



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

APPELLANT: Peter Vole
DOCKET NO.: 21-04180.001-R-1
PARCEL NO.: 06-36-105-079

The parties of record before the Property Tax Appeal Board are Peter Vole, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Hawthorn Woods; 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: \$8,648
IMPR.: \$56,202
TOTAL: \$64,850

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 townhome of vinyl siding exterior construction with 1,524 square feet of living area. The dwelling was constructed in 1997. Features of the home include a basement with finished area, central air conditioning, one fireplace and a 420 square foot garage. The property has an approximately 2,520 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 information on five comparable sales located within 0.16 of a mile from the subject property. The comparables have sites that range in size from 2,640 to 7,410 square feet of land area and are improved with 2-story townhomes of vinyl siding exterior construction each with 1,524 square feet of living area. The dwellings were built from 1994 to 1997. Each

comparable has a basement with finished area,¹ central air conditioning and a 420 square foot garage. Two comparables each have one fireplace. The properties sold from January 2020 to September 2020 for prices ranging from \$183,000 to \$200,850 or from \$120.08 to \$131.79 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$62,478 which reflects a market value of \$187,453 or \$123.00 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 \$64,850. The subject's assessment reflects a market value of \$195,038 or \$127.98 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 the same five comparable properties submitted by the appellant which were previously described. Board of review comparable #1 is a subsequent sale of the appellant's comparable #3. The properties sold from January 2020 to September 2021 for prices ranging from \$183,000 to \$210,000 or from \$120.08 to \$137.80 per square foot of living area, land included. The board of review's grid analysis also disclosed the subject property sold in July 2021 for a price of \$205,000. In support of the subject's recent sale, the board of review submitted a copy of the subject's property record card which disclosed the subject's July 2021 sale was transferred via warranty deed and recorded as a qualified sale. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 record contains evidence of a recent sale of the subject property and six comparable sales for the Board's consideration, as both parties submitted the same five comparable properties, one of which sold twice. The parties' comparables are identical or nearly identical to the subject in location, age, design, dwelling size and other features. The comparables sold from January 2020 to September 2021 for prices ranging from \$183,000 to \$210,000 or from \$120.08 to \$137.80 per square foot of living area, including land. Furthermore, the board of review submitted evidence the subject property sold in July 2021 for a price of \$205,000 which was not refuted by the appellant. The subject's assessment reflects a market value of \$195,038 or \$127.98 per square foot of living area, including land, which falls within the range established by the comparable sales in this record and below the July 2021 sale price of the subject property.

¹ The Board finds the best description of the appellant's comparables was found in the grid analysis submitted by the board of review which reiterated the appellant's comparable properties.

Therefore, given the recent sale of the subject property and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is justified and a reduction in the subject's assessment is not warranted.

The Illinois Supreme Court has held that a contemporaneous sale between two parties dealing at arm's length is not only relevant to the question of fair cash value but practically conclusive on the issue on whether the assessment is reflective of market value. Korzen v. Belt Railway co. of Chicago, 37 Ill.2d 158 (1967)

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: February 20, 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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