



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

APPELLANT: Michael Freitas
DOCKET NO.: 21-05066.001-C-1
PARCEL NO.: 06-34-400-031

The parties of record before the Property Tax Appeal Board are Michael Freitas, 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: \$66,196
IMPR.: \$57,428
TOTAL: \$123,624

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 apartment building of brick exterior construction¹ with 3,024 square feet of gross building area. The building was constructed in 1963 and has an effective age of 1975. The subject features a basement with finished area and four 2-bedroom units. The property has a 27,038 square foot site and is located in Grayslake, Avon 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 located in Round Lake Beach or Grayslake. The parcels range in size from 5,401 to 8,523 square feet of land area and are improved with 2-story or 3-story apartment buildings of frame, brick, or brick and vinyl siding exterior construction ranging in size from 3,000 to 6,408 square feet of gross building area. The

¹ Additional details regarding the subject are found in a listing sheet for the subject presented by the board of review.

comparables were built from 1972 to 1987. One building has a crawl space foundation and two buildings each have a concrete slab foundation. Comparable #1 has four 1-bedroom units, comparable #2 has four 2-bedroom units, each having a separate entrance, and comparable #3 has five 2-bedroom units and one 1-bedroom unit. The comparables sold from March to November 2020 for prices ranging from \$250,000 to \$392,116, from \$50.72 to \$103.52 per square foot of gross building area, or from \$54,167 to \$98,029 per unit, including land. 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 \$123,624. The subject's assessment reflects a market value of \$371,802, or \$122.95 per square foot of gross building area, or \$92,951 per unit, 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 five comparable sales located in Lake Zurich, Grayslake, or Round Lake Beach. Comparable #2 is the same property as the appellant's comparable #2. The parcels range in size from approximately 10,890 to 21,344 square feet of land area and are improved with 2-story apartment buildings of frame, brick and vinyl siding, or wood, vinyl, or aluminum siding exterior construction ranging in size from 1,736 to 4,385 square feet of gross building area. The comparables were built from 1870 to 1997 and have from 2 to 5 studio, 1-bedroom, or 2-bedrooms units. Three comparables each have a concrete slab foundation, one comparable has a crawl space foundation, and one comparable has an unfinished basement. Comparables #3 and #4 each have detached garage. The comparables sold from January 2020 to November 2021 for prices ranging from \$218,000 to \$391,116, or from \$70.70 to \$131.05 per square foot of gross building area, or from \$59,600 to \$109,000 per unit, including land.

The board of review submitted a brief contending the subject recently sold and presented a listing sheet disclosing the subject sold in July, 2018 for price of \$345,000 and a copy of an FHA mortgage for the subject in the amount of \$325,600. The board of review argued the appellant's comparable#1 has 1-bedroom units unlike the subject and the appellant's comparable #3 was sold by a lender. 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 eight comparable sales and evidence of a July, 2018 sale of the subject property for the Board's consideration. The Board gives less weight to the July, 2018 sale of the subject as this sale occurred less proximate in time to the assessment date and is less likely to be indicative of market value as of that date. The Board also gives less weight to the

appellant's comparable #3 and the board of review's comparables #3, #4, and #5, which are less similar to the subject in number of units and/or garage amenity.

The Board finds the best evidence of market value to be the appellant's comparable #1, the appellant's comparable #2/board of review's comparable #2, and the board of review's comparable #1, which are similar to the subject in building size, location, number of units, and some features, but have varying degrees of similarity to the subject in age, site size, and mix of units. These most similar comparables sold for prices ranging from \$250,000 to \$392,116 or from \$83.33 to \$131.05 per square foot of living area, or from \$62,500 to \$98,029 per unit, including land. The subject's assessment reflects a market value of \$371,802, or \$122.95 per square foot of gross building area, or \$92,951 per unit, including land, which is within the range established by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not justified.

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:

November 21, 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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