

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:	Alex Ulyanov
DOCKET NO.:	22-01314.001-R-1
PARCEL NO .:	16-16-311-001

The parties of record before the Property Tax Appeal Board are Alex Ulyanov, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Hawthorn Woods; 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:	\$147,718
IMPR.:	\$291,320
TOTAL:	\$439,038

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 5,604 square feet of living area.<sup>1</sup> The dwelling was constructed in 1994. Features of the home include an unfinished basement, central air conditioning, a fireplace, an inground swimming pool, and a garage containing 936 square feet of building area. The property has an 80,150 square foot site and is located in Highland Park, West Deerfield 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 within .42 of a mile of the subject. The comparables consist of two-story dwellings ranging in size from 5,453 to 6,456 square feet of living area. The homes were built from 1989 to 2003. Each dwelling has central

<sup>&</sup>lt;sup>1</sup> Details not reported by the appellant were drawn from the subject's property record card submitted by the board of review.

air conditioning, a fireplace, an unfinished basement, and a garage ranging in size from 984 to 1,144 square feet of building area. Comparable #2 has a parcel containing 39,600 square feet of land area. The comparables sold from December 2020 to May 2022 for prices ranging from \$999,999 to \$1,326,000 or from \$154.89 to \$243.17 per square foot of living area, including land. Based on this evidence, the appellant requested a reduced assessment of \$343,678, for an estimated market value of \$1,031,137 or \$184.00 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 \$439,038. The subject's assessment reflects a market value of 1,317,246 or 235.05 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.<sup>2</sup>

In support of its contention of the correct assessment the board of review submitted information on 11 comparable sales<sup>3</sup> located within 1.3 miles of the subject. The comparables consist of onestory, two-story, or part one-story and part-two story dwellings<sup>4</sup> of wood siding, brick, or wood siding and brick exterior construction ranging in size from 4,612 to 6,514 square feet of living area. The dwellings were built from 1920 to 2008, with comparable #2 having an effective age of 1975. Each dwelling has central air conditioning, one to four fireplaces, and a garage ranging in size from 792 to 1,556 square feet of building area. Nine comparables have basements with six having finished area, two comparables each have a concrete slab foundation, one comparable has an additional detached garage, and two comparables each have an inground swimming pool. Ten comparables have parcels ranging in size from 19,310 to 250,580 square feet of land area. The comparables sold from January to October 2021 for prices ranging from \$1,300,000 to \$2,150,000 or from \$213.71 to \$330.06 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.

The parties submitted a total of 14 comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to the appellant's comparable #1,

 $<sup>^2</sup>$  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 III. Admin. Code 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.

<sup>&</sup>lt;sup>3</sup> The comparables were presented on three separate grids; for ease of reference the comparables have been renumbered #1 through #11.

<sup>&</sup>lt;sup>4</sup> Although the board of review's grid describes comparable #5 as a one-story dwelling, the grid reports a 3,028 square foot ground floor and 6,083 square feet of above ground living area, indicating that this property is a part two-story dwelling.

which sold less proximate to the January 1, 2022 valuation date at issue. The board also gives reduced weight to the board of review comparables, which differ from the subject in age, location, design, dwelling size, basement finish, and/or foundation.

The Board finds the best evidence of market value to be appellant's comparable sales #2 and #3, which sold proximate to the valuation date at issue and are similar to the subject in age, location, dwelling size, and some features. These most similar comparables sold in January 2021 and May 2022 for prices of \$1,000,000 and \$1,300,000 or for \$170.30 and \$243.17 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,317,246 or \$235.05 per square foot of living area, including land, which is bracketed by the best comparable sales in this record on a per-square-foot basis. While the subject's estimated market value is above the best comparables overall, the Board finds it logical given the subject's inground swimming pool, a feature the best comparables lack. Based on this evidence 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.



# 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 <u>PETITION AND</u> <u>EVIDENCE</u> 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

Alex Ulyanov, by attorney: Ronald Kingsley Lake County Real Estate Tax Appeal, LLC 40 Landover Parkway Suite 2 Hawthorn Woods, IL 60047

## COUNTY

Lake County Board of Review Lake County Courthouse 18 North County Street, 7th Floor Waukegan, IL 60085