



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

APPELLANT: Sam Thomas
DOCKET NO.: 22-01897.001-R-1
PARCEL NO.: 11-11-101-020

The parties of record before the Property Tax Appeal Board are Sam Thomas, 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: \$79,118
IMPR.: \$202,249
TOTAL: \$281,367

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 brick exterior construction with 4,002 square feet of living area. The dwelling was constructed in 1999. Features of the home include an unfinished basement, central air conditioning, a fireplace and a 655 square foot garage. The property has a 42,642 square foot site and is located in Green Oaks, Libertyville 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 located in a different assessment neighborhood code as the subject and within .95 of a mile from the subject property. The comparables have sites that range in size from 21,536 to 41,507 square feet of land area. The comparables are improved with 2-story dwellings of brick and frame exterior construction that range in size from 3,373 to 4,812 square feet of living area that that were built from 1995 to 1999, with comparable #3 having an effective age of 2003. The appellant reported that each

comparable has a basement, one with finished area and one of walk-out design.¹ Each comparable has central air conditioning, one to three fireplaces and a garage ranging in size from 720 to 957 square feet of building area. The comparables sold from June 2021 to March 2022 for prices of \$769,000 or \$840,000 or ranging from \$174.56 to \$227.99 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$281,367. The subject's assessment reflects a market value of \$844,185 or \$210.94 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.²

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales. Comparables #2 and #3 are the same comparables as the appellant's comparables #2 and #3, respectively. The comparables are located within .95 of a mile from the subject property with one comparable being located in the same assessment neighborhood code as the subject. The comparables have sites that range from 21,536 to 41,507 square feet of land area. The comparables are improved with 2-story dwellings of brick and frame exterior construction ranging from 3,373 to 4,771 square feet of living area that were built from 1995 to 2005, with comparable #3 having an effective age of 2003. Each comparable has a basement, one with finished area, central air conditioning, one to three fireplaces, and a garage ranging in size from 720 to 1,265 square feet of building area. The comparable sold from October 2020 to August 2021 for prices ranging from \$769,000 and \$1,200,000 or from \$214.29 to \$251.52 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject'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.

The parties submitted a total of four comparable sales for the Board's consideration, with two comparables being common to both parties. The Board has given less weight to appellant's comparable #3/board of review comparable #3 as it has a finished basement, unlike the subject. The Board has also given less weight to board of review's comparable #1 which sold less proximate in time to the assessment date than the other comparables in this record.

¹ The appellant submitted MLS data sheet for comparable #3 disclosing the dwelling has a basement with finished area and was rehabbed in 2018.

² 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 Board finds the parties two remaining comparables, which includes one common comparable sold more proximate in time to the assessment date at issue and each has an unfinished basement, like the subject. However, these two comparables have varying degrees of similarity to the subject in site size, dwelling size, age and some features suggesting adjustments would be required for these differences to make the comparables more equivalent to the subject. Nevertheless, the comparables sold in August 2021 and March 2022 for prices of \$840,000 or for \$174.56 to \$214.29 per square foot of living area, including land. The subject's assessment reflects a market value of \$844,185 or \$210.94 per square foot of living area, including land, which is slightly above the best comparable sales in terms of total market value but is bracketed by these comparable on a price per square foot basis. 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 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: 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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