



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

APPELLANT: Joshua Black
DOCKET NO.: 21-04733.001-R-1
PARCEL NO.: 16-33-205-012

The parties of record before the Property Tax Appeal Board are Joshua Black, 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: \$73,645
IMPR.: \$127,528
TOTAL: \$201,173

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, “Colonial” style dwelling of brick and frame exterior construction with 2,512 square feet of living area.¹ The dwelling was constructed in 1965. Features of the home include a basement, that is 75% finished, central air conditioning, a fireplace and an attached 2-car garage. The property has a 15,246 square foot site and is located in Deerfield, West Deerfield 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 \$607,000 as of January 4, 2021. The appellant’s appraisal was completed using the sales comparison approach in estimating a market value for the subject property. The appellant’s appraiser selected four comparable sales and one listing that are located from .03 of a mile to

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

1.53 miles from the subject. The comparables have sites ranging in size from 8,601 to 18,947 square feet of land area that are improved with "Colonial" style dwellings ranging in size from 2,270 to 2,788 square feet of living area. The comparables range in age from 54 to 58 years old. The comparables have basements, each of which has finished area, central air conditioning, and a 2-car garage. Four of the comparables sold from April to October 2020 for prices ranging from \$550,000 to \$650,000 or from \$226.45 to \$242.10 per square foot of living area, including land. The listing has an asking price of \$675,000 or \$297.36 per square foot of living area, including land. After adjusting the comparables' sale prices, or listing price, for differences when compared to the subject, the appraiser estimated the comparables would have adjusted sale and listing prices ranging from \$594,390 to \$666,315. Based on these adjusted prices, the appraiser arrived at an indicated value for the subject by the sales comparison approach of \$607,000 as of January 4, 2021.

Alternatively, in support of the overvaluation argument, the appellant submitted a grid analysis containing four comparable sales that are located within .27 of a mile from the subject. The appellant's comparables #3 and #4 are the same properties as the appellant's appraisal comparables #4 and #2, respectively. Two of the comparables have sites with 13,499 or 14,505 square feet of land area and two comparables did not have their site sizes disclosed. The comparables are improved with 2-story dwellings ranging in size from 2,058 to 2,931 square feet of living area. The comparables were built in 1960 or 1965. The comparables have basements, two of which have finished area², central air conditioning, a fireplace, and a 462 square foot garage. The comparables sold from May 2020 to April 2021 for prices ranging from \$380,000 to \$650,000 or from \$184.65 to \$242.10 per square foot of living area, including land. These properties have total assessments ranging from \$126,388 to \$218,511 and improvement assessments ranging from \$61,838 to \$146,788 or from \$30.05 to \$50.08 per square foot of living area.

Based on this evidence the appellant requested the subject's assessment be reduced to \$189,218, which reflects a market value of \$567,711 or \$226.00 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 \$201,173. The subject's assessment reflects a market value of \$605,032 or \$240.86 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 \$127,528 or \$50.77 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted Multiple Listing Service (MLS) information for the appellant's comparable #2, which disclosed the property sold above its list price. The board of review also included MLS information disclosing the subject was purchased in April 2015 for \$599,000 or \$238.46 per square foot of living area, including land.

² The appellant's appraisal reported the appellant's sales grid comparables #3 and #4 have finished basement area.

Based on this evidence the board of review requested the subject's assessment be increased to \$202,313, which reflects a market value of \$607,000 or \$241.64 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.

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.

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 \$607,000 as of January 4, 2021. 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.

The Board gives less weight to the appellant's sales grid analysis, due to the lack of adjustments to the comparables 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

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