



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

APPELLANT: Steven DeAngeles
DOCKET NO.: 22-01466.001-R-1
PARCEL NO.: 15-24-304-028

The parties of record before the Property Tax Appeal Board are Steven DeAngeles, 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: \$74,618
IMPR.: \$408,230
TOTAL: \$482,848

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 brick exterior construction with 7,624 square feet of living area. The dwelling was constructed in 2007. Features of the home include a basement with finished area, central air conditioning, three fireplaces, a 1,058 square foot attached garage, and a 768 square foot detached garage. The property has a 42,253 square foot site and is located 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 four comparable sales improved with two-story dwellings of brick or frame construction ranging in size from 6,223 to 7,917 square feet of living area. The homes were built between 1996 and 2005. Each comparable has central air conditioning, three to six fireplaces, a basement with three having finished area, and an attached garage ranging in size from 1,053 to 1,410 square feet of building area. Comparable #1 also has a 517 square foot

detached garage and a tennis court. Comparables #2 and #3 each have an inground swimming pool. These properties have sites ranging in size from 37,897 to 109,092 square feet of land area. Each property has the same assessment neighborhood code as the subject property, and are located from 0.28 of a mile to 2.02 miles from the subject property. The sales occurred from January 2020 to June 2021 for prices ranging from \$825,000 to \$1,340,000 or from \$104.21 to \$215.33 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$406,573.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$482,848. The subject's assessment reflects a market value of \$1,448,689 or \$190.02 per square foot of living area, land included, when applying 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, with the board of review's comparables #1 and #4 being identical to the appellant's comparables #4 and #3. The board of review's comparable sales are improved with two-story dwellings of frame or brick exterior construction that range in size from 6,223 to 7,723 square feet of living area that were built from 1969 to 2004.² Each comparable has central air conditioning, two to four fireplaces, and a garage ranging in size from 1,053 to 1,410 square feet of building area. Three of the properties have a basement with two having finished area. Comparable #3 and #4 each have an inground swimming pool. These comparables have sites ranging in size from 37,897 to 87,552 square feet of land area. Each property has the same assessment neighborhood code as the subject and are located from 0.28 of a mile to 1.75 miles from the subject property. The sales occurred from July 2020 to June 2021 for prices ranging from \$1,300,000 to \$1,400,000 or from \$181.28 to \$215.33 per square foot of living area, including land.

The board of review noted the subject property's assessment was reduced by the board of review for tax years 2019 and 2021 and the appellant's comparable #1 was a bank sale that was originally listed in 2018. Based on this evidence, the board of review requested confirmation of the subject property'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 Section 1910.50(c)(1) of the Board's procedural rules 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. Adm. 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.

² The board of review's comparable #3, which was constructed in 1969, is listed as having an effective age of 1983.

The record contains a total six comparable sales, with two common sales, for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2 and #3 and the board of review's comparables #3 and #4 which either sold less proximate in time to the assessment date than the other comparables in this record or have significant differences in age and/or features when compared to the subject dwelling. The Board finds the best evidence of market value to be the board of review's comparable #1, which is also the appellant's comparable #4, along with the board of review's comparable #2. These comparables are relatively similar to the subject in size, age, location, and type of construction, although the properties have varying degrees of similarity to the subject in terms of features, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. These most similar comparables sold in May and June 2021 for \$1,310,000 and \$1,340,000 or \$185.66 and \$215.33 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,448,689 or \$190.02 per square foot of living area, including land, which is bracketed by the best comparable sales on a per square foot basis. Although the subject is above the best comparables in terms of overall value, this appears logical given the subject's larger dwelling size and two garages. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from 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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