



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

APPELLANT: Jason Zissman
DOCKET NO.: 21-01337.001-R-1
PARCEL NO.: 06-18-429-020

The parties of record before the Property Tax Appeal Board are Jason Zissman, the appellant, by attorney Gregory Riggs, of Tax Appeals Lake County in Lake Zurich; 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: \$6,532
IMPR.: \$34,977
TOTAL: \$41,509

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 ranch-style dwelling of vinyl siding exterior construction with 975 square feet of living area. The dwelling was built in 1973. Features of the home include an unfinished basement and central air conditioning. The property has an approximately 4,530 square foot site and is located in Round Lake Beach, Avon 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 with the same assessment neighborhood code as the subject property. The properties have sites that range in size from 4,600 to 7,410 square feet of land area. The comparables are improved with ranch-style dwellings with vinyl siding or wood siding exterior construction ranging in size from 949 to 1,056 square feet of living area. The dwellings were built from 1971 to 1973. Each comparable has a basement with four having finished area and central air conditioning. The comparables

sold from June 2019 to February 2020 for prices ranging from \$78,500 to \$117,000 or ranging from \$80.51 to \$121.18 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$33,663 to reflect an approximate market value of \$100,999 or \$103.59 per square foot of living area, land included, 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 \$41,509. The subject's assessment reflects a market value of \$124,839 or \$128.04 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 with the same assessment neighborhood code as the subject property. The properties have sites that range in size from 5,000 to 6,530 square feet of land area. The comparables are improved with ranch-style dwellings with vinyl siding or wood siding exterior construction with 975 square feet of living area. The dwellings were built from 1970 to 1973. Each comparable has a basement with two having finished area and central air conditioning. One comparable has one fireplace. Four comparables each have a garage that ranges in size from 528 to 624 square feet of building area. The comparables sold from October 2020 to January 2021 for prices ranging from \$170,000 to \$180,000 or from \$174.36 to \$184.62 per square foot of living area, land included. The board of review also disclosed in the grid analysis that the subject property sold in August 2021 for a price of \$122,700 or \$125.85 per square foot of living area, but provided no other documentary support for this sale. 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.

Initially, the Board gives diminished weight to the board of review disclosure that the subject property sold in August 2021 for a price of \$122,700 or \$125.85 per square foot of living area. The board of review provided no additional evidence to support this sale, such as a Multiple Listing Service data sheet or a PTAX-203, Illinois Real Estate Transfer declaration, to indicate that this property had been exposed to the open market which brings into question the armlength nature of this sale.

The record contains a total of ten comparable sales submitted by the parties in support of their respective positions. The Board gave less weight to the appellant's comparables #1, #2, #3 and #5 as well as board of review comparables #1, #2, #4, and #5 which have basement finish and/or have a garage, both features the subject lacks. Additionally, the four aforementioned appellant

comparables have 2019 sales dates which occurred less proximate in time to the subject's January 1, 2021 assessment date than the other comparables in this record.

The Board finds the best evidence of market value to be the appellant's comparable #4 and board of review comparable #3 which are identical or similar to the subject in location, design, age, dwelling size, and other features. These two properties sold in February 2020 and January 2021 for prices of \$117,000 and \$170,000 or of \$110.80 and \$174.36 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$124,839 or \$128.04 per square foot of living area, land included, which is bracketed by the two best comparable sales in this record. Based on this record and after considering adjustments to the two best comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by the assessment is supported and 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:

October 17, 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

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