



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

APPELLANT: Lynette Noble
DOCKET NO.: 21-02771.001-R-1
PARCEL NO.: 16-31-302-008

The parties of record before the Property Tax Appeal Board are Lynette Noble, 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 a reduction 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: \$78,287
IMPR.: \$79,785
TOTAL: \$158,072

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 2,721 square feet of living area. The dwelling was constructed in 1994. Features of the home include an unfinished basement, central air conditioning, a fireplace, and a garage containing 528 square feet of building area. The property has a 10,401 square foot site and is located in Riverwoods, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal.¹ In support of this argument, the appellant submitted a grid analysis with information on three comparable sales located within the

¹ Although the appellant requested an assessment reduction to both land and improvement/dwelling, the record does not contain evidence of land-only sales. Therefore, the Property Tax Appeal Board will analyze and determine the value of the subject property with land and improvement together. See Showplace Theatre Company v. Property Tax Appeal Board, 145 Ill.App 3d. 774 (2nd Dist. 1986).

same assessment neighborhood code as the subject property. The comparables are improved with 1-story and 2-story dwellings of wood siding exterior finishes that contain either 2,708 or 2,721 square feet of living area. The appellant did not disclose the parcel sizes of the comparable properties. The dwellings were built in either 1994 or 1995 and are described as each featuring an unfinished basement, central air conditioning, a fireplace, and a garage containing either 528 or 650 square feet of building area. The comparables sold in March or April 2020 for prices ranging from \$447,500 to \$493,000 or from \$164.46 to \$182.05 per square foot of living area, including land. The appellant's counsel also submitted a brief summarizing the comparables' salient facts and arguing that the "average" sale price per square foot of the comparables supports a reduction to the subject's assessment. Based on this evidence and argument, the appellant requested the subject's total assessment be reduced to \$158,072 which would reflect a market value of \$474,691 or \$174.45 at the statutory assessment rate of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$189,981. The subject's assessment reflects a market value of \$571,371 or \$209.99 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 that includes the three comparables submitted by the appellant. The comparables have parcels ranging in size from 9,247 to 14,033 square feet of land area. The sites are improved with 1-story and 2-story dwellings of wood siding exteriors that range in size from 2,236 to 2,721 square feet of living area. The dwellings were built in either 1994 or 1995. Each comparable features a full unfinished basement, central air conditioning, a fireplace, and an attached garage ranging in size from 468 to 650 square feet of building area. The comparables sold from June 2019 to March 2021 for prices ranging from \$447,500 to \$560,000 or from \$164.46 to \$250.45 per square foot of living area, including land. Based on this 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains a total of five comparable sales including three common comparables 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 board of review comparable #2 which sold in June 2019, a date less proximate in time to the lien date at issue and, thus, less likely to be reflective of subject's market value than the remaining comparables in the record. The Board also gave less weight to appellant's comparables #1 and #3/ board of review comparables #3 and #5, respectively, due to their dissimilar 2-story designs relative to the subject's 1-story home.

The Board finds the best evidence of market value to be board of review comparable sales #1 and #4, which includes a common sale submitted by the parties. These two comparables are most similar to the subject in design, age, and most features. However, board of review comparable #1 is smaller in dwelling size relative to the subject suggesting that upward adjustment is needed to this comparable in order to make it more equivalent to the subject. The two most similar comparables in this record sold in March 2020 and March 2021 for prices of \$530,000 and \$447,500 or for \$226.30 and \$164.46 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$571,371 or \$209.99 per square foot of living area, including land, which is above the two most similar comparable sales in this record in terms of overall value and within range on a per square foot basis. However, given that board of review comparable #1 is smaller in dwelling size, it's logical that its price per square foot would be higher (all other things being equal) based on the principle of economies of scale. Moreover, of the two best comparables in the record, the parties' common comparable (appellant's comparable #2/board of review comparable #4) appears to be most similar to the subject in dwelling size, location, and other features and presented a more recent sale price in March 2021 of \$447,500 or \$164.46, whereas the subject has an assessment reflective of a higher market value of \$571,371 or \$209.99 per square foot of living area, including land. After considering adjustments to the best comparables in the record for differences from the subject, the Board finds that the subject property is overvalued and, therefore, a reduction in the subject's assessment commensurate with the appellant's request 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:

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

AGENCY

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

APPELLANT

Lynette Noble, by attorney:
Christopher G. Walsh, Jr.
Walsh Law, LLC
111 West Washington Street
Suite 1150
Chicago, IL 60602

COUNTY

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