



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

APPELLANT: John Frels
DOCKET NO.: 20-04879.001-R-1
PARCEL NO.: 11-21-219-038

The parties of record before the Property Tax Appeal Board are John Frels, 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: \$72,964
IMPR.: \$268,669
TOTAL: \$341,633

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 frame exterior construction with 3,915 square feet of living area that was constructed in 2005. Features of the home include an unfinished basement, central air conditioning, three fireplaces and a 710 square foot garage. The property has an approximately 8,699 square foot site and is located in Libertyville, Libertyville 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 in the same assessment neighborhood code as the subject property. The comparables have sites that range in size from 8,301 to 8,708 square feet of land area and are improved with two-story dwellings of frame or brick and frame exterior construction that range in size from 3,196 to 4,394 square feet of living area. The dwellings were built from 2002 to 2006. Each comparable has a basement, central air

conditioning, one to four fireplaces and a garage ranging in size from 504 to 773 square feet of building area. The properties sold in May 2020 for prices ranging from \$715,000 to \$900,000 or from \$204.82 to \$242.78 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$296,206 which reflects a market value of \$888,707 or \$227.00 per square foot of living area, land included, when applying 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 \$341,633. The subject's assessment reflects a market value of \$1,026,233 or \$262.13 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 four comparable sales located within 0.30 of a mile from the subject property. The comparables have sites that range in size from 7,500 to 9,179 square feet of land area and are improved with two-story dwellings of frame exterior construction that range in size from 3,037 to 3,239 square feet of living area. The homes were built from 1900 to 2008 with the oldest home having an effective age of 2005. Each comparable has a basement, central air conditioning, two or four fireplaces and a garage ranging in size from 530 to 616 square feet of building area. Comparables #1 and #2 have finished attic area. The properties sold from June 2018 to June 2019 for prices ranging from \$840,000 to \$1,005,000 or from \$274.33 to \$314.55 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 seven comparable sales for the Board's consideration. The Board gives less weight to board of review comparables #3 and #4 which sold in 2018, less proximate to the January 1, 2020 assessment than other properties in the record and/or differ from the subject in age.

The Board finds the best evidence of market value to be the appellant's comparables along with board of review comparables #1 and #2 which are more similar to the subject in location, age, design and other features, although four of these five best comparables are smaller in dwelling size when compared to the subject. These comparables sold from May 2019 to May 2020 for prices ranging from \$715,000 to \$1,005,000 or from \$204.82 to \$314.55 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,026,233 or \$262.13 per square foot of living area, including land, which falls above the range established by the best comparable sales in this record on an overall value basis and within the range on a per square

foot basis. Given the subject's larger dwelling size when compared to the best comparables, a higher overall market value appears to be logical. After considering appropriate adjustments to the comparables for differences from the subject, the Board finds the subject's assessment is justified, and a reduction in the subject's assessment is not 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: March 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

John Frels, by attorney:
Ronald Kingsley
Lake County Real Estate Tax Appeal, LLC
13975 W. Polo Trail Drive
#201
Lake Forest, IL 60045

COUNTY

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