



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

APPELLANT: Kerri Bloom
DOCKET NO.: 22-00122.001-R-1 through 22-00122.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Kerri Bloom, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
22-00122.001-R-1	05-09-302-018	2,359	0	\$2,359
22-00122.002-R-1	05-09-302-020	34,016	57,452	\$91,468

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from decisions of the Lake County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessments 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 consisting of two parcels is improved with a one-story dwelling of frame exterior construction with 1,200 square feet of living area. The dwelling was constructed in 1943 and has a reported effective age of 1963. Features of the home include a crawl-space foundation and central air conditioning. The parcels have a combined 14,858 square foot lakefront site which is located in Fox Lake, Grant 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, where comparable #2 is improved with two structures, both a 1.5-story and a 1-story dwelling each of which have wood siding exterior construction and were built in 1950 and 1939, respectively. These homes have a combined 1,702 square feet of living area based upon the underlying property record cards and one home has a fireplace. The four parcels range in size from 5,314 to 23,448 square feet of land

area. Besides comparable #2, the parcels are improved with either a 1.5-story or a 1-story dwelling of wood siding exterior construction and were built in 1938 to 1950, comparable #3 has a reported effective age of 1962. Comparable #1 has a basement with a walkout design. Comparables #3 and #4 each have a fireplace. Comparables #1, #3 and #4 each have a garage or garages ranging in size from 360 to 816 square feet of building area, with comparable #4 having the two largest garages. The properties sold from June 2019 to June 2021 for prices ranging from \$200,000 to \$320,000 or from \$140.65 to \$201.77 per square foot of living area, including land.

Based on this evidence, the appellant requested an assessment reduction.

The board of review submitted two sets of "Board of Review Notes on Appeal" disclosing the combined total assessment for the subject two parcels of \$93,827. The subject's assessment reflects a market value of \$281,509 or \$234.59 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In response to the appeal, the board of review submitted a memorandum prepared by the township assessor noting that appellant's comparables #1 and #2 each have 1.5-story designed dwellings.

In support of its contention of the correct assessment, the board of review through the township assessor submitted information on five comparable lakefront sales of one-story dwellings, where comparables #1, #3 and #4 are the same properties as appellant's comparables #3, #4 and #2, respectively.² The two new comparable properties presented by the board of review consist of comparables #2 and #5 which are each located .03 of a mile from the subject. The parcels consist of 4,413 and 6,795 square feet of land area and are improved with one-story dwellings of frame exterior construction. The homes were built in 1940 and 1943 and contain 1,187 and 945 square feet of living area, respectively. Comparable #5 has central air conditioning, a fireplace and a 400 square foot garage. These two comparables sold in May and July 2022 for prices of \$215,900 and \$418,000 or for \$181.89 and \$442.33 per square foot of living area, including land.

In addition, the township assessor submitted a sales ratio [study] for the subject neighborhood showing the median level of assessment is .3344.³

Furthermore, the assessor submitted a second grid analysis of four comparables consisting of "older" one-story homes "in another Fox Lake Lakefront neighborhood" which are located from 1.2 to 1.52 miles from the subject. The parcels range in size from 4,400 to 9,352 square feet of land area each of which are improved with a one-story dwelling of frame exterior construction. The homes were built between 1930 and 1969 where comparables #1 and #2 have reported effective ages of 1989 and 1970. The dwellings range in size from 836 to 1,162 square feet of

¹ 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.

² The assessor also detailed adjustments to the comparables for differences in lot size and air conditioning which were not otherwise supported on the record and thus have not been analyzed by the Property Tax Appeal Board.

³ A sales ratio study fails to establish a market value for the subject property.

living area. Three of the comparables have basements with finished area, two of which are walkout styles. Each home has central air conditioning and three contain one or two fireplaces. Comparables #2 and #3 each have a garage containing 480 and 546 square feet of building area, respectively, and comparable #2 also has a gazebo. These additional properties sold from June 2020 to June 2022 for prices ranging from \$288,500 to \$425,000 or from \$258.18 to \$508.37 per square foot of living area, including land.

Finally, in the memorandum, the township assessor stated, "Lakefront home prices have been on the rise since 2020." There was no documentary support provided for this assertion.

Based on the foregoing evidence and argument, 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.

As an initial matter, the Board has given no consideration to the neighborhood sales ratio study, the secondary grid analysis of four lakefront homes which are each located more than one mile from the subject property and/or to the generalization that lakefront home prices have been on the rise since 2020.

The Board finds the best evidence of market value on this record to be appellant's comparable sale #3/board of review comparable sale #1, appellant comparable sale #1 and board of review comparables #2 and #5 which are most similar to the subject in location, age, size and several features. The Board has given reduced weight to the remaining sales in the record due to differences in story height, age, dwelling size and/or differences in garage features. The four most similar comparables sold for prices ranging from \$200,000 to \$418,000 or from \$160.45 to \$442.33 per square foot of living area, including land. The subject's assessment reflects a market value of \$281,509 or \$234.59 per square foot of living area, including land, which is well within the range established by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparable sales for differences when compared to 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: March 26, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Kerri Bloom, by attorney:
Gregory Riggs
Tax Appeals Lake County
830 West IL Route 22
Suite 286
Lake Zurich, IL 60047

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085