



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

APPELLANT: Robert Moorman
DOCKET NO.: 22-01479.001-R-1
PARCEL NO.: 16-05-202-001

The parties of record before the Property Tax Appeal Board are Robert Moorman, 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: \$111,673
IMPR.: \$78,810
TOTAL: \$190,483

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 1-story dwelling of wood siding exterior construction with 2,124 square feet of living area. The dwelling was constructed in 1958. Features of the home include a concrete slab foundation, central air conditioning, two fireplaces and an 800 square foot garage. The property has a 37,030 square foot site and is located in Lake Forest, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of the overvaluation argument, the appellant submitted information on three comparable sales located from 0.91 of a mile to 2.20 miles from the subject property. The comparables have sites that range in size from 20,931 to 60,548 square feet of land area and are improved with one-story dwellings ranging in size from 1,924 to 2,533 square feet of living area. The dwellings were built from 1943 to 1955.

Each comparable has central air conditioning and a garage ranging in size from 456 to 1,440 square feet of building area. Two homes each have one fireplace. The properties sold from May 2021 to June 2022 for prices of \$500,000 and \$725,000 or from \$197.39 to \$376.82 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$120,348 which reflects a market value of \$361,080 or \$170.00 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 \$190,483. The subject's assessment reflects a market value of \$571,506 or \$269.07 per square foot of living area, land included when using 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 ten comparable sales in two grids.² The comparables are located from 0.73 of a mile to 1.79 miles from the subject property. Board of review comparable #7 is the same property as the appellant's comparable #3. The comparables have sites that range in size from 9,510 to 89,300 square feet of land area and are improved with 1-story or 1.5-story dwellings of brick, wood siding or brick and wood siding exterior construction ranging in size from 1,705 to 2,542 square feet of living area. The homes were built from 1955 to 1972, with comparable #5 having an effective age of 1981. Six comparables have a basement, with one having finished area and four comparables have either a slab or crawl space foundation. Each dwelling has central air conditioning, one or two fireplaces and a garage ranging in size from 400 to 624 square feet of building area. The properties sold from February 2020 to June 2022 for prices ranging from \$614,308 to \$805,000 or from \$281.67 to \$469.21 per square foot of living area, land included.

The board of review submitted a copy of the subject's 2020 favorable PTAB decision under Docket Number 20-05473.001-R-1, lowering the subject's assessment to \$184,038 based on an agreement between the parties and a table containing equalization factors for each township in Lake County for tax years 2015 through 2022. The Board finds the subject property, for tax year 2022, is not an owner-occupied residence according to its property record card which disclosed the subject did not receive a general homestead exemption. Furthermore, the appellant's address, as reported in the property record card, differs from the address of the subject property.

Based on this evidence, the board of review requested the subject's assessment be confirmed.

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

¹ 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.

² The comparables on page two of the board of review's grid analysis have been renumbered #6 through #10.

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.

As an initial matter, the Board finds the subject property is not owner-occupied and therefore Section 16-185 of the Property Tax Code is not applicable in this appeal.

The record contains 12 comparable sales for the Board's consideration, as one property was common to both parties. The Board gives less weight to appellant comparable #1 which differs in age when compared to the subject. The Board gives less weight to board of review comparables #1 through #5, #8, #9 and #10 which differ from the subject in foundation type and/or sold in 2020, less proximate to the January 1, 2022 assessment date than other properties in the record.

The Board finds the best evidence of market value to be appellant comparables #2 and #3 along with board of review comparables #6 and #7, including the common property, which sold proximate to the assessment date at issue in this appeal and are more similar to the subject in age, dwelling size, foundation type and other features. However, two of these best comparables have larger site sizes when compared to the subject's site size, suggesting a downward adjustment is needed to make these properties more equivalent to the subject. These comparables sold from December 2021 to June 2022 for prices ranging from \$500,000 to \$805,000 or from \$249.13 to \$376.82 per square foot of living area, including land. The subject's assessment reflects a market value of \$571,506 or \$269.07 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. After considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is justified and a reduction in the subject's 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: March 26, 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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