



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

APPELLANT: Nikil Patel
DOCKET NO.: 21-04378.001-R-1
PARCEL NO.: 14-22-309-029

The parties of record before the Property Tax Appeal Board are Nikil Patel, 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: \$66,365
IMPR.: \$245,875
TOTAL: \$312,240

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 brick exterior construction with 4,446 square feet of living area. The dwelling was constructed in 2018. Features of the home include a 1,924 square foot look-out basement, central air conditioning, a fireplace and a 953 square foot garage. The property has a 28,640 square foot site and is located in Kildeer, Ela 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, where comparables #2 and #3 are the same property that sold twice. The comparables have the same assessment neighborhood code as the subject and are located within .13 of a mile from the subject property. The comparables have sites with either 23,001 or 23,087 square feet of land area. The comparables are improved with two-story dwellings of brick exterior construction containing 5,013 or 5,017 square feet of

living area that were built in 2003 or 2006. Each comparable has either a 2,387 or a 2,443 square foot basement, central air conditioning, two fireplaces and a garage containing 796 or 890 square feet of building area. The comparables sold from March 2020 to April 2021 for prices ranging from \$750,000 to \$900,000 or from \$149.49 to \$179.53 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$275,624, which would reflect a market value of \$826,955 or \$186.00 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 \$312,240. The subject's assessment reflects a market value of \$939,068 or \$211.21 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 two separate grid analyses with a total of five comparable sales that have the same assessment neighborhood code as the subject and are located within .24 of a mile from the subject property.¹ The board of review's comparable #4 is the same property as the appellant's comparable #2. The Board of review comparables #5 and #7 are duplicates of board of review comparables #1 and #4, respectively.² The comparables have sites that range in size from 21,973 to 23,090 square feet of land area. The comparables are improved with two-story dwellings of brick, frame or brick and wood siding exterior construction ranging in size from 4,108 to 5,213 square feet of living area. The dwellings were built from 2004 to 2018. The comparables each have a basement ranging in size from 2,212 to 3,573 square feet, four of which are walk-outs. Each comparable has central air conditioning, one to three fireplaces and a garage ranging in size from 753 to 890 square feet of building area. The comparables sold from June 2019 to October 2021 for prices ranging from \$850,000 to \$1,050,000 or from \$179.53 to \$206.91 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 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 a total of seven comparable sales for the Board's consideration, as one comparable was common to the parties and where the common comparable sold twice. The Board has given less weight to board of review comparable #1 due to its considerably larger

¹ The Board has renumbered the board of review's second set of three comparables as #5, #6 and #7 for ease of reference.

² The board of review has provided two different dwelling sizes for its comparable identified as PIN #14-22-309-042, board of review comparables #1 and #6. The board of review reported that comparable #1 has 5,213 square feet of living area and comparable #6 has 4,970 square feet of living area.

basement size, when compared to the subject. Additionally, the board of review's evidence contained two differing dwelling sizes for its comparable #1 but did not provide any documentary evidence, such as a property record card, to support either reported dwelling size in order to allow the Board to make a meaningful comparative analysis of this comparable to the subject. The Board has also given less weight to board of review comparable #5 as the sale occurred less proximate in time to the January 1, 2021 assessment date than the other sales in the record.

The Board finds the best evidence of market value to be the parties' remaining comparables, including the common comparable, which sold more proximate in time to the assessment date at issue. The Board finds these comparables are similar to the subject in location and design and are overall more similar to the subject in basement size and some features. However, these five comparables have somewhat larger dwelling sizes and are somewhat older in age when compared to the subject, suggesting adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables sold from March 2020 to October 2021 for prices ranging from \$750,000 to \$1,050,000 or from \$149.49 to \$206.79 per square foot of living area, including land. The subject's assessment reflects a market value of \$939,068 or \$211.21 per square foot of living area, including land, which falls within the range established by the best comparables in the record in terms of overall market value but above the comparables on a price per square foot basis. The subject's higher price per square foot value appears to be justified after considering the economies of scale and adjustments to the comparables for differences in age and other features when compared to the subject. Therefore, based on this record, the Board finds no reduction in the subject's estimated market value as reflected by its 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: October 17, 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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