



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

APPELLANT: Manucher Khodadad
DOCKET NO.: 21-04680.001-R-1
PARCEL NO.: 16-11-301-062

The parties of record before the Property Tax Appeal Board are Manucher Khodadad, 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: \$39,096
IMPR.: \$422,240
TOTAL: \$461,336

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 1-story condominium of brick exterior construction with 5,688 square feet of living area. The dwelling was constructed in 2002. Features of the condominium include a slab foundation, central air conditioning, a fireplace, 3 full bathrooms and 2 half bathrooms. The property has an approximately 5,690 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales that are located within the same condominium building as the subject. The comparables are improved with 1-story condominium ranging in size from 2,006 to 2,916 square feet of living area. The dwellings were built in 2002. The comparables have central air conditioning, a fireplace, 2 full bathrooms and 1 half bathroom. The comparables sold from July 2020 to April 2021 for prices ranging from \$390,000 to

\$640,000 or from \$194.42 to \$248.30 per square foot of living area, including land. The appellant argued the subject is identical to the comparables, except for the number of bathroom fixtures and land market values. The appellant also included information disclosing the subject was purchased in July 2007 for \$1,445,460.

Based on this evidence the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$461,336. The subject's assessment reflects a market value of \$1,387,477 or \$243.93 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 four comparable sales that are located within the same condominium building as the subject. The board of review's comparable #4 is the same property as the appellant's comparable #1. The comparables are improved with 1-story condominiums of brick exterior construction ranging in size from 2,356 to 5,946 square feet of living area. The dwellings were built in 2002. The comparables have slab foundations, central air conditioning, one or three fireplaces, and bathrooms ranging from 2 full and 1 half bathrooms to 4 full and 1 half bathrooms. The comparables sold from April to October 2021 for prices ranging from \$390,000 to \$1,888,000 or from \$194.42 to \$317.52 per square foot of living area, including land. The board of review argued none of the appellant's comparables have an 8th floor penthouse, like the subject, but the board of review submitted two comparables that have an 8th floor penthouse.

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 parties submitted a total of seven comparable sales for the Board's consideration, one of which was submitted by both parties. The Board gives less weight to the appellant's comparables, which includes the parties' common comparable, due to their lack of an 8th floor penthouse location and their significantly smaller dwelling size when compared to the subject. Likewise, the Board gives less weight to the board of review's comparable #3, due to its lack of an 8th floor penthouse location and its significantly smaller dwelling size when compared to the subject. The Board finds the board of review's remaining comparables have varying degrees of similarity to the subject and also have an 8th floor penthouse location. The best comparables sold in May and October 2021 for prices of \$1,265,000 and \$1,888,000 or \$303.43 and \$317.52 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,387,477 or \$243.93 per square foot of living area, including land, which falls between the

market values of the best comparables in the record on a total market value basis but below the market values on a per square foot basis. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is well supported. The Board gives less weight to the appellant's information disclosing the subject was purchased in July 2007 for \$1,445,460, as the sale occurred greater than 13 years prior to the January 1, 2021 assessment date at issue. Based on this evidence the Board finds a reduction 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: 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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APPELLANT

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