



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

APPELLANT: William Napier
DOCKET NO.: 22-01775.001-R-1
PARCEL NO.: 05-24-310-027

The parties of record before the Property Tax Appeal Board are William Napier, 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 **A Reduction** 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: \$7,946
IMPR.: \$77,824
TOTAL: \$85,770

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 built in 1999. The property has a 6,970 square foot site and is located in Round Lake, Grant Township, Lake County.

The appellant contends assessment inequity with respect to the land as the basis of the appeal. In support of this argument the appellant submitted information on seven equity comparables located within .26 of a mile of the subject and within the subject's assessment neighborhood. The comparables are improved with two-story dwellings built in 1999 or 2004. The comparables have sites ranging in size from 6,098 to 7,841 square feet of land area. The comparables have land assessments ranging from \$6,948 to \$8,934 or \$1.14 per square foot of land area. Based on this evidence, the appellant requested the subject's land assessment be reduced to \$7,946 or \$1.14 per square foot of land area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$88,613. The subject property has a land assessment of \$10,789 or \$1.55 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on five equity comparables located within .23 of a mile of the subject and within the subject's assessment neighborhood. The comparables are improved with two-story dwellings built in 1998 or 1999. The comparables have sites ranging in size from 4,792 to 5,663 square feet of land area. The comparables have land assessments ranging from \$8,309 to \$9,301 or from \$1.64 to \$1.73 per square foot of land area. The board of review also submitted a uniformity report for the subject's neighborhood, an aerial photograph, and a memorandum noting that properties with a land assessment per square foot ranging from \$1.55 to \$1.73 have a \$7,500 land adjustment for being adjacent to homeowner's association property. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of 12 equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the board of review's comparables, which differ from the subject in site size.

The Board finds the best evidence of assessment equity to be the appellant's comparables, which are similar to the subject in site size. These comparables have land assessments that range from \$6,948 to \$8,934 or \$1.14 per square foot of land area. The subject's land assessment of \$10,789 or \$1.55 per square foot of living area falls above the range established by the best comparables in this record and appears to be excessive. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment commensurate with the appellant's request is 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: 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

AGENCY

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