



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

APPELLANT: Mason Sager
DOCKET NO.: 21-04727.001-R-1
PARCEL NO.: 16-23-406-021

The parties of record before the Property Tax Appeal Board are Mason Sager, 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: \$98,224
IMPR.: \$237,389
TOTAL: \$335,613

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 dwelling of “LP siding” and brick exterior construction with 3,068 square feet of living area.¹ The dwelling was constructed in 2018. Features of the home include a basement, that is 100% finished, central air conditioning, a fireplace and an attached 3-car garage. The property has a 12,029 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In partial support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$1,118,000 as of January 24, 2020. The appellant’s appraisal was completed using the cost and the sales comparison approaches in estimating a market value for the subject property.

¹ The Board finds the best evidence of the subject’s features was the appraisal submitted by the appellant.

Under the cost approach, the appellant's appraiser calculated a site value for the subject of \$350,000. The appraiser then calculated the replacement cost-new for the subject's improvements of \$770,100, and subtracted \$20,536 for depreciation, to arrive at a depreciated cost of \$749,564. The appraiser next added \$40,000 for "As-is" value of site improvements to arrive at an indicated value for the subject by the cost approach of \$1,139,600, rounded, as of January 24, 2020.

Under the sales comparison approach, the appellant's appraiser selected five comparable sales and two listings that are located from .16 of a mile to 2.47 miles from the subject. The comparables have sites ranging in size from 9,252 to 24,480 square feet of land area that are improved with "Colonial" style dwellings ranging in size from 2,957 to 3,944 square feet of living area. The comparables range in age from 0 to 15 years old. The comparables have basements, each of which has finished area, central air conditioning, one or three fireplaces, and a 2-car or a 3-car garage. Five of the comparables sold from June to November 2019 for prices ranging from \$1,087,385 to \$1,200,000 or from \$286.15 to \$376.39 per square foot of living area, including land. The listings have asking prices of \$949,000 and \$949,900 or \$261.79 and \$303.19 per square foot of living area, including land. After adjusting the comparables' sale prices, or listing prices, for differences when compared to the subject, the appraiser estimated the comparables would have adjusted sale and listing prices ranging from \$1,044,550 to \$1,189,000. Based on these adjusted prices, the appraiser arrived at an indicated value for the subject by the sales comparison approach of \$1,118,000 as of January 24, 2020.

Under reconciliation, the appellant's appraiser placed primary reliance on the Sales Comparison Approach to arrive at an estimated value for the subject of \$1,118,000.

Alternatively, in support of the overvaluation argument, the appellant submitted a grid analysis containing three comparable sales that are located within .87 of a mile from the subject. The comparables have sites ranging in size from 8,255 to 12,031 square feet of land area that are improved with 2-story dwellings ranging in size from 2,700 to 3,414 square feet of living area. The comparables were built in 2015 or 2018. The comparables have unfinished basements, central air conditioning, a fireplace, and a garage ranging in size from 420 to 484 square feet of building area. The comparables sold in February or December 2019 for prices ranging from \$800,000 to \$942,442 or from \$276.06 to \$296.30 per square foot of living area, including land. These properties have total assessments ranging from \$259,139 to \$315,592 and improvement assessments ranging from \$202,393 to \$251,040 or from \$71.31 to \$74.96 per square foot of living area.

Based on this evidence the appellant requested the subject's assessment be reduced to \$324,656, which reflects a market value of \$974,065 or \$317.49 per square foot of living area, land included, 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 \$335,613. The subject's assessment reflects a market value of \$1,009,362 or \$329.00 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. The subject has an improvement assessment of \$237,389 or \$76.04 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted a grid analysis containing information on five sales that are located from .16 of a mile to 2.44 miles from the subject. The board of review's comparable sales are the same properties as the five comparable sales within the appellant's comparables, however, the board of review reported different dwelling sizes for three of the comparables.

Based on this evidence the board of review requested the subject's assessment be increased to \$372,629, which reflects a market value of \$1,117,999 or \$364.41 per square foot of living area, land included, when using the statutory level of assessment of 33.33%. The comparables have total assessments ranging from \$306,874 to \$424,150 and improvement assessments ranging from \$230,578 to \$321,212 or from \$64.68 to \$92.51 per square foot of living area.

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 a change in the subject's assessment is not warranted.

As an initial matter regarding the market value evidence submitted by the parties, the Board finds all of the comparables in the record have sale dates occurring greater than 12 months prior to the January 1, 2021 assessment date at issue. Nevertheless, the Board finds the best evidence of market value to be the appraisal submitted by the appellant estimating the subject property had a market value of \$1,118,000 as of January 24, 2020, even though its effective date is 11 months prior to the January 1, 2021 assessment date at issue. The appellant's appraiser selected comparable properties that are similar to the subject and made logical adjustments to the comparables to support the appraisal's estimate of the subject's market value. The subject's assessment reflects a market value below the best evidence of market value in the record. Therefore, the Board finds the subject property had a market value of \$1,118,000 as of the assessment date at issue.

The Board gives less weight to the parties' sales grid analyses, even though the board of review submitted the same sales used by the appellant's appraiser, due to their lack of adjustments for differences when compared to the subject.

The Board finds, however, that to increase the subject's assessment to reflect the appraisal value, as requested by the board of review, would result in an inequitable assessment. Therefore, to maintain assessment uniformity, the Board finds no change in the subject's assessment is appropriate.

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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