



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

APPELLANT: Aidan Quinn  
DOCKET NO.: 21-02910.001-R-1  
PARCEL NO.: 14-24-202-022

The parties of record before the Property Tax Appeal Board are Aidan Quinn, the appellant; 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:** \$35,368  
**IMPR.:** \$0  
**TOTAL:** \$35,368

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 vacant approximately 77,079 square foot parcel<sup>1</sup> and is located in Long Grove, Ela 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 from 0.01 of a mile to 4.60 miles from the subject. The parcels range in size from 43,560 to approximately 85,687 square feet of land area. These comparables sold from November 2020 to August 2021 for prices ranging from \$95,000 to \$122,000 or from \$1.38 to 2.77 per square foot of land area.<sup>2</sup>

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<sup>1</sup> The parties differ slightly regarding the subject's lot size. The Board finds the best evidence of the subject's lot size is found in the subject's property record card presented by the board of review, which was not refuted by the appellant in written rebuttal.

<sup>2</sup> The Board calculated the price per square foot for each comparable based on the reported purchase price divided by the reported site size in square feet.

As part of the appeal, the appellant also disclosed that the appellant purchased the subject property in January 2019 for a price of \$86,754. In support of this transaction the appellant presented copies of a Trustee's Deed, a survey, and a promissory note for \$86,754 payable to the seller, indicating the sale was by contract for deed. The appellant also presented a copy of a listing agreement dated August 7, 2021, pursuant to which the subject would be listed for a price of \$124,900.

The appellant submitted a copy of an Agreed Final Judgment Order filed on January 27, 2021 in Case No. 2020 ED 15 filed with the Circuit Court of the Nineteenth Judicial Circuit, Lake County, Illinois, whereby a portion of the subject property consisting of 0.206 of an acre is conveyed to the Illinois Department of Transportation for highway purposes and a temporary easement over a portion of the subject property consisting of 0.009 of an acre is granted to the Illinois Department of Transportation.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the 2019 purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$49,995. The subject's assessment reflects a market value of \$150,361 or \$1.95 per square foot of land area, 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 comparables where comparable #3 is the same property as the appellant's comparable #4. The comparables are located from 0.41 to 0.83 of a mile from the subject and range in size from 57,427 to 90,947 square feet of land area. Two comparables sold in April and August 2021 for prices of \$185,000 and \$95,000 or for \$3.22 and \$1.39 per square foot of land area, respectively. Two comparables are listed for sale for \$124,900 or for \$1.37 and \$1.49 per square foot of land area.

Based on this evidence, the board of review offered to reduce the subject's assessment to \$41,629, which would reflect a market value of \$124,900, when applying the statutory level of assessment of 33.33%, in order to reflect the August 2021 listing price.

In written rebuttal, the appellant rejected the board of review's offer. The appellant disclosed the subject was now under contract for sale for a price of \$100,000. The appellant submitted a copy of the purchase contract.

### **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 seven comparables, with one common sale, and evidence of a 2019 sale, a 2021 listing, and a 2021 contract for the sale of the subject property, for the Board's consideration. The Board gives less weight to the 2021 listing and 2021 contract for the subject, which are not sales, and less likely to be indicative of market value as of the January 1, 2021 assessment date. The Board gives less weight to the 2019 sale of the subject, which occurred more remote in time from the assessment date and is less likely to be indicative of market value as of the assessment date. The Board also gives less weight to the appellant's comparables #2 and #3, which are located more than two miles from the subject, and to the board of review's comparable #2, which is less similar to the subject in lot size than other comparables in this record. The Board gives less weight to the board of review's comparables #1 and #4, which are listings, not sales, and less likely to be indicative of market value as of the assessment date.

The Board finds the best evidence of market value to be the appellant's comparable #1 and the appellant's comparable #4/board of review's comparable #3, which are more similar to the subject in location and lot size. These two most similar comparables sold in November 2020 and August 2021 for prices of \$118,000 and \$95,000 or for \$1.38 and \$1.39 per square foot of living area, including land. The subject's assessment reflects a market value of \$150,361 or \$1.95 per square foot of living area, including land, which is above the two best comparable sales in this record, and appears to be excessive. Based on this evidence and after considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is 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:

April 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

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COUNTY

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