



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

APPELLANT: Jeffrey Smith
DOCKET NO.: 21-03749.001-R-1
PARCEL NO.: 02-22-204-041

The parties of record before the Property Tax Appeal Board are Jeffrey Smith, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Lake Forest; 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: \$8,356
IMPR.: \$88,258
TOTAL: \$96,614

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 2-story dwelling of vinyl siding exterior construction with 2,928 square feet of living area. The dwelling was constructed in 2018. Features of the home include a basement, central air conditioning, and a 420 square foot garage. The property has a 7,798 square foot site and is located in Antioch, Antioch Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on six comparable sales located within .48 of a mile from the subject. The comparables have sites with 7,800 square feet of land area that are improved with 2-story dwellings of wood siding exterior construction ranging in size from 2,532 to 3,108 square feet of living area. The dwellings were built from 2004 to 2018 and have basements, two of which have finished area. Each comparable has central air conditioning and a garage ranging in size from 420 to 545 square feet of building area. Three comparables each have a fireplace. The

comparables sold from April to October 2020 for prices ranging from \$230,000 to \$291,500 or from \$87.15 to \$96.38 per square foot of living area, including land. Based on this evidence the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$104,094. The subject's assessment reflects a market value of \$313,065 or \$106.92 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.

The board of review submitted a memorandum from the township assessor critiquing the appellant's comparables #1, #2, #4, #5 and #6 noting they are 11 to 14 years older than the subject and located in a different assessment neighborhood than the subject. The assessor noted appellant's comparable sale #1 sold again in October 2021 for \$340,000 or \$116.20 per square foot of living area, including land. To document the sale the assessor submitted Multiple Listing Service (MLS) sheet and the PTAX-203 transfer declaration. The listing disclosed this property looks like a new home with fresh paint, carpet, light fixtures throughout and a recently updated gourmet kitchen that includes new black stainless-steel appliances, counter tops, backsplash, light fixtures, cabinet lightning, generously sized pantry and oversized island.

In support of its contention of the correct assessment the board of review through the township assessor submitted information on five comparable sales located within .62 of a mile from the subject and the same assessment neighborhood as the subject. The comparables have sites ranging in size from 7,798 to 12,754 square feet of land area and are improved with two-story dwellings of wood or vinyl siding exterior construction ranging in size from 2,476 to 2,852 square feet of living area. The comparables were built in 2017 or 2018 and have basements. Each comparable has central air conditioning and a garage ranging in size from 400 to 480 square feet of building area. The properties sold from March 2020 to March 2021 for prices ranging from \$267,500 to \$292,000 or from \$102.38 to \$117.12 per square foot of living area, including land. 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). Based on the evidence in the record, the Board finds the evidence a reduction in the subject's assessment is warranted.

The parties submitted a total of 12 comparable sales for the Board's consideration, one of which sold twice. The Board gives less weight to appellant's comparables #1, #2, #4, #5 and #6 as well as board of review comparables #2, #3, #4, and #5 due to differences in age and/or dwelling size when compared to the subject.

The Board finds the best evidence of market value to be appellant's comparable #3 and board of review comparable #1 which overall are more similar to the subject in location, age, dwelling size and features. These comparables sold in July and September 2020 for prices of \$291,500 and \$292,000 or for \$93.79 and \$102.38 per square foot of living area, including land. The subject's assessment reflects a market value of \$313,065 or \$106.92 per square foot of living area, including land, which falls above the prices of the two best comparable sales in the record. After considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is not supported. Based on this evidence, 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: January 16, 2024



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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