



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

APPELLANT: Jeremy Noe
DOCKET NO.: 22-00376.001-R-1
PARCEL NO.: 07-04-404-003

The parties of record before the Property Tax Appeal Board are Jeremy Noe, the appellant, by attorney Andrew J. Rukavina, of The Tax Appeal Company, in Mundelein, 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: \$43,461
IMPR.: \$215,982
TOTAL: \$259,443

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 two-story dwelling of wood siding exterior construction with 5,225 square feet of living area. The dwelling was constructed in 2002. Features of the home include a full walkout-style basement with finished area, central air conditioning, four fireplaces and a 1,261 square foot garage. The property has an approximately 3.19 acre or 138,780 square foot site and is located in Wadsworth, Warren 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 which are located in the same neighborhood code as is assigned to the subject. The parcels range in size from 88,240 to 201,150 square feet of land area, each of which is improved with either a 1.5-story or a 2-story dwelling of either brick or wood siding exterior construction. The homes were built between 1987 and 1997 and range in size from 4,128 to 5,465 square feet of living area. Each dwelling

has a full basement, one of which is a walkout-style and one of which has finished area. Features include central air conditioning, one to six fireplaces and a garage ranging in size from 793 to 1,248 square feet of building area. Comparable #3 also has an inground swimming pool. The comparables sold from April 2020 to August 2022 for prices ranging from \$405,000 to \$625,000 or from \$85.39 to \$134.90 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduction in the subject's total assessment to \$199,157 which reflects a market value of \$597,531 or \$114.36 per square foot of living area, including land, 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 \$259,443. The subject's assessment reflects a market value of \$778,407 or \$148.98 per square foot of living area, land included, when using 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 four comparable sales, where board of review comparable #4 is the same property as appellant's comparable #5. The comparables are located in the same neighborhood code as is assigned to the subject. The parcels range in size from 200,080 to 248,850 square feet of land area, each of which is improved with either a 1-story,² a 1.5-story or a 2-story dwelling of either brick or wood siding exterior construction. The homes were built between 1988 and 2008 and range in size from 4,722 to 4,790 square feet of living area. Each dwelling has a full basement, two of which have finished area. Features include central air conditioning, one to three fireplaces and a garage ranging in size from 864 to 1,125 square feet of building area. The comparables sold from July 2021 to October 2022 for prices ranging from \$795,000 to \$1,150,000 or from \$167.62 to \$243.54 per square foot of living area, including land.

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.

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

² Although board of review comparable #1 is described as a one-story home, the additional details report a ground floor area of 2,006 square feet with a total above-ground living area of 4,722 square feet, indicating this is a multi-story dwelling.

The parties submitted a total of eight comparable sales, one of which was common to both parties, in support of their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #3 and #4 and board of review comparable #3 due to differences in age and/or pool amenity when compared to the subject property.

The Board finds the best evidence of market value to be appellant's comparable sales #1, #2 and #5/board of review comparable sale #4 and board of review comparables #1 and #2 which are most similar to the subject in location, age, dwelling size and some features. Most notably, the subject is superior to each of these comparables in finished basement area as only board of review comparable #1 has a small, finished basement area and the remaining dwellings have no basement finish suggesting upward adjustments would be necessary for the comparables to make them more equivalent to the subject in market value. On the other hand, the board of review comparables each consist of much larger parcels suggesting downward adjustments for this difference. These five most similar comparables sold for prices ranging from \$405,000 to \$1,150,000 or from \$85.39 to \$243.54 per square foot of living area, including land. The subject's assessment reflects a market value of \$778,407 or \$148.98 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and appears to be well-supported when giving due consideration to the subject's smaller lot, larger finished basement, age and larger overall dwelling size. Based on this evidence, 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

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