



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

APPELLANT: Rob Flood
DOCKET NO.: 22-02022.001-R-1
PARCEL NO.: 07-31-205-020

The parties of record before the Property Tax Appeal Board are Rob Flood, 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: \$13,464
IMPR.: \$72,663
TOTAL: \$86,127

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 one-story dwelling of wood siding exterior construction with 1,784 square feet of living area. The dwelling was constructed in 1964 and has a reported effective age of 1978. Features of the home include a basement,¹ a fireplace and a 616 square foot garage. The property has a 10,020 square foot site and is located in Grayslake, Warren 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 located within .59 of a mile from the subject and have the same assessment neighborhood code as the subject. The sites range in size

¹ The board of review submitted a September 2022 listing of the subject property published with the Multiple Listing Service (MLS) depicting that the subject has a partially finished basement, although this data is not shown on the subject's property record card.

from 8,059 to 11,983 square feet of land area that are improved with one-story dwellings of wood frame exterior construction. The homes range in size from 1,536 to 1,878 square feet of living area and were built from 1951 to 1963 where comparables #2 and #4 have reported effective ages of 1963 and 1977, respectively. Each comparable has a basement and a garage ranging in size from 576 to 922 square feet of building area. Two comparables have central air conditioning and two comparables each have a fireplace. The appellant reported comparable #2 was a recent rehab based on a MLS data sheet depicting the rehab and an addition occurred in 2006. The sheet also described a new roof, siding and windows were also installed. The comparables sold from July 2020 to February 2022 for prices ranging from \$190,000 to \$258,000 or from \$115.57 to \$167.97 per square foot of living area, land included. Based on this evidence, the appellant requested a reduction in the subject's total assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$86,127. The subject's assessment reflects a market value of \$258,407 or \$144.85 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In response to the appeal, the board of review submitted an MLS listing of the subject depicting a listing in September 2022 for an asking price of \$335,000. The property was reportedly on the market for 20 days before being taken off the market and eventually closing for a sales price of \$310,000. Using the same MLS data sheet, the board of review contends that the subject dwelling has a finished basement.

In addition, as to the appellant's comparable sales #1, #2 and #3, the board of review contends that according to the listing comparable #1 "needs remodeling," comparable #2 sold in four days and comparable #3 was a tri-level which sold in "as is" condition. Documentation from the MLS for these assertions was provided as well.

In support of its contention of the correct assessment, the board of review submitted information on ten comparable sales, where board of review comparable #1 is the same property as appellant's comparable #4. The comparables are located from .13 of a mile to 1.09-miles from the subject and eight of the ten properties have the same assessment neighborhood code as the subject. The comparables have sites ranging in size from 5,750 to 43,560 square feet of land area and are each improved with one-story dwellings of brick or wood siding exterior construction. The homes range in size from 1,012 to 2,004 square feet of living area and were built from 1950 to 1993, where comparables #1 and #3 have reported effective ages of 1977 and 1978, respectively. Six of the dwellings each have a basement, four of which have finished area.³ Three of the dwellings each feature one or two fireplaces. Each comparable has central air conditioning and a garage or garages ranging in size from 264 to 576 square feet of building area; it is comparable #8 which features two garages. The comparables sold from May 2021 to June 2022

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). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2022.

³ Board of review comparables #5, #6, #8 and #9 each have reported finished basement area ranging in size from 65 to 804 square feet of building area.

for prices ranging from \$231,000 to \$340,000 or from \$161.59 to \$263.67 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

The appellant did not file rebuttal challenging any of the board of review assertions nor the comparables presented by the board of the review in support of the 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 thirteen comparable sales, as one property was common to both parties, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #2 due to the sale date being in 2020, a date more remote in time than other sales in the record that occurred more proximate to the lien date of January 1, 2022. The Board has also given reduced weight to appellant's comparable #1 and #3 due to condition/sold as-is as reported by the board of review which suggests that the properties may be inferior due to lack of proper maintenance which assertion was not refuted by the appellant in any rebuttal. The Board has given reduced weight to board of review comparables #2, #3, #4 and #7 for their lack of a basement, which is a feature of the subject, and to board of review comparables #5, #9 and #10, due to their smaller dwelling sizes when compared to the subject.

The Board finds the best evidence of market value to be appellant's comparable sale #4/board of review comparable sale #1 as well as board of review comparable sales #6 and #8 which are most similar to the subject property in age, dwelling size, foundation type and some amenities. These most similar comparables sold from May 2021 to February 2022 for prices ranging from \$258,000 to \$269,000 or from \$161.59 to \$172.88 per square foot of living area, including land. The subject's assessment reflects a market value of \$258,407 or \$144.85 per square foot of living area, including land, which is within the range established by the best comparable sales in this record in terms of overall value and below the range on a per-square-foot basis. After considering appropriate adjustments to the best comparables for differences in age/effective age, dwelling size, basement size, basement finished and/or other differences in amenities, based on this evidence, 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:

April 16, 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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