



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

APPELLANT: Marcel Podar
DOCKET NO.: 21-02805.001-R-1
PARCEL NO.: 05-15-304-032

The parties of record before the Property Tax Appeal Board are Marcel Podar, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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: \$4,699
IMPR.: \$62,752
TOTAL: \$67,451

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 dwelling of wood siding exterior construction with 1,298 square feet of living area. The dwelling was constructed in 1945 with an effective age of 1982. Features of the home include a walk-out style basement, an unfinished attic, and a garage containing 1,100 square feet of building area. The property has a 7,500 square foot site and is located in Ingleside, Grant Township, Lake County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on July 2, 2018 for a price of \$84,000. The appellant reported that the seller was Biserak Markovic, the parties to the transaction were not related, and the property was sold by the owner through a realtor with Coldwell Banker Realty. The appellant also indicated the property was advertised for sale through the Multiple Listing Service for a period of 8 days. In further support of the appeal, the

appellants submitted a copy of the Multiple Listing Service sheet, warranty deed, and settlement statement which lists the sale price of \$84,000, a settlement date of July 2, 2018, and depicts commissions being distributed to Coldwell Banker Realty and Equity IL Real Estate. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price plus the application of equalization factors.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$67,451. The subject's assessment reflects a market value of \$202,860 or \$156.29 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 three comparable sales located within .77 of a mile of the subject and within the subject's assessment neighborhood. The comparables consist of one-story dwellings of wood siding exterior construction ranging in size from 1,080 to 2,539 square feet of living area. The dwellings were built from 1975 to 1998, with the oldest home having an effective age of 2002. Each dwelling has central air conditioning, a basement with two having finished area and one being a walk-out style, and a garage ranging in size from 576 to 1,194 square feet of building area. One comparable has a fireplace. The parcels range in size from 10,500 to 49,220 square feet of land area. The comparables sold from April to October 2020 for prices ranging from \$180,000 to \$425,000 or from \$139.28 to \$167.39 per square foot of living area, including land. The board of review also submitted a sales ratio report, photographs, and a memorandum arguing that the subject's purchase was the result of an unqualified "as-is" sale and that the appellant received permits for extensive renovations including new windows, plumbing, electrical, fixtures, and a deck. The board of review also argued that the subject's purchase price should not be carried forward because the subject was not the appellant's primary residence. 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 Board gives little weight to the subject's sale as it is less proximate to the January 1, 2021 valuation date at issue and the record is unrefuted that the subject has been extensively renovated since its July 2018 sale.

The Board finds the best evidence of market value in the record to be the board of review comparable sales #1 and #3, which sold proximate in time to the assessment date at issue and are similar to the subject in location, dwelling size, and some features. The comparables sold for prices of \$180,000 and \$200,000 or for \$139.28 and \$166.67 per square foot of living area, including land. The subject's assessment reflects a market value of \$202,860 or \$156.29 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. While the subject's estimated market value is slightly above the range overall, the Board finds it logical given the subject's additional attic living area, a feature the best comparables lack. The Board gave reduced weight to board of review comparable #2 due to differences in dwelling size and site size when compared to the subject. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds 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

AGENCY

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