



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

APPELLANT: Helen Lee
DOCKET NO.: 22-00190.001-R-1
PARCEL NO.: 15-33-301-162

The parties of record before the Property Tax Appeal Board are Helen Lee, 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: \$31,547
IMPR.: \$99,165
TOTAL: \$130,712

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 frame exterior construction with 2,266 square feet of living area. The dwelling was built in 1993. Features of the home include a basement with finished area, central air conditioning, one fireplace, and a garage with 400 square feet of building area.¹ The property has an approximately 3,049 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on five comparable sales located in the subject's assessment neighborhood and within 0.09 of a mile from the subject. The properties have sites with either

¹ Additional property characteristics of the subject, not disclosed by the appellant, were found in the Multiple Listing Service datasheet presented by the board of review which included a fully finished basement with a recreation room, that was unrefuted by the appellant in written rebuttal.

3,049 or 3,484 square feet of land area. The comparables are improved with 2-story dwellings of frame exterior construction with either 2,266 or 2,536 square feet of living area. The homes were built from 1992 to 1994. The comparables each have a basement with one having finished area. Each comparable has central air conditioning, one fireplace, and a garage with either 400 or 448 square feet of building area. The comparables sold from June to November 2020 for prices ranging from \$339,900 to \$389,500 or from \$134.03 to \$169.90 per square foot of living area, land included. The appellant's grid analysis also disclosed that the subject sold in October 2018 for a price of \$390,000 or \$172.11 per square foot of living area, land included. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$117,322 which reflects a market value of \$352,001 or \$155.34 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 \$130,712. The subject's assessment reflects a market value of \$392,175 or \$173.07 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.²

The board of review submitted a copy of the Multiple Listing Service (MLS) datasheet for the subject's sale in October 2018 for a price of \$390,000 or \$172.11 per square foot of living area, land included. The MLS datasheet disclosed the subject was rehabbed in 2010 and had a full finished basement with a second kitchen, features the appellant failed to disclose.

In support of its contention of the correct assessment, the board of review submitted information on five comparable sales located in the same assessment neighborhood code as the subject property and within from 0.16 of a mile from the subject. Board of review comparable #4 is the same property as the appellant's comparable #2. The properties have sites that range in size from 2,613 to 10,248 square feet of land area. The comparables are improved with 2-story dwellings of frame exterior construction ranging in size from 1,932 to 2,536 square feet of living area. The dwellings were built from 1990 to 1995. The comparables each have a basement with two having finished area. Each comparable has central air conditioning, one fireplace, and a garage ranging in size from 400 to 448 square feet of building area. The comparables sold from July 2020 to September 2021 for prices ranging from \$350,000 to \$440,000 or from \$165.62 to \$194.10 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellants contend 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

² 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). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2022.

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 gives little weight to the 2018 sale of the subject property, disclosed by both parties, which occurred over 3 years prior to the subject's January 1, 2022 assessment date at issue and is less likely to be indicative of market value as of that date.

The parties submitted a total of nine comparable sales to support their respective positions, which includes one sale shared by the parties. The Board gives less weight to the appellant's comparables and board of review comparable #4, which includes the common comparable, which have 2020 sale dates occurring less proximate in time to the subject's January 1, 2022 assessment date at issue than other comparables in this record.

The Board finds the best evidence of market value to be the four remaining board of review comparables which sold proximate in time to the subject's assessment date and are similar to the subject in location, design, age, dwelling size, and most features. However, two of these comparables lack basement finish, a feature of the subject, suggesting upward adjustments for this difference would be necessary to make them more equivalent to the subject. These four properties sold from May 2021 to September 2021 for prices ranging from \$350,000 to \$440,000 or from \$165.62 to \$194.10 per square foot of living area, land included. The subject's assessment reflects a market value of \$392,175 or \$173.07 per square foot of living area, land included, which falls within the range established by the best comparable sales in this record. Based on this evidence and after considering the appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant failed to prove by a preponderance of the evidence that a reduction in the subject's assessment is justified based on overvaluation.

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

Helen Lee, 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