



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

APPELLANT: Erwin P. & Jill R. Helberg Revocable Trust
DOCKET NO.: 22-00245.001-R-1
PARCEL NO.: 15-28-310-022

The parties of record before the Property Tax Appeal Board are Erwin P. & Jill R. Helberg Revocable Trust, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. in Chicago; 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: \$36,578
IMPR.: \$123,089
TOTAL: \$159,667

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 2,279 square feet of living area. The dwelling was built in 1985 and is approximately 37 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace, a hot tub, and a garage containing 440 square feet of building area. The property has an approximately 8,710 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 three comparable sales located in the subject's assessment neighborhood. The parcels range in size from 8,760 to 11,720 square feet of land area. The comparables are improved with 2-story dwellings of wood siding exterior construction ranging in size from 2,266 to 2,855 square feet of living area. The homes were built in 1985 with

comparable #3 reported to have an effective age of 1988. The comparables each have a basement with one having finished area. Each comparable has central air conditioning and a garage with either 440 or 483 square feet of building area. Two comparables each have one fireplace. The comparables sold in either June 2020 or March 2021 for prices ranging from \$421,000 to \$541,000 or from \$183.28 to \$206.09 per square foot of living area, land included. Based on this evidence, the appellant requested a reduced assessment of \$146,567, for an estimated market value of \$439,745 or \$192.96 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 \$159,667. The subject's assessment reflects a market value of \$479,049 or \$210.20 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.¹

The board of review noted that the appellant's comparables #1 and #2 sold in 2020.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in the subject's assessment neighborhood. The parcels range in size from 9,900 to 11,940 square feet of land area. The comparables consist of 2-story dwellings of wood siding exterior construction ranging in size from 2,252 to 2,467 square feet of living area. The dwellings were built from 1985 to 1989. The comparables each have a basement with one having finished area. Each comparable has central air conditioning, one or two fireplaces, and a garage ranging in size from 400 to 483 square feet of building area. The comparables sold from August 2021 to September 2022 for prices ranging from \$545,000 to \$575,000 or from \$225.19 to \$242.01 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 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 parties submitted a total of seven comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to the appellant's comparables as well as board of review comparable #4 which differ from the subject in dwelling size, basement finish, and/or 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.

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 board of review comparables' three remaining comparables which sold proximate in time to the subject's assessment date. These comparables are similar to the subject in design, age, dwelling size, and some features. These most similar comparables sold from August 2021 to September 2022 for prices ranging from \$545,000 to \$575,000 or from \$225.19 to \$239.14 per square foot of living area, land included. The subject's assessment reflects a market value of \$479,049 or \$210.20 per square foot of living area, land included, which falls below 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

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