



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

APPELLANT: W. Michael Ley  
DOCKET NO.: 20-05285.001-R-1  
PARCEL NO.: 12-32-309-010

The parties of record before the Property Tax Appeal Board are W. Michael Ley, 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 **A Reduction** 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:** \$86,600  
**IMPR.:** \$120,361  
**TOTAL:** \$206,961

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 3,152 square feet of living area. The dwelling was constructed in 1985. Features of the home include a basement with finished area, central air conditioning, two fireplaces, and a 576 square foot garage.<sup>1</sup> The property has an approximately 42,028 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 six comparable sales. The comparables are located from 0.33 of a mile to 1.09 miles from the subject property and within the same assessment

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<sup>1</sup> The parties differ regarding the subject's basement finish and number of fireplaces. The Board finds the best evidence of these features and amenities is found in the subject's property record card presented by the board of review.

neighborhood code as the subject property. The parcels range in size from 20,168 to 77,972 square feet of land area and are improved with 1-story, 1.75-story, or 2-story homes ranging in size from 2,660 to 3,643 square feet of living area. The dwellings were built from 1964 to 1987. Each home has a basement, central air conditioning, a fireplace, and a garage ranging in size from 506 to 660 square feet of building area. The comparables sold from May 2019 to July 2020 for prices ranging from \$530,000 to \$927,500 or from \$178.57 to \$254.60 per square foot of living area, including land.

The appellant submitted a brief contending that five of the six comparables have a larger land value than the subject and all of the comparables are similar to the subject in condition, age, and dwelling size.

Based on this evidence, the appellant requested a total assessment of \$206,961 which would reflect a market value of \$620,945 or \$197.00 per square foot of living area, including land, at 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 \$254,650. The subject's assessment reflects a market value of \$764,944 or \$242.69 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 where comparable #2 is the same property as appellant's comparable #5. The comparables are located from 0.67 of a mile to 1.08 miles from the subject property and within the same assessment neighborhood code as the subject property. The parcels range in size from 21,800 to 32,520 square feet of land area and are improved with 1.75-story or 2-story homes of brick or wood siding exterior construction ranging in size from 2,660 to 3,784 square feet of living area. The dwellings were built from 1966 to 1979. Each home has a basement, central air conditioning, two or three fireplaces, and a garage ranging in size from 529 to 660 square feet of building area. The comparables sold from July 2018 to November 2020 for prices ranging from \$615,000 to \$927,500 or from \$204.32 to \$254.92 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains a total of nine comparable sales, with one common comparable, for the Board's consideration. The Board gives less weight to the appellant's comparable #1, the

appellant's comparable #5/board of review's comparable #2, the board of review's comparables #1 and #3, due to differences from the subject in dwelling size and/or lot size. The Board gives less weight to the appellant's comparable #6, which has a one-story home compared to the subject's two-story home and has a much larger lot than the subject. The Board gives less weight to the board of review's comparable #4 due to its sale date in July 2018 being more remote in time from the January 1, 2020 assessment date than the other comparables in this record.

The Board finds the best evidence of market value to be the appellant's comparables #2, #3, and #4, which are similar to the subject in dwelling size, design, lot size, location, and some features. These most similar comparables sold from May 2019 to June 2020 for prices ranging from \$560,000 to \$674,500 or from \$185.19 to \$230.91 per square foot of living area, including land. The subject's assessment reflects a market value of \$764,944 or \$242.69 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment commensurate with the appellant's request is justified.

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:

April 19, 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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COUNTY

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