



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

APPELLANT: Evan Goodman
DOCKET NO.: 22-01328.001-R-1
PARCEL NO.: 15-25-402-017

The parties of record before the Property Tax Appeal Board are Evan Goodman, 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: \$79,140
IMPR.: \$218,188
TOTAL: \$297,328

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 is improved with a two-story dwelling of brick and frame exterior construction with 5,140 square feet of living area. The dwelling was built in 1980. Features of the home include an unfinished basement, central air conditioning, 2 fireplaces, 3 bathrooms, and an attached garage with 638 square feet of building area. The property has a 43,104 square foot site in Riverwoods, 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 improved with two-story dwellings of frame or brick and frame construction that range in size from 4,275 to 4,456 square feet of living area. The homes were built from 1979 to 1987 with the newest home having an effective construction date of 1993. Each comparable has a basement with two having finished area, central air conditioning, 1 to 3 fireplaces and an attached garage ranging in size from 910 to

1,300 square feet of building area. The comparables have 2, 4 or 6 full bathrooms. Comparable #1 has 2 half-bathrooms and comparable #2 has 1 half-bathroom. Comparables #2 and #3 have inground swimming pools with 681 and 600 square feet, respectively. Comparable #3 also has a bath house and a shed. These properties have sites ranging in size from 57,994 to 81,149 square feet of land area. The comparables have the same assessment neighborhood code as the subject and are located from .58 to .92 of a mile from the subject property. The sales occurred from January 2021 to April 2022 for prices ranging from \$553,000 to \$855,000 or from \$124.10 to \$196.82 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$284,385.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$297,328. The subject's assessment reflects a market value of \$892,073 or \$173.56 per square foot of living area, land included, when using the statutory level of assessment for of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on eight comparable sales improved with one-story dwelling and two-story dwellings of frame or brick and frame construction that range in size from 4,781 to 5,482 square feet of living area.² The homes were built from 1953 to 2011. Seven of the comparables have basements with finished area. Each comparable has central air conditioning, one to four fireplaces, and one or two attached garages with from 552 to 2,263 square feet of building area. The comparables have from 3 to 6 full bathrooms and seven of the comparables have an additional 1 or 2 half-bathrooms. These properties have sites ranging in size from 22,651 to 103,899 square feet of land area. The comparables have the same assessment neighborhood code as the subject and are located from .4 to 1.26 miles from the subject property. The sales occurred from May 2020 to June 2022 for prices ranging from \$826,000 to \$1,365,000 or from \$171.53 to \$256.92 per square foot of living area, including land.

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 eleven comparables submitted by the parties to support their respective position all with varying degrees of similarity to the subject property. Considering the

¹ Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2022.

² The board of review provided two grid analyses listing nine comparables that were numbered #1 through #5 and numbered #1 through #4. For clarity purposes the Property Tax Appeal Board has renumbered the second set of four comparables as #6 through #9. The Board further finds that board of review comparables #2 and #6 are duplicates.

appellant's comparables, the Board finds less weight is to be given appellant's comparable #1 as the price of this property is an outlier, significantly below the prices of the other comparables submitted by the parties. The Board finds that appellant's comparables #2 and #3 are improved with homes similar to the subject in age but were approximately 17% and 15% smaller than the subject dwelling, respectively, indicating each would require an upward adjustment for dwelling size to make them more equivalent to the subject property. Appellant's comparables #2 and #3 have larger garages than the subject and each has an inground swimming pool, a feature the subject does not have, implying these comparables would need downward adjustments to make them more equivalent to the subject for these characteristics. Additionally, appellant's comparable #3 has finished basement area while the subject has an unfinished basement which would suggest this comparable would require a downward adjustment for this amenity. These two comparables sold for prices of \$815,000 and \$855,000 or for \$190.64 and \$196.82 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$892,073 or \$173.56 per square foot of living area, land included, which is above the overall price of the two best comparables presented by the appellant but below the price on a per square foot of living area basis. The Board finds the subject's overall higher value is justified based on its larger dwelling size and the price per square foot seems appropriate given the adjustments to the appellant's best comparable sales. The Board finds these sales are supportive of the subject's assessment.

With respect to the comparable sales submitted by the board of review, the Board gives little weight to board of review comparable sale #2 as this property has a significantly larger site than the subject; the dwelling has a chronological age that is 23 years older than the subject and an effective age that is 15 year older than the subject; has a significantly larger garage than the subject; and has no basement while the subject has a basement. Little weight can be given board of review comparable #9 as this property differs from the subject in style, being a one-story dwelling. The Board finds that board of review comparable #7 is similar to the subject in most respects, including age, with the exception this property has a finished basement and a larger garage than the subject. The sale price of this comparable of \$1,080,000 or \$203.74 per square foot of living area, including land, is supportive of the subject's assessment, however, the sale occurred in May 2020, 19 months prior to the lien date, which detracts from the weight that can be given this sale. Board of review comparable #8 is 27 years older than the subject dwelling and is smaller than the subject dwelling suggesting an upward adjustment for age and size would be appropriate. Nevertheless, this property sold for \$826,000 or \$172.77 per square foot of living area, including land, which is supportive of the subject's assessment given the suggested adjustments. Board of review comparables #1, #3, #4 and #5 are from 19 to 31 years newer than the subject dwelling, each as a finished basement whereas the subject has an unfinished basement, and each has a larger garage than the subject, indicating each comparable would require negative or downward adjustments to make them more equivalent to the subject for these attributes. These four comparables sold for prices ranging from \$1,080,000 to \$1,365,000 or from \$200.66 to \$256.92 per square foot of living area, including land. The subject's assessment reflecting a market value of \$892,073 or \$173.56 per square foot of living area, including land, is below the range of these four comparables but appropriate given the suggested adjustments to these superior properties.

In conclusion, after analyzing the sales presented by the parties, the Board finds the assessment of the subject property is correct and 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: 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

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