



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

APPELLANT: Gregory Marshall
DOCKET NO.: 21-04164.001-R-1
PARCEL NO.: 06-27-208-001

The parties of record before the Property Tax Appeal Board are Gregory Marshall, 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: \$18,102
IMPR.: \$97,014
TOTAL: \$115,116

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 two-story dwelling of vinyl siding exterior construction with 2,750 square feet of living area. The dwelling was constructed in 1993. Features of the home include an unfinished basement, central air conditioning, a fireplace, and a garage containing 440 square feet of building area. The property has a 15,190 square foot site and is located in Grayslake, Avon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal and information on four additional comparable sales. The appellant's appraisal estimated the subject property had a market value of \$355,000 as of May 22, 2020. The appraisal was prepared by Jon Gillespie, a Certified Residential Real Estate Appraiser. The purpose of the appraisal was to determine the market value of the subject for a refinance transaction.

The appraiser developed the sales comparison approach by examining five comparable sales and one listing within .67 miles of the subject, with comparable #5 being the subject's June 2019 sale. The comparables are improved with two-story dwellings ranging in size from 2,596 to 3,144 square feet of living area. The dwellings are reported to be 26 to 226 years old. Each comparable has central air conditioning, a basement with three having finished area, and a two-car garage. The sales occurred from June 2019 to April 2020 for prices ranging from \$337,500 to \$390,000 or from \$107.35 to \$150.23 per square foot of living area, including land. Adjustments were applied for differences between the comparables and the subject property for site size, dwelling size, bathroom count, and other features to arrive at adjusted prices ranging from \$337,200 to \$375,400. Based on this data, the appraiser arrived at a market value of \$355,000 or \$129.09 per square foot of living area, including land, as of May 22, 2020.

The appellant also submitted four additional comparable sales located within .23 of a mile of the subject and within the subject's assessment neighborhood. Comparable #3 is the June 2020 sale of appraisal comparable listing #6. The comparables consist of two-story dwellings ranging in size from 2,378 to 2,693 square feet of living area. The homes were built in 1992 or 1994, with comparable #4 having an effective age of 1997. Each dwelling has central air conditioning, a fireplace, a basement with one having finished area, and a garage ranging in size from 420 to 483 square feet of building area. The parcels range in size from 12,066 to 14,418 square feet of land area. The comparables sold from April to November 2020 for prices ranging from \$209,000 to \$352,500 or from \$82.67 to \$130.89 per square foot of living area, including land. The appellant also submitted Multiple Listing Service sheets for comparables #3 and #4, noting that these properties have been recently renovated.

Based on this evidence, the appellant requested a reduced assessment of \$111,822, for an estimated market value of \$335,500 or \$122.00 per square foot of living area, including land, 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 \$115,116. The subject's assessment reflects a market value of \$346,214 or \$125.90 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 within .23 of a mile of the subject and within the subject's assessment neighborhood. Comparable #3 is the same property as appellant comparable #3/appraisal comparable #6. The comparables consist of two-story dwellings of vinyl siding exterior construction ranging in size from 2,534 to 2,719 square feet of living area. The dwellings were built in 1992 or 1994. Each dwelling has central air conditioning, a fireplace, an unfinished basement, and a garage containing either 462 or 483 square feet of building area. The parcels range in size from 10,020 to 14,370 square feet of land area. The comparables sold from June to September 2020 for prices ranging from \$342,500 to \$369,900 or from \$125.97 to \$145.97 per square foot of living area, including land. The board of review also submitted a Multiple Listing Service sheet associated with the subject's 2019 sale and a memorandum

arguing the appellant's appraisal was the best indicator of value in the record. Based on this evidence, the board of review requested the subject's assessment be increased to \$118,322.

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, nor is the increase requested by the board of review supported.

The parties submitted an appraisal and a total of six additional comparable sales to support their respective positions before the Property Tax Appeal Board, with one comparable being common to the parties. The Board gives less weight to the appellant's appraisal, which relied on two sales occurring in 2019, less proximate in time to the January 1, 2021 valuation date at issue. The Board will instead examine the raw sales contained in the record.

The Board gives less weight to the appraisal comparables #1 through #5, which sold less proximate to the valuation date at issue or differ from the subject in basement finish or dwelling size. The Board gives reduced weight to appraisal comparable #6, which was a listing. The Board also gives diminished weight to appellant comparable #4, which appears to be an outlier due to its much lower sale price compared to the other sales in the record.

The Board finds the best evidence of market value to be the appellant's additional comparable sales #1 through #3, along with the board of review comparable sales, which sold proximate to the valuation date at issue in this appeal and are similar to the subject in age, location, dwelling size, and some features. These most similar comparables sold for prices ranging from \$294,000 to \$369,900 or from \$121.94 to \$145.97 per square foot of living area, including land. The subject's assessment reflects a market value of \$346,214 or \$125.90 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified.

As to the board of review request to increase the subject's assessment, the Board finds the subject's current total assessment of \$115,116 is above the range of the total assessments of the best comparable sales. Although the board of review has requested an increase in the subject's total assessment to \$118,322, the Board finds an increase in the subject's assessment is not 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: 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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