



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

APPELLANT: Raj & Lisa Mehta
DOCKET NO.: 21-04044.001-R-1
PARCEL NO.: 11-28-302-010

The parties of record before the Property Tax Appeal Board are Raj & Lisa Mehta, the appellants, by attorney Timothy C. Jacobs of Kovitz Shifrin Nesbit in Mundelein; 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: \$61,898
IMPR.: \$227,368
TOTAL: \$289,266

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 two-story dwelling of brick and frame exterior construction with 4,059 square feet of living area. The dwelling was constructed in 2017. Features of the home include a walk-out basement, central air conditioning, a fireplace and an 810 square foot garage.¹ The property has an approximately 19,194 square foot site and is located in Vernon Hills, Libertyville Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted information on four comparable sales that have the same assessment neighborhood code as the subject and three of which are located within .29 of a mile from the subject property. The comparables have sites that range in size from approximately 17,222 to

¹ The subject's property record card provided by the board of review depicts the subject dwelling with a walk-out basement, which was unrefuted by the appellants.

24,846 square feet of land area. The comparables are improved with two-story dwellings of brick or brick and frame exterior construction ranging in size from 4,127 to 5,926 square feet of living area. The dwellings were built from 2005 to 2013. Each comparable has a basement, central air conditioning, one to four fireplaces and a garage ranging in size from 731 to 774 square feet of building area. The comparables sold from August 2019 to June 2021 for prices ranging from \$803,000 to \$1,090,000 or from \$183.94 to \$196.04 per square foot of living area, including land. Based on this evidence, the appellants requested the subject's assessment be reduced to \$260,453, which would reflect a market value of \$781,437 or \$192.52 per square foot of living area, including land, when using 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 \$289,266. The subject's assessment reflects a market value of \$869,973 or \$214.33 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 four comparable sales that have the same assessment neighborhood code as the subject and are located within .28 of a mile from the subject property. The board of review's comparables #1 and #2 are the same properties as the appellants' comparables #1 and #2, respectively.² The comparables have sites that range in size from approximately 18,600 to 24,840 square feet of land area. The board of review reported the comparables are improved with one-story³ and two-story dwellings of brick or brick and wood siding exterior construction ranging in size from 3,474 to 5,893 square feet of living area. The dwellings were built from 2004 to 2013. Each comparable has a basement, central air conditioning, two or four fireplaces and a garage ranging in size from 758 to 1,407 square feet of building area. The comparables sold from August 2020 to June 2021 for prices ranging from \$840,000 to \$1,090,000 or from \$184.97 to \$241.80 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 appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains a total of six comparable sales for the Board's consideration, as two sales are common to both parties. The Board has given less weight to the parties' two common comparables which are less similar to the subject in dwelling size than the other comparables in

² The parties differ as to the dwelling size of board of review comparable #2/appellants' comparable #2, where the board of review reported a dwelling size of 5,893 square feet of living area and the appellants reported a dwelling size of 5,926 square feet of living area.

³ The board of review's grid analysis depicts comparable #3 with a ground floor area of 820 square feet and an above ground area of 3,474 square feet, suggesting the dwelling is part two-story.

the record. The Board has also given less weight to the appellant's comparable #4 due to its sale date occurring in 2019, less proximate to the assessment date at issue than the remaining comparables in the record.

The Board finds the best evidence of market value to be the appellants' comparable #3, along with board of review comparables #3 and #4. The Board finds these comparables sold more proximate in time to the assessment date at issue, are similar to the subject in location, and are overall more similar to the subject in dwelling size. However, all three comparables lack a walk-out basement, a feature of the subject; the appellants' comparable #3 and board of review comparable #4 are 10 and 13 years older than the subject dwelling, respectively; and board of review comparable #3 has a considerably larger garage size when compared to the subject, suggesting adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, these three comparables sold from August 2020 to April 2021 for prices ranging from \$803,000 to \$975,000 or from \$194.57 to \$241.80 per square foot of living area, including land. The subject's assessment reflects a market value of \$869,973 or \$214.33 per square foot of living area, including land, which falls within the range established by the best comparable sales in the record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds no reduction 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:

December 19, 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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