



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

APPELLANT: Matthew Gopin
DOCKET NO.: 22-01495.001-R-2
PARCEL NO.: 16-20-101-031

The parties of record before the Property Tax Appeal Board are Matthew Gopin, 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: \$161,588
IMPR.: \$604,343
TOTAL: \$765,931

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 wood siding exterior construction with 7,150 square feet of living area. The dwelling was constructed in 2016. Features of the home include a basement, central air conditioning, three fireplaces and an 800 square foot garage. The property has an approximately 99,317 square foot site and is located in Bannockburn, 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 that are located from .64 of a mile to 2.18 miles from the subject property. The parcels range in size from 23,126 to 44,248 square feet of land area and are improved with 2-story dwellings ranging in size from 6,011 to 6,192 square feet of living area. The dwellings were built from 1959 to 2001 with comparable #3, the oldest comparable, having are reported effective age of 1984. Each comparable has a basement,

central air conditioning, a fireplace and a garage ranging in size from 650 to 806 square feet of building area. The comparables sold from September 2020 to March 2022 for prices ranging from \$840,000 to \$1,130,000 or from \$138.29 to \$187.99 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$607,689, which would reflect a market value of \$1,823,249 or \$255.00 per square foot of above ground living area, including land, when using 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 \$765,931. The subject's assessment reflects a market value of \$2,298,023 or \$321.40 per square foot of above ground 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 five comparable sales that are located within .96 of a mile from the subject. The parcels range in size from 50,970 to 152,020 square feet of land area and are improved with 1-story, 1.5-story, 1.75-story, or 2-story homes ranging in size from 5,498 to 7,688 square feet of living area. The dwellings were built from 1978 to 2015. The comparables each have a basement, one of which has finished area. Each comparable has central air conditioning, one to three fireplaces, and one or two garages ranging in size from 800 to 1,508 square feet of building area. Two comparables each have an inground swimming pool. The comparables sold from October 2020 to June 2022 for prices ranging from \$1,650,000 to \$3,550,000 or from \$296.44 to \$475.11 per square foot of living area, including land.

The board of review also submitted a Multiple Listing Service datasheet for the subject, which disclosed the subject property was purchased as new construction in August 2015 for \$2,569,900.

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

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

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.

The record contains a total of eight comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables, as well as board of review comparables #2, #3 and #4 due to differences from the subject in dwelling size and/or age. Moreover, the appellant's comparable #1 and board of review comparable #3 sold in 2020, less proximate in time to the assessment date than other comparables in this record and the appellant's comparables #1 and #3 are located more than one mile away from the subject.

The Board finds the best evidence of market value to be board of review's comparables #1 and #5, which sold more proximate in time to the assessment date and are similar to the subject in location and dwelling size but have varying degrees of similarity to the subject in site size, design, age and features. Nevertheless, these two comparables sold in February and April 2021 for prices of \$2,250,000 to \$3,550,000 or from \$316.63 to \$475.11 per square foot of living area, including land. The subject's assessment reflects a market value of \$2,298,023 or \$321.40 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record. Based on this record 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.



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

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