



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

APPELLANT: Kory Ryan  
DOCKET NO.: 21-01465.001-R-1  
PARCEL NO.: 05-15-104-073

The parties of record before the Property Tax Appeal Board are Kory Ryan, 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:** \$30,928  
**IMPR.:** \$55,813  
**TOTAL:** \$86,741

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 1-story dwelling of frame exterior construction with 1,204 square feet of living area.<sup>1</sup> The dwelling was constructed in 2006. Features of the home include a crawl space foundation, central air conditioning, one fireplace and a 560 square foot garage. The property has an approximately 12,955 square foot site and is located in Fox Lake, Grant Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales located within the same assessment neighborhood code as the subject property and from 0.07 of a mile to 1.13 miles from the subject. The comparables have sites ranging in size from 8,682 to 18,461 square feet of land

---

<sup>1</sup> The Board finds the best description of the subject property is found in the subject's property record card submitted by the board of review.

area. The comparables are improved with 1-story dwellings of frame exterior construction ranging in size from 1,392 to 1,881 square feet of living area. The dwellings were built from 1950 to 1968 with effective years built from 1955 to 1987. One comparable has a walkout basement with finished area. Each comparable has central air conditioning. Two comparables each have one fireplace. Two comparables each have a garage with either 273 or 560 square feet of building area. Comparable #2 has 222 square feet of finished attic area. The properties sold from August 2018 to March 2020 for prices ranging from \$150,000 to \$385,000 or from \$107.76 to \$205.92 per square foot of living area, land included. Based on this evidence, the appellant requested a reduced total assessment of \$79,992 which would reflect a market value of \$240,000 or \$199.34 per square foot of living area, land included, when applying 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 \$86,741. The subject's assessment reflects a market value of \$260,875 or \$216.67 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 response to the appeal, the board of review submitted valuation worksheets for the appellant's comparables and a Multiple Service listing datasheet for the appellant's comparable sale #3. The datasheet for the appellant's comparable sale #3 indicates "property will be sold as-is" and contains handwritten comments that the comparable property needs interior work. Handwritten notes on the grid analysis state that the subject is "the newest home built in an older neighborhood."

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located within the same assessment neighborhood code as the subject property and from 0.01 of a mile to 1.09 miles from the subject. The comparables have sites ranging in size from 8,311 to 16,309 square feet of land area. The comparables are improved with 1-story dwellings of frame exterior construction ranging in size from 1,050 to 2,095 square feet of living area. The dwellings were built from 1955 to 1974 with comparables #1 and #3 having effective years built of 1988 and 1985, respectively. Two comparables each have a walkout basement with finished area. Each comparable has central air conditioning and one or two fireplaces. One comparable has a garage with 690 square feet of building area. These properties sold from August 2020 to May 2021 for prices ranging from \$330,000 to \$515,000 or from \$233.05 to \$375.24 per square foot of living area, land included. 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 parties submitted seven comparable sales for the Board's consideration, none of which are truly similar to the subject as all are considerably older dwellings than the subject with varying degrees of similarity in other features. Nevertheless, the Board gives reduced weight to the appellant's comparables and board of review comparable #2 which differ from the subject in dwelling size and/or which sold in 2018 and 2019, less proximate in time to the subject's January 1, 2021 assessment date at issue than other comparables in this record and thus are less likely to be reflective of market value.

The Board finds the best evidence of market value to be the sale for board of review comparables #1 and #3. These comparables sold proximate in time to the subject's assessment date and are overall more similar to the subject in dwelling size, and most features, but are considerably older homes than the subject. These properties sold in February and May 2021 for prices of \$330,000 and \$515,000 or of \$233.05 and \$245.82 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$260,875 or \$216.67 per square foot of living area, land included, which falls below the two best comparable sales in this record. Based on this evidence and after considering adjustments to the comparables for differences from the subject, the Board finds the appellant failed to prove by a preponderance of the evidence that a reduction in the subject's assessment is justified based on overvaluation.

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:

November 21, 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

Kory Ryan, by attorney:  
Gregory Riggs  
Tax Appeals Lake County  
830 West IL Route 22  
Suite 286  
Lake Zurich, IL 60047

COUNTY

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