



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

APPELLANT: Barbara Pataky  
DOCKET NO.: 22-00385.001-R-1  
PARCEL NO.: 10-22-312-006

The parties of record before the Property Tax Appeal Board are Barbara Pataky, 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:** \$41,716  
**IMPR.:** \$143,072  
**TOTAL:** \$184,788

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 one-story dwelling of vinyl siding and brick exterior construction with 2,787 square feet of living area. The dwelling was constructed in 2008. Features of the home include a walk-out basement with 1,600 square feet of finished area, central air conditioning, a fireplace, and a 628 square foot garage. The property has an approximately 11,650 square foot site and is located in Mundelein, Fremont 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 that have the same assessment neighborhood code as the subject and are located within 0.52 of a mile from the subject property. The parcels range in size from 8,400 to 12,160 square feet of land area. The comparables are improved with one-story dwellings of vinyl siding and brick or vinyl siding and stone exterior construction ranging in size from 2,652 to 3,122 square feet of living area. The dwellings were

built from 2007 to 2013. The comparables each have a basement, two of which have 1,900 or 2,000 square feet of finished area and one of which is a walk-out. Each comparable has central air conditioning and a garage ranging in size from 540 to 642 square feet of building area. Comparables #1 and #3 each have a fireplace. The comparables sold from November 2020 to January 2022 for prices ranging from \$466,500 to \$555,000 or from \$175.90 to \$186.65 per square foot of living area, including land.

The appellant also submitted a grid analysis labeled "Assessor Comps" that included information on five comparable sales. However, the Board finds only two of the comparables in the grid analysis are found in the evidence presented by the board of review.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$165,132, which would reflect a market value of \$495,446 or \$177.77 per square foot of above ground living area, including land, when using 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 \$184,788. The subject's assessment reflects a market value of \$554,419 or \$198.93 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>1</sup>

In a memorandum, the board of review disclosed the subject was purchased in August 2020 for a price of \$535,000 or \$191.96 per square foot of living area, including land. The board of review submitted a Multiple Listing Service datasheet associated with the sale of the subject property. The board of review asserted the subject property received an assessment reduction by the Lake County Board of Review for 2021 and has since only been increased by the 2022 township equalization factor of 1.0363. The board of review made note of the subject property's finished walk-out basement.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales that have the same assessment neighborhood code as the subject and are located within 0.54 of a mile from the subject property. The parcels range in size from 9,710 to 10,540 square feet of land area. The comparables are improved with one-story dwellings of vinyl siding, vinyl siding and brick or vinyl siding and stone exterior construction containing either 2,652 or 3,122 square feet of living area. The dwellings were built in 2007 or 2008. The comparables each have a basement, three of which have 1,307 to 2,290 square feet of finished area and three of which are walk-outs. Each comparable has central air conditioning, a fireplace and a garage ranging in size from 460 to 642 square feet of building area. The comparables sold from February 2021 to May 2022 for prices ranging from \$530,000 to \$660,000 or from \$199.85 to \$211.40 per square foot of living area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

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<sup>1</sup> 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.

**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 ten comparable sales for the Board's consideration, as well as information regarding the sale of the subject property in August 2020. The Board has given less weight to the subject's sale and the appellant's comparable sale #1 due to their sale dates occurring in 2020, less proximate in time to the lien date at issue than the other sales in the record. The Board has also given less weight to the appellant's comparables #3 and #4, along with board of review comparables #1 and #2 due to their larger dwelling sizes, when compared to the subject.

The Board finds the best evidence of market value to be the appellant's comparables #2 and #5, along with board of review comparables #3, #4 and #5, which sold more proximate in time to the January 1, 2022 assessment date and are similar to the subject in location, dwelling size, design and age. However, the Board finds three of the five comparables lack finished basement area and three of the basements are not walk-outs, both features of the subject, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables sold from February 2021 to May 2022 for prices ranging from \$495,000 to \$555,000 or from \$185.28 to \$209.28 per square foot of living area, including land. The subject's assessment reflects a market value of \$554,419 or \$198.93 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. Based on this record and after considering adjustments to the best comparables 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: 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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