



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

APPELLANT: Nataliya Osadcha
DOCKET NO.: 21-03870.001-R-1
PARCEL NO.: 15-33-212-015

The parties of record before the Property Tax Appeal Board are Nataliya Osadcha, 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: \$24,696
IMPR.: \$119,831
TOTAL: \$144,527

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 wood siding exterior construction with 2,444 square feet of living area. The dwelling was constructed in 1981. Features of the home include a basement with 605 square feet of finished area, central air conditioning, a fireplace, and a 460 square foot garage. The property has a 9,050 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales located within 0.65 of a mile from the subject. The parcels range in size from 6,830 to 14,250 square feet of land area and are improved with 2-story homes of wood siding exterior construction ranging in size from 2,470 to 2,814 square feet of living area. The dwellings were built from 1979 to 1987 and the appellant reported comparable #3 had been recently rehabbed. Each home has a basement with 630 to

1,021 square feet of finished area,¹ central air conditioning, a fireplace, and a 460 or a 462 square foot garage. The comparables sold from August 2020 to May 2021 for prices ranging from \$440,000 to \$479,000 or from \$168.27 to \$193.93 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 \$144,527. The subject's assessment reflects a market value of \$434,668 or \$177.85 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 five comparable sales located within 0.34 of a mile from the subject. The parcels range in size from 6,830 to 9,610 square feet of land area and are improved with 2-story homes of wood siding exterior construction with 2,444 square feet of living area. The dwellings were built from 1978 to 1981. Four homes each have a basement, three of which have 605 or 682 square feet of finished area, and one home has a crawl space foundation. Each home has central air conditioning, a fireplace, and a 460 square foot garage. The comparables sold from May 2020 to July 2021 for prices ranging from \$405,000 to \$500,000 or from \$165.71 to \$204.58 per square foot of living area, including land. These comparables have total assessments ranging from \$139,794 to \$154,867 or from \$57.20 to \$63.37 per square foot of living area, including land.

The board of review submitted a brief contending that the board of review's comparables are all the same model as the subject. Based on this evidence the board of review requested an increase the subject's assessment to \$158,318 or \$64.78 per square foot of living area, including land, which would reflect a market value of \$476,144 or \$194.82 per square foot of living area, including land, 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.

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 no reduction in the subject's assessment is warranted. Furthermore, the Board finds the record does not support the increased assessment sought by the board of review.

The record contains a total of eight comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables and the board of review's comparables #4 and #5, which are less similar to the subject in model, dwelling size, basement finish, size of finished basement area, and/or foundation type than the other comparables in this record.

¹ The appellant presented two grid analysis for the three comparables and reported all three comparables have finished basement area on the second grid analysis.

The Board finds the best evidence of market value to be the board of review's comparables #1, #2, and #3, which are more similar to the subject in dwelling size, age, location, site size, and features. These most similar comparables sold for prices ranging from \$475,000 to \$500,000 or from \$194.35 to \$204.58 per square foot of living area, including land. The subject's assessment reflects a market value of \$434,668 or \$177.85 per square foot of living area, including land, which is below the range established by the best comparable sales in this record. Based on this record, and after considering appropriate adjustments to the best comparables, the Board finds a reduction in the subject's assessment is not justified.

With respect to the board of review's request for an increase in the subject's assessment, the Board finds it would be inequitable to increase the subject's assessment to reflect the sale prices of these most similar comparables, as this would result in a total assessment significantly above the assessments of these comparables. The most similar comparables have total assessments ranging from \$143,359 to \$154,867 or from \$58.66 to \$63.37 per square foot of living area, including land. The subject has a total assessment of \$144,527 or \$59.14 per square foot of living area, including land, which falls within the range established by the best comparables in this record. The board of review's requested increased assessment for the subject of \$158,318 or \$64.78 per square foot of living area, including land, falls above the assessments of the best comparables in this record and is not justified on this record. Therefore, based on equity and the weight of the evidence, the Board finds no increase in the subject's assessment 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:

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

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

APPELLANT

Nataliya Osadcha, by attorney:
Ronald Kingsley
Lake County Real Estate Tax Appeal, LLC
13975 W. Polo Trail Drive
#201
Lake Forest, IL 60045

COUNTY

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