



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

APPELLANT: Thomas Rainey
DOCKET NO.: 22-01022.001-R-1
PARCEL NO.: 15-24-205-013

The parties of record before the Property Tax Appeal Board are Thomas Rainey, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC 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: \$72,694
IMPR.: \$135,123
TOTAL: \$207,817

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 brick and frame exterior construction with 3,031 square feet of living area. The dwelling was constructed in 1971, is approximately 51 years old, and an effective age of 1974. Features of the home include a partially finished basement, central air conditioning, two fireplaces and a 621 square foot garage. The property has an approximately 25,265 square foot site and is located in Lincolnshire, 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 same assessment neighborhood code as the subject property and within 0.77 of a mile from the subject. The properties have sites that range in size from 20,038 to 21,344 square feet of land area. The comparables are improved with 2-story dwellings of brick or brick and frame exterior

construction ranging in size from 2,440 to 2,941 square feet of living area. The homes were built from 1967 to 1974 with comparable #3 having an effective age of 1973. Each comparable has either a partially or fully finished basement, central air conditioning, one fireplace, and a garage that ranges in size from 484 to 529 square feet of building area. The comparables sold from June 2020 to August 2021 for prices ranging from \$410,000 to \$559,000 or from \$168.03 to \$195.32 per square foot of living area, land included. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$184,214 which reflects a market value of \$552,697 or \$182.35 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 \$207,817. The subject's assessment reflects a market value of \$623,513 or \$205.71 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in the same assessment neighborhood code as the subject property and within 0.89 of a mile from the subject. The properties have sites that range in size from 20,038 to 25,265 square feet of land area. The comparables are improved with 2-story dwellings of frame or brick and frame exterior construction ranging in size from 3,005 to 3,196 square feet of living area. The homes were built from 1968 to 1980 with comparables #1 and #3 having effective ages of 1975 and 1970, respectively. Each comparable has a partially finished basement, central air conditioning, one or two fireplaces, and a garage that ranges in size from 456 to 785 square feet of building area. Comparable #1 has an inground swimming pool and a gazebo. The comparables sold from May 2021 to August 2022 for prices ranging from \$640,000 to \$805,000 or from \$212.98 to \$262.47 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 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 nine comparable sales to support their respective positions. The Board gives less weight to the appellant's comparables #1, #4, and #5 which are less similar to the subject in dwelling size than other comparables in this record and/or which sold in either 2019 or 2020 and thus are less proximate in time to the subject's January 1, 2022 assessment date at issue than other comparables in this record. The Board also gives less weight to board of review comparable #1 which has an inground swimming pool, not a feature of the subject.

The Board finds the best evidence of market value to be the appellant's comparables #2 and #3 and the board of review comparables #2, #3, and #4 which sold proximate in time to the subject's assessment date and are similar to the subject in location, design, age, dwelling size,

and other features. These five properties sold from April 2021 to May 2022 for prices ranging from \$530,000 to \$805,000 or from \$180.21 to \$262.47 per square foot of living area, land included. The subject's assessment reflects a market value of \$623,513 or \$205.71 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 record and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's estimated market value as reflected by its assessment is not warranted.

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: January 16, 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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