



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

APPELLANT: Janis Lazda
DOCKET NO.: 21-02769.001-R-1
PARCEL NO.: 16-29-103-005

The parties of record before the Property Tax Appeal Board are Janis Lazda, the appellant, by attorney Christopher G. Walsh, Jr., of Walsh Law, LLC 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: \$88,874
IMPR.: \$79,966
TOTAL: \$168,840

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 wood siding exterior construction with 1,518 square feet of living area. The dwelling was constructed in 1951 and is approximately 70 years old. Features of the home include a basement with approximately 300 square feet of finished area,¹ central air conditioning, a fireplace, and a garage containing 612 square feet of building area. The property has a 21,810 square foot site and is located in Deerfield, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a grid analysis with information on three comparable sales located within the

¹ Although the appellant reports that the subject dwelling has an unfinished basement, the subject's property record card submitted by the board of review depicts 300 square feet of finished area which was not contested by the appellant.

same assessment neighborhood code as the subject property. The comparables have sites ranging in size from 10,560 to 18,000 square feet of land area that are improved with 1-story dwellings of brick or wood siding exterior finishes that range in size from 1,316 to 1,678 square feet of living area. The dwellings were built from 1952 to 1957. Two comparables each feature an unfinished basement. Each comparable also has a fireplace and a garage ranging in size from 210 to 676 square feet of building area. Two comparables each feature central air conditioning. The comparables sold from September to December 2020 for prices ranging from \$290,000 to \$335,000 or from \$191.85 to \$220.36 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's total assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$168,840. The subject's assessment reflects a market value of \$507,789 or \$335.51 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 a grid analysis with information on five comparable sales, four of which are located within the same assessment neighborhood code as the subject property. The comparables have parcels ranging in size from 7,500 to 15,000 square feet of land area. The sites are improved with 1-story dwellings of wood siding or brick exteriors that range in size from 1,036 to 2,272 square feet of living area. The dwellings were built from 1950 to 1958. Four comparables each feature a basement, one with finished area. Four comparables each have central air conditioning; three comparables have one or two fireplaces; and each comparable has an attached or a detached garage ranging in size from 396 to 600 square feet of building area. The comparables sold from April 2020 to August 2021 for prices ranging from \$384,990 to \$640,000 or from \$281.69 to \$376.45 per square foot of living area, including land. The board of review also submitted documentation disclosing that the appellant's comparable sale #1 was essentially a land-only sale as the existing home was demolished and a new house built on the site. The board of review also submitted documentation disclosing that appellant's comparable #2 was not advertised for sale and, therefore, not an arm's-length transaction. Based on this argument and evidence, the board of review requested the 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 eight comparable sales submitted by the parties in support of their respective positions before the Property Tax Appeal Board. After analyzing the evidence submitted, the Board gave less weight to the appellant's comparable #1 based on this being a land-only sale and appellant's comparable #2 based on this sale lacking the essential elements of an arm's-length transaction as it was not advertised for sale. The Board also gave less weight to

board of review comparables #3 and #4 due to their significantly differing dwelling sizes relative to the subject dwelling.

On this record, the Board finds the best evidence of market value to be appellant's comparable #3 and board of review comparables #1, #2, and #5 which are most similar to the subject in dwelling size as well as being overall similar to the subject in location, design, age, and many features. However, each of these comparables has a smaller lot, and all but one comparable have a smaller garage relative to the subject parcel suggesting that upward adjustments are necessary to these comparables in order to make them more equivalent to the subject property. The best overall comparables in the record sold from April 2020 to August 2021 for prices ranging from \$335,000 to \$500,000 or from \$199.64 to \$363.67 per square foot of living area, including land. The subject's assessment reflects a market value of \$507,789 or \$335.51 per square foot of living area, including land, which is within the range established by the best comparable sales in this record on a per square foot basis and appears to be justified given the subject's larger garage and site size. After considering adjustments to the best comparables in the record for differences from the subject, the Board finds that the appellant did not demonstrate by a preponderance of the evidence that the subject property is overvalued and, therefore, a reduction is not 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: December 19, 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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