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

APPELLANT: Steve K Sarauer
DOCKET NO.: 23-00101.001-R-1
PARCEL NO.: 16-06-401-007

The parties of record before the Property Tax Appeal Board are Steve K Sarauer, the appellant; 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:** | $140,507 |
| **IMPR.:** | $29,476 |
| **TOTAL:** | $169,983 |

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 2023 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 cedar exterior construction with 2,327 square feet of living area.[1] The dwelling was constructed in 1954 and is approximately 69 years old.[2] Features of the home include a basement with finished area, two fireplaces, and a 1-car garage with 392 square feet of building area.[3] The property has a 69,696 square foot site and is located in Lake Forest, Waukegan Township, Lake County.

---

[1] The parties differ regarding the subject's dwelling size. The Board finds the best evidence of dwelling size is found in the appellant's appraisal, which contains a more detailed sketch with measurements than is found in the subject's property record card presented by the board of review.
[2] The Board finds the best evidence of the subject's year built is found in its property record card.
[3] The Board finds the best evidence of the subject's lack of central air conditioning is found in the appellant's appraisal, given the appraiser inspected the interior of the subject home.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of $472,000 as of January 1, 2023. The appraisal was prepared by R. Steven Kephart, a certified residential real estate appraiser, for ad valorem tax purposes.

The appraiser inspected the subject on November 20, 2023 and prepared the appraisal report on November 29, 2023. The appraiser estimated the subject was built in 1900 and is approximately 123 years old, despite a different year built indicated in the property record card, after inspecting the subject's lathe and plaster walls and stone foundation. The appraiser stated the subject was an original farmhouse prior to subdivision development. The appraiser described the subject home in average dated condition, with original kitchen features and little ongoing repairs and maintenance.

Under the sales comparison approach, the appraiser selected seven comparable sales located from 0.82 of a mile to 2.42 miles from the subject. The appraiser explained due to a lack of sales, the appraiser selected comparables more distant from the subject and which sold within 24 months of the assessment date. The parcels range in size from 8,782 to 21,118 square feet of land area and are improved with 1.5-story or 2-story homes of cedar, frame, vinyl siding, brick, or aluminum siding exterior construction. The homes range in size from 1,199 to 2,897 square feet of living area and range in age from 56 to 90 years old. Each home has a basement, two of which have finished area, central air conditioning, one or two fireplaces, and a 1-car or a 2-car garage. The comparables sold from June 2021 to June 2022 for prices ranging from $395,000 to $550,000 or $155.33 to $358.55 per square foot of living area, including land. The appraiser made adjustments to the comparables for differences from the subject and for sale or financing concessions to arrive at adjusted sale prices ranging from $408,400 to $521,000. Based on this analysis, the appraiser concluded a value for the subject of $472,000 as of January 1, 2023.

Based on this evidence, the appellant requested a reduction in the subject's assessment to $155,760 which would reflect a market value of $467,327 or $200.83 per square foot of living area, including land, 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 $203,890. The subject's assessment reflects a market value of $611,731 or $262.88 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.[4]

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located from 0.79 of a mile to 1.41 miles from the subject. The parcels range in size from 47,045 to 84,071 square feet of land area and are improved with 1-story or 2-story homes of wood siding exterior construction ranging in size from 2,007 to 2,740 square feet of living area. The dwellings range in age from 54 to 95 years old. Two homes each have a basement, one of which has finished area. Each home has central air conditioning, one to three

[4] Section 1910.50(c)(1) of the Board's procedural rules 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. Adm. Code § 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for tax year 2023.

fireplaces, and a garage ranging in size from 441 to 704 square feet of building area. The comparables sold from October 2021 to June 2023 for prices ranging from $478,000 to $593,750 or from $212.60 to $254.11 per square foot of living area, including land. The board of review noted the comparables sold as is as indicated in listing sheets for these sales that were presented. Based on this evidence, the board of review offered to stipulate to a reduced assessment of $173,269.

In written rebuttal, the appellant rejected the board of review's offer. The appellant argued the subject's assessment had been reduced in 2021 and 2022 following a sale of the subject in 2020 for a price of $350,000. The appellant asserted the subject home is the original home built in 1898, which has not increased in dwelling size. The appellant confirmed the subject does not have central air conditioning.

## 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.Adm.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.Adm.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant presented an appraisal and the board of review presented four comparable sales for the Board's consideration. The Board gives less weight to the appraisal submitted by the appellant. Although the appraiser explained it was necessary to locate sales more distant from the subject and which sold 24 months from the assessment date, the board of review located sales that sold more proximate in time to the assessment date within the same search parameters. The appraiser did not explain why the board of review's comparables were not selected as comparable sales. The comparables selected by the appraiser differ significantly from the subject in site size whereas the board of review's comparables are relatively similar to the subject in site size. For these reasons, the Board finds the appraisal states a less credible and/or reliable opinion of value and the Board will instead consider the raw sales data presented in the appraisal and by the board of review.

The record contains eleven comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #3 through #7 and the board of review's comparable #3, which sold less proximate in time to the assessment date than other sales in this record. The Board also gives less weight to the appraisal sales #1 and #2, which have significantly smaller sites than the subject.

The Board finds the best evidence of market value to be the board of review comparables #1, #2, and #4, which sold proximate in time to the assessment date and are more similar to the subject in dwelling size, site size, and some features, although these homes are significantly newer homes than the subject's home, suggesting downward adjustments to these comparables for age would be needed to make them more equivalent to the subject. However, two comparables are 1-story homes compared to the subject's 2-story home and each lacks a basement that is a feature of the subject, suggesting upward adjustments to these comparables for these features would be needed to make them more equivalent to the subject. These most similar comparables sold for prices ranging from $510,000 to $593,750 or from $212.60 to $254.11 per square foot of living area, including land. The subject's assessment reflects a market value of $611,731 or $262.88 per square foot of living area, including land, which is above the range established by the best comparable sales in the record and appears to be excessive. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment 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: ____________ ____________

C E R T I F I C A T I O N

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: October 15, 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 <u>PETITION AND EVIDENCE</u> 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Steve K Sarauer
1164 Gavin Court
Lake Forest, IL 60045

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085