



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

APPELLANT: Ajay Agarwal  
DOCKET NO.: 21-04203.001-R-1  
PARCEL NO.: 07-10-101-026

The parties of record before the Property Tax Appeal Board are Ajay Agarwal, 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:** \$22,100  
**IMPR.:** \$127,253  
**TOTAL:** \$149,353

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 19,358 square foot site improved with a two-story dwelling of wood siding exterior construction containing 3,372 square feet of living area. The dwelling was constructed in 1998. Features of the home include a full basement partially finished with a 1,429 square foot recreation room,<sup>1</sup> central air conditioning, one fireplace and an attached garage with 460 square feet of building area. The property is in Gurnee, Warren 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 improved with two-story dwellings of wood frame construction that range in size from 3,034 to 3,605 square feet of living area. The homes were built in 1999 and 2000. Each comparable has a basement, central air conditioning,

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<sup>1</sup> The board of review submitted a copy of the subject's property record card describing the home as having a full basement with a 1,429 square foot recreation room, which was not refuted by the appellant in rebuttal.

one fireplace, and a garage ranging in size from 620 to 703 square feet of building area. These properties have sites ranging in size from 13,822 to 14,810 square feet of land area. The comparables have the same assessment neighborhood code as the subject property and are located from .12 to .23 of a mile from the subject property. The sales occurred from November 2019 to March 2021 for prices ranging from \$368,000 to \$429,000 or from \$110.23 to \$133.84 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$137,114.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$149,353. The subject's assessment reflects a market value of \$449,182 or \$133.21 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 with comparable sale #3 being the same property as appellant's comparable sale #5. The comparables are improved with two-story dwellings of wood siding exterior construction that have either 3,056 or 3,621 square feet of living area. The homes were built in 1997 and 1999. Each comparable has a basement with finished area,<sup>2</sup> central air conditioning, one fireplace, and an attached garage with either 650 or 672 square feet of building area. Comparable #1 also has an inground swimming pool. These properties have sites ranging in size from 12,240 to 15,960 square feet of land area. The comparables have the same assessment neighborhood code as the subject property and are located from .10 to .23 of a mile from the subject property. The sales occurred from March 2020 to June 2021 for prices ranging from \$409,000 to \$491,100 or from \$133.84 to \$153.80 per square foot of living area, including land.

### **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 Board finds the best evidence of market value to be the appellant's comparable sales #1, #2, #3 and #5 and the board of review comparable sales, which includes a common sale. The comparables are similar to the subject in location, age, design, and style. These properties have similar features as the subject with the exception the appellant's comparables #1, #2 and #3 have unfinished basements whereas the subject has finished basement area, suggesting each of these comparables would require an upward adjustment. Contrarywise, board of review comparable #1 has an inground swimming pool, a feature the subject does not have, and each comparable has a larger garage than the subject, suggesting the comparables would require downward

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<sup>2</sup> The board of review described the common comparable submitted by the parties as having a full basement finished with a 1,143 square foot recreation room, which was not refuted by the appellant in rebuttal.

adjustments to make them more equivalent to the subject for these features. These comparables sold for prices ranging from \$368,000 to \$491,100 or from \$110.23 to \$153.80 per square foot of living area, including land. The subject's assessment reflects a market value of \$449,182 or \$133.21 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and is well supported after considering the suggested adjustments. Less weight is given appellant's comparable sale #4 due to the sale date being not as proximate in time to the assessment date as the best sales in this record. Based on this evidence the Board finds the assessment of the subject property is correct and 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:

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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