living area. The dwellings were built from 1900 to 1930. The appellant reported that each comparable has an unfinished basement, central air conditioning, a fireplace and a garage ranging in size from 360 to 1,000 square feet of building area. The comparables sold from March 2019 to February 2020 for prices ranging from \$815,000 to \$1,740,000 or from \$131.56 to \$299.90 per square foot of living area, including land. The appellant's counsel noted differences between the comparables and the subject. Based on this evidence, the appellant requested the subject's assessment be reduced to \$573,256, which would reflect a market value of \$1,719,940 or \$230.00 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 \$645,113. The subject's assessment reflects a market value of \$1,937,858 or \$259.14 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 located within .75 of a mile from the subject property, two of which have the same assessment neighborhood code as the subject. The comparables have sites that range in size from 29,180 to 55,760 square feet of land area. The comparables are improved with a 1.75-story dwelling, a 2-story dwelling and a 2.5-story dwelling of wood siding or wood siding and brick exterior construction ranging in size from 5,322 to 6,861 square feet of living area. The dwellings were built in 1903 or 1925. The comparables each have an unfinished basement, central air conditioning, two or three fireplaces and a garage ranging in size from 420 to 925 square feet of building area. The comparables sold from December 2019 to May 2020 for prices of \$2,000,000 and \$2,200,000 or from \$320.65 to \$413.38 per square foot of living area, including land. 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 six suggested comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparable #1 due to its distant location from the subject being 2 miles away. The Board has also given less weight to the appellant's comparable #2 and board of review comparables #2 and #3 which are less similar in dwelling size than the remaining comparables in the record.

The Board finds the best evidence of market value to be the appellant's comparable #3 and board of review comparable #1, which are similar to the subject in location. However, the Board finds both comparables are inferior to the subject in dwelling size and features. Nevertheless, the comparables sold in May 2019 and December 2019 for prices of \$1,740,000 and \$2,200,000 or for \$299.90 and \$320.65 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$1,937,858 or \$259.14 per square foot of living area, including land, which is bracketed by the two best comparable sales in the record in terms of overall market value but below both comparables on a price per square foot basis, which appears to be logical given its larger dwelling size. After considering adjustments to the 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



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:

September 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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