



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

APPELLANT: Kate Stoller  
DOCKET NO.: 20-05526.001-R-1  
PARCEL NO.: 16-10-316-017

The parties of record before the Property Tax Appeal Board are Kate Stoller, 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:** \$58,463  
**IMPR.:** \$82,354  
**TOTAL:** \$140,817

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 frame and brick exterior construction with 3,887 square feet of living area. The dwelling was constructed in 1961. Features of the home include a concrete slab foundation, central air conditioning, a fireplace and a 528 square foot garage. The property has a 16,793 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on June 3, 2019 for a price of \$423,000, the parties to the transaction were not related, the property was sold by a realtor, and it advertised for sale through the Multiple Listing Service (MLS) for 241 days. To document the sale, the appellant submitted the Settlement Statement, MLS sheet, and Listing & Property

History Report. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$141,648. The subject's assessment reflects a market value of \$425,497 or \$109.47 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 response to the appeal, the board of review asserted the subject was granted the purchase price in 2019 and the 2020 assessment was calculated by applying the 2020 equalization factor to the 2019 purchase price.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales located within .58 of a mile from the subject. The properties have sites ranging in size from 12,900 to 19,960 square feet of land area and are improved with 2-story dwellings of brick and wood siding exterior construction ranging in size from 3,199 to 3,686 square feet of living area. The dwellings were built from 1956 to 1972. Three comparables have basements with finished area and two comparables have crawl space foundations. Each comparable has central air conditioning and a garage ranging in size from 420 to 675 square feet of building area. Three comparables each have one fireplace. Comparable #4 has an inground swimming pool. The comparables sold from April 2019 to October 2020 for prices ranging from \$462,000 to \$662,000 or from \$144.42 to \$195.34 per square foot of living area, land included. The board of review's evidence also disclosed the subject sold in June 2019 for \$423,000. Based on this evidence, the board of review requested that 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 met this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be the purchase of the subject property in June 2019 for a price of \$423,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a Realtor, the property had been advertised on the open market with the Multiple Listing Service and it had been on the market for 241 days. In further support of the transaction the appellant submitted a copy of the settlement statement, Multiple Listing Service sheet, and the Listing & Property History report. The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction.

The Board gave less weight to board of review comparables #1, #2 and #5 which have basements with finished area unlike the subject's crawl space foundation. Furthermore, the comparable sales provided by the board of review do not overcome the arm's length sale price of the subject.

Based on this record the Board finds the subject property had a market value of \$423,000 as of January 1, 2020. Since market value has been determined the 2020 three-year average median level of assessment for Lake County of 33.29% shall apply. 86 Ill.Admin.Code §1910.50(c)(1).

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 18, 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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COUNTY

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