



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

APPELLANT: James Lehman
DOCKET NO.: 20-05546.001-C-1
PARCEL NO.: 11-20-201-017

The parties of record before the Property Tax Appeal Board are James Lehman, 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: \$73,608
IMPR.: \$97,063
TOTAL: \$170,671

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 2,179 square foot office building that was built in 2004. The property has an 18,248 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 five comparable sales located in Libertyville. Three parcels are reported to range in size from 12,632 to 24,394 square feet of land area. The comparables are improved with office buildings or office condominium units ranging in size from 1,200 to 5,000 square feet of building area. The buildings are reported to have been constructed from 1900 to 1998 with the oldest comparable having a reported effective age of 1998. The comparables sold from February 2018 to July 2020 for prices ranging from \$220,000 to

\$530,000 or from \$69.80 to \$186.67 per square foot of building area, including land. Based on this evidence the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$170,671. The subject's assessment reflects a market value of \$512,679 or \$235.28 per square foot of building 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 in Libertyville or Lake Forest. The parcels range in size from 20,909 to 64,848 square feet of land area and are improved with office buildings ranging in size from 2,460 to 9,700 square feet of building area. Three buildings were constructed from 1976 to 2004. The comparables sold from March 2020 to January 2021 for prices ranging from \$750,000 to \$3,400,000 or from \$149.88 to \$350.52 per square foot of building area, including land. Based on this evidence the board of review requested the subject's assessment be sustained.

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 a total of nine comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #4 and #5, which are condominium units unlike the subject. The Board gives less weight to the board of review's comparables #2 and #3, which are significantly larger buildings than the subject. The Board gives less weight to the appellant's comparable #3 and the board of review's comparable #1, which are substantially older buildings than the subject.

The Board finds the best evidence of market value to be the appellant's comparables #1 and #2 and the board of review's comparable #4, which are more similar to the subject in building size but have varying degrees of similarity to the subject in age and site size. These most similar comparables sold for prices ranging from \$408,000 to \$750,000 or from \$113.27 to \$176.67 per square foot of living area, including land. The subject's assessment reflects a market value of \$512,679 or \$235.28 per square foot of living area, including land, which is within the range established by the best comparable sales in terms of total market value but above the range on a price per square foot basis, which is logical given the subject is newer and slightly smaller building than the best comparables. 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 is not 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:

May 16, 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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