



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

APPELLANT: Harmon LLC
DOCKET NO.: 21-01494.001-R-1
PARCEL NO.: 04-20-403-045

The parties of record before the Property Tax Appeal Board are Harmon LLC, 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: \$5,825
IMPR.: \$40,242
TOTAL: \$46,067

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 one-story ranch dwelling of brick exterior construction with 1,872 square feet of living area. The dwelling was constructed in 1966. Features of the home include a basement and a 528 square foot attached garage. The property has a 10,710 square foot site and is located in Zion, Zion Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales that have the same assessment neighborhood code as the subject and are located from .07 to .84 of a mile from the subject property. The comparables have sites that range in size from 8,520 to 14,300 square feet of land area. The comparables are improved with one-story ranch dwellings of wood siding, aluminum siding or brick and aluminum siding exterior construction. The dwellings were built from 1969 to 1992. Each comparable has a basement, two comparables have central air conditioning, one

comparable has a fireplace and two comparables each have a garage with either 288 or 624 square feet of building area. The comparables sold from July 2019 to November 2020 for prices ranging from \$117,000 to \$145,000 or from \$47.33 to \$71.18 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$43,329, which would reflect a market value of \$130,000 or \$69.44 per square foot of living area, including land, when using 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 \$46,067. The subject's assessment reflects a market value of \$138,547 or \$74.01 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 four comparable sales that have the same assessment neighborhood code as the subject and are located from .36 of a mile to 1.12 miles from the subject property. The comparables have sites that range in size from 12,000 to 20,600 square feet of land area. The comparables are improved with one-story ranch dwellings of wood siding, brick or aluminum siding exterior construction ranging in size from 1,533 to 1,834 square feet of living area. The dwellings were built from 1956 to 1973. Each comparable has a basement, three comparables have central air conditioning, two comparables each have a fireplace, three comparables each have an attached garage containing 462 or 525 square feet of building area and two comparables have either a 616 or a 624 square foot detached garage. The comparables sold from January 2019 to October 2020 for prices ranging from \$140,000 to \$187,000 or from \$91.32 to \$119.57 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In response to the appellant's evidence, the board of review submitted a Multiple Listing Service sheet for the appellant's comparable #1 which disclosed the property was sold "as is" and was in need of updates.

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 seven suggested comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables, as well as board of review comparables #2 and #3 due to their sale dates occurring in 2019, less proximate in time to the assessment date at issue than the other comparable sales in the record and thus, less likely to be reflective of the subject's market value as of January 1, 2021 and/or their newer dwelling ages when compared to the subject. Furthermore, the appellant's comparable #3 has no garage, a feature of the subject, board of review comparable #2 is located more than one mile away from the subject and has a

second garage, and board of review comparable #3 has a considerably larger site size when compared to the subject.

The Board finds the best evidence of market value to be board of review comparables #1 and #4, which sold proximate in time to the assessment date at issue and are relatively similar to the subject in location, dwelling size, design, age and some features. However, these two comparables have central air conditioning unlike the subject, suggesting downward adjustments would be required to make them more equivalent to the subject. Nevertheless, the comparables sold in October 2020 for prices of \$175,000 and \$187,000 or for \$95.42 and \$119.57 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$138,547 or \$74.01 per square foot of living area, including land, which falls below the two best comparable sales in the record, which appears to be justified given its lack of central air conditioning. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its assessment is warranted.

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:

July 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Harmon LLC, 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