



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

APPELLANT: Adam Schabes  
DOCKET NO.: 21-04433.001-R-1  
PARCEL NO.: 14-36-401-001

The parties of record before the Property Tax Appeal Board are Adam Schabes, 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:** \$51,412  
**IMPR.:** \$168,148  
**TOTAL:** \$219,560

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 and cedar exterior construction with 3,978 square feet of living area.<sup>1</sup> The dwelling was constructed in 1976 and is approximately 45 years old. Features of the home include a basement with finished area, central air conditioning, two fireplaces and a three-car garage with 928 square feet of building area. The property has a site with approximately 43,514 square feet or .999 of an acre of land area and is located in Long Grove, Ela Township, Lake County.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. In support of this argument, the appellant submitted two comparable

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<sup>1</sup> The Board finds the appellant's appraisal included interior and exterior photographs of the subject dwelling depicting a brick and cedar exterior, as well as finished basement area, which were unrefuted by the board of review.

sales.<sup>2</sup> The evidence revealed that comparable sale #1 is located approximately .62 of a mile from the subject property and comparable sale #2 is located in Vernon Township. The comparables have sites that contain approximately 1.018 or 1.349 acres of land area and are improved with two-story dwellings of frame or brick exterior construction containing 4,426 or 4,629 square feet of living area. Comparable #1 was built in 1963 and comparable #2 is approximately 31 to 40 years old. The MLS listing for comparable #2 disclosed the dwelling was rehabbed in 2015. The comparables each have a basement, one of which has finished area. Each comparable has central air conditioning, two or three fireplaces and either a 624 square foot garage or a three-car garage. The comparables sold in December 2019 and September 2020 for prices of \$535,000 and \$628,000 or for \$115.58 and \$141.89 per square foot of living area, including land, respectively.

In further support of the overvaluation argument, the appellant submitted a refinance appraisal estimating the subject property had a market value of \$661,000 as of March 17, 2021. The appraisal was prepared by R. Steven Kephart, a Certified Residential Real Estate Appraiser. The property rights appraised were fee simple and the purpose of the appraisal was to estimate fair market value for a refinance transaction. The appraiser described the condition of the subject dwelling to be a C3 and indicated the kitchen and bathrooms have been remodeled within the previous five years. The appraiser stated the subject property is well cared for and there was no external or functional depreciation noted. The appraiser indicated the subject dwelling has an effective age of 25 years due to its ongoing repair and maintenance which accounts for the difference between the actual age and the estimated effective age.

In estimating the market value, the appraiser developed the sales comparison approach to value. Under the sales comparison approach to value the appraiser utilized four comparable sales and two active listing that are located within .95 of a mile from the subject property. The comparables have sites that range in size from approximately .90 to 1.42 acres of land area. The comparables are described as two-story dwellings ranging in size from 2,802 to 4,482 square feet of living area and in age from 27 to 52 years old. The comparables each have central air conditioning and either a two-car or a three-car garage. Four comparables each have one to three fireplaces. Comparables #1 through #4 sold from May 2020 to February 2021 for prices ranging from \$611,000 to \$672,000 or from \$145.00 to \$179.40 per square foot of living area, including land. Comparables #5 and #6 are listed for \$625,000 and \$699,000 or for \$196.73 and \$249.46 per square foot of living area, including land, respectively. The appraiser applied adjustments to the comparables for differences when compared to the subject in room count, gross living area and other features to arrive at adjusted sale prices ranging from \$652,200 to \$766,600. Based on the adjusted sale prices and by weighting the four comparable sales based on the percentage of their gross adjustments, the appraiser estimated the subject had a market value of \$661,000 as of March 17, 2021.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$194,903, which would reflect a market value of \$584,767 or \$147.00 per square foot of living area, including land, when using the statutory level of assessment of 33.33%.

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<sup>2</sup> In a memorandum, counsel for the appellant indicated three comparable sales were provided, however, the Board finds the grid analysis presented by the appellant only contains descriptive information on one sale and a Multiple Listing Service (MLS) listing submitted with the appeal petition contained information on a second sale.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject property of \$219,560. The subject's assessment reflects an estimated market value of \$660,331 or \$166.00 per square foot of living area, including land when applying Lake County's 2021 three-year average median level of assessment of 33.25%.

In support of the subject's assessment, the board of review submitted information on five comparables located from .04 to .17 of a mile from the subject property, two of which have the same assessment neighborhood code as the subject. Board of review comparables #1 and #2 were used by the appellant's appraiser and identified as appraisal comparables #1 and #4, respectively. The comparables have sites that range in size from approximately .9390 to 1.4192 acres of land area. The comparables consist of two-story dwellings of brick, wood siding or brick and wood siding exterior construction ranging in size from 3,428 to 3,941 square feet of building area. The dwellings were built from 1969 to 2004, with comparable #1 having a reported effective age of 1972. The comparables each have a basement, one of which is a walk out. Each comparable has central air conditioning, a fireplace and a garage ranging in size from 594 to 748 per square feet of building area. The comparables sold from May 2020 to September 2021 for prices ranging from \$611,000 to \$780,000 or from \$173.63 to \$210.38 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.

The parties' submitted seven comparable sales for the Board's consideration, which includes the two comparables that were also used by the appellant's appraiser. The seven comparables have varying degrees of similarity when compared to the subject and sold from December 2019 to September 2021 for prices ranging from \$535,000 to \$780,000 or from \$115.58 to \$210.38 per square foot of living area, including land. The subject's estimated market value of \$660,331 or \$166.00 per square foot of living area, including land falls within the range established by the comparable sales in the record.

The appraisal submitted by the appellant concluded the subject property had an estimated market value of \$661,000 or \$166.16 per square foot of living area, including land, as of March 17, 2021, which further supports the subject's estimated market value as reflected by its assessment.

Therefore, based on this evidence 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: 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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