



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

APPELLANT: Adam Boehm
DOCKET NO.: 21-03824.001-R-2
PARCEL NO.: 16-36-203-017

The parties of record before the Property Tax Appeal Board are Adam Boehm, 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 **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: \$143,584
IMPR.: \$475,919
TOTAL: \$619,503

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 stone and wood siding exterior construction with 4,798 square feet of living area.¹ The dwelling was constructed in 2014 and is approximately 6 years old. Features of the home include a basement with finished area, central air conditioning, three fireplaces, a 598 square foot attached garage, and an approximately 518 square foot detached garage. The property has an approximately 22,318 square foot site² and is located in Highland Park, Moraine Township, Lake County.

¹ The parties differ regarding the subject's dwelling size. The Board finds the best evidence of the subject's dwelling size is found in the appellant's appraisal, which contains detailed measurements and calculations of the subject's dwelling size.

² The parties differ regarding the subject's site size. The Board finds the best evidence of site size is found in the subject's property record card, which is corroborated by a plat map found in the appellant's appraisal depicting a site size of 22,500 square feet of land area. The appellant's appraisal states a site size of 21,000 square feet of land area, which does not appear to be supported.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$1,600,000 as of September 2, 2020. The appraisal was prepared by Andrew Norak, a certified residential real estate appraiser, for the purpose of a mortgage refinance transaction, with the intended user identified as the lender.

Under the sales comparison approach, the appraiser selected four comparable sales and one listing located from 0.09 of a mile to 2.24 miles from the subject. The parcels range in size from 12,998 square feet to 1.34 acres of land area and are improved with 2-story homes ranging in size from 3,703 to 5,935 square feet of living area. The dwellings range in age from 6 to 71 years old. The appraiser noted that the two oldest comparables, comparables #1 and #5, have recently been remodeled. Each home has a basement, four of which have finished area, central air conditioning, two or four fireplaces, and a 2-car or a 3-car garage. Four comparables sold in July or August 2020 for prices ranging from \$1,510,000 to \$1,737,500 or from \$267.92 to \$452.34 per square foot of living area, including land, and one comparable is listed for a price of \$1,699,000 or for \$286.27 per square foot of living area, including land. The appraiser made adjustments to the comparables for sale or financing concessions and for differences from the subject, such as site size, view, room count, dwelling size, basement size and finish, garage size, fireplace count, and other improvements, to arrive at adjusted sale prices ranging from \$1,429,200 to \$1,841,400. The appraiser stated most weight was given to comparables #1 and #3, which are closest in distance to the subject or most similar to the subject in age. Based on the foregoing, the appraiser opined a value for the subject of \$1,600,000 as of September 2, 2020.

The appellant also submitted information on four comparables sales located from 3.77 to 3.81 miles from the subject. One comparable has a 69,970 square foot site size. The comparables are improved with 1-story homes ranging in size from 4,079 to 5,233 square feet of living area. The dwellings were built from 1990 to 1995. Each home has a basement, central air conditioning, a fireplace, and a garage ranging in size from 575 to 982 square feet of building area. These comparables sold from June 2020 to May 2021 for prices ranging from \$780,500 to \$1,315,000 or from \$153.61 to \$322.38 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduction in the subject's assessment to \$385,855, which would reflect a market value of \$1,157,681 or \$241.28 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$619,503. The subject's assessment reflects a market value of \$1,863,167 or \$388.32 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 from 0.11 of a mile to 1.53 miles from the subject. The parcels range in size from 18,340 to 37,280 square feet of land area and are improved with 2-story homes of wood siding, stone and stucco, or brick and stone exterior construction. The homes range in size from 5,146 to 5,376 square feet of living area and were built from 1996 to

2008, with the oldest home having an effective age of 2005. Each home has a basement with finished area, central air conditioning, one to five fireplaces, and a garage ranging in size from 576 to 805 square feet of building area. Comparable #3 has an inground swimming pool. The comparables sold from April 2018 to October 2020 for prices ranging from \$2,337,500 to \$2,650,000 or from \$440.12 to \$492.93 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). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant presented an appraisal and four comparable sales and the board of review presented three comparable sales in support of their respective positions before the Board. The Board gives less weight to the value conclusion contained in the appraisal as it was prepared for a mortgage refinance transaction, the lender is the only intended user of the report, and it has a valuation date of September 2, 2020 rather than the January 1, 2021 assessment date. For these reasons, the Board finds the value conclusion to be a less credible and/or reliable opinion of value and the Board will instead consider the raw sales data presented by the parties.

The record contains a total of eleven comparable sales and one listing for the Board's consideration. The Board gives less weight to appraisal comparable #5, which is not a sale and is less likely to be indicative of market value as of the assessment date, and to the board of review's comparables #2 and #3, which sold less proximate in time to the assessment date than the other comparables in this record. The Board also gives less weight to appraisal comparables #2, #3, and #4 and the appellant's comparables, due to substantial differences from the subject in dwelling size and/or their location more than one mile from the subject.

The Board finds the best evidence of market value to be appraisal comparable #1 and the board of review's comparable #1, which are relatively similar to the subject in dwelling size, location, and some features, but these comparables are 2-story homes compared to the subject's 1-story design and have varying degrees of similarity to the subject in age, site size, basement finish, and other features. These two most similar comparables sold for prices of \$1,600,000 and \$2,500,000 or for \$328.14 and \$485.81 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$1,863,167 or \$388.32 per square foot of living area, including land, which is bracketed by the best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from 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:

November 21, 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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