



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

APPELLANT: Tom O'Rourke  
DOCKET NO.: 21-00235.001-R-1  
PARCEL NO.: 14-18-212-031

The parties of record before the Property Tax Appeal Board are Tom O'Rourke, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, Ltd. in Chicago; 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:** \$13,672  
**IMPR.:** \$141,835  
**TOTAL:** \$155,507

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 2021 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 brick and wood siding exterior construction with 2,814 square feet of living area. The dwelling was constructed in 2006. Features of the home include a basement with finished area,<sup>1</sup> central air conditioning, a fireplace, and a 792 square foot 3-car garage. The property has an approximately 10,400 square foot site and is located in Lake Zurich, Ela Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$417,000 as of January 1, 2019. The appraisal was prepared by Gregory Khorolinsky, a certified residential real estate appraiser.

---

<sup>1</sup> The Board finds the best evidence of the subject's basement finish is found in the appellant's appraisal which contains photographs of the subject home's interior.

Under the sales comparison approach, the appraiser selected three comparable sales located from 0.54 of a mile to 1.36 miles from the subject. The parcels range in size from 9,754 to 11,539 square feet of land area and are improved with homes ranging in size from 2,723 to 2,931 square feet of living area. The dwellings are 31 or 42 years old. Each home has a basement, two of which have finished area, central air conditioning, one or two fireplace, and a 2-car garage. The comparables sold from May to July 2018 for prices ranging from \$405,000 to \$417,500 or from \$142.44 to \$151.30 per square foot of living area, including land. The appraiser made adjustments to the comparables for differences from the subject, such as age, dwelling size, basement finished area, and garage size, and fireplace count, to arrive at adjusted sale prices ranging from \$415,500 to \$432,500. Based on the foregoing, the appraiser opined a market value for the subject of \$417,000 as of January 1, 2019.

Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$155,507. The subject's assessment reflects a market value of \$467,690 or \$166.20 per square foot of living area, land included, when using the 2021 three year average median level of assessment for Lake County of 33.25% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales located within 0.94 of a mile from the subject. The parcels range in size from 6,030 to 16,550 square feet of land area and are improved with 2-story homes of wood siding, brick, or wood siding and brick exterior construction ranging in size from 2,366 to 3,510 square feet of living area. The dwellings were built from 1986 to 2014. Each home has a basement, one of which is a walkout basement, central air conditioning, a fireplace, and a garage ranging in size from 480 to 735 square feet of building area. The comparables sold from February to December 2021 for prices ranging from \$420,000 to \$660,000 or from \$148.15 to \$232.56 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 appellant presented an appraisal and the board of review presented five comparable sales for the Board's consideration. The Board gives less weight to the value conclusion stated in the appraisal, which states an opinion of value as of January 1, 2019 rather than the assessment date and relies on three comparable sales occurring in 2018, which are more remote from the assessment date and less likely to be reflective of market value as of that date.

The Board finds the best evidence of market value to be the board of review's comparables #3 and #4, which are similar to the subject in dwelling size, age, location, site size, and features. The Board gave less weight to the board of review's comparables #1, #2, and #5, due to substantial differences from the subject in dwelling size or age. The two most similar comparables sold for prices of \$630,000 and \$660,000 or for \$193.73 and \$232.56 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$467,690 or \$166.20 per square foot of living area, including land, which is below the range established by the best comparable sales in the 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 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: June 27, 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

Tom O'Rourke, by attorney:  
Scott Shudnow  
Shudnow & Shudnow, Ltd.  
77 West Washington Street  
Suite 1620  
Chicago, IL 60602

COUNTY

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