



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

APPELLANT: Leonard Solof
DOCKET NO.: 22-00103.001-R-1
PARCEL NO.: 16-29-419-009

The parties of record before the Property Tax Appeal Board are Leonard Solof, the appellant, by attorney Gregory Riggs, of Tax Appeals Lake County in Lake Zurich; 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: \$39,973
IMPR.: \$101,466
TOTAL: \$141,439

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 2022 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 wood siding exterior construction with 1,728 square feet of living area. The dwelling was constructed in 1948. Features of the home include an unfinished basement, central air conditioning, 2.5 bathrooms, and a 440 square foot detached garage. The property has an approximately 9,110 square foot site and is located in Deerfield, West Deerfield 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 the same assessment neighborhood code as the subject property and within 0.29 of a mile from the subject. The comparables have parcels with either 6,250 or 10,300 square feet of land area. The comparables are improved with 1.75-story or 2-story homes of wood siding or brick and wood siding exterior construction ranging in size from 1,491 to 2,118 square feet of living area. The dwellings were

built from 1900 to 1948 with the oldest home having an effective age of 1942. Each comparable has an unfinished basement, 1.0 or 2.0 bathrooms, and a garage ranging in size from 298 to 744 square feet of building area. One comparable has central air conditioning. One comparable has one fireplace. The comparables sold from December 2020 to February 2022 for prices ranging from \$255,000 to \$348,000 or from \$145.88 to \$233.40 per square foot of living area, land included. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$131,654 which reflects a market value of \$395,002 or \$228.59 per square foot of living area, land included, when applying 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 \$141,439. The subject's assessment reflects a market value of \$424,359 or \$245.58 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.¹

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located in the same assessment neighborhood code as the subject property and within 0.29 of a mile from the subject. Board of review comparable #3 is the same property as the appellant's comparable #2. The comparables have parcels that range in size from 6,250 to 16,820 square feet of land area. The comparables are improved with 1.5-story or 1.75-story homes of wood siding or brick and wood siding exterior construction with either 1,464 or 1,491 square feet of living area. The dwellings were built from 1920 to 1949. Each comparable has an unfinished basement, 1.0 to 2.0 bathrooms, and a garage ranging in size from 318 to 440 square feet of building area. Two comparables have central air conditioning. One comparable has one fireplace. The comparables sold from April 2021 to June 2022 for prices ranging from \$348,000 to \$399,000 or from \$233.40 to \$267.61 per square foot of living area, including land. Based on this evidence, the board of review requested the subject's assessment be sustained.

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 five comparable sales, one of which is shared by the parties, for the Board's consideration. The Board gives less weight to the appellant's comparables #1 and #3 as well as board of review's comparable #2 due to substantial differences from the subject in age or dwelling size.

¹ Property Tax Appeal Board procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for tax year 2022.

The Board finds the best evidence of market value to be the parties two remaining comparables, which includes the common comparable. These comparables sold proximate in time to the subject's assessment date and are similar to the subject in location, age, dwelling size, and features. These comparables sold in April 2021 and May 2021 for prices of \$348,000 and \$399,000 or for \$233.40 to \$267.61 per square foot of living area, land included. The subject's assessment reflects a market value of \$424,359 or \$245.58 per square foot of living area, land included, which falls above the best comparable sales in this record on overall market value basis but is bracketed on a price per square foot basis. However, the subject's higher estimated market value based on its assessment is logical considering its larger lot size, larger dwelling size, additional bathrooms, and larger garage size, when compared to the two best comparables. Based on this record and after considering appropriate adjustments to the two best comparables for differences from the subject, the Board finds a reduction in the subject's estimated market value as reflected by its 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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