



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

APPELLANT: Subroto Mukherjee  
DOCKET NO.: 23-00184.001-R-1  
PARCEL NO.: 07-18-408-023

The parties of record before the Property Tax Appeal Board are Subroto Mukherjee, 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 **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:** \$20,254  
**IMPR.:** \$108,316  
**TOTAL:** \$128,570

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 two-story dwelling of wood siding exterior construction with 2,411 square feet of living area. The dwelling was constructed in 1995 and is approximately 28 years old. Features of the home include an unfinished basement, central air conditioning, a fireplace and a two-car garage with 420 square feet of building area. The property has a 13,068 square foot site and is located in Gurnee, Warren Township, Lake County.

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 \$340,000 as of January 1, 2023. The appraisal was prepared by Kenneth M. Jones, a Certified Residential Real Estate Appraiser. The property rights appraised were fee simple and the purpose of the ad valorem appraisal was to determine the estimated fair cash value for a real estate tax appeal only. The appraiser described the subject property to be in average condition with typical updating being performed to the kitchen and bathrooms.

In estimating the subject's market value, the appraiser developed the sales comparison approach to value utilizing five comparable sales that are located within .49 of a mile from the subject property. The comparables are described as colonial or multi-level dwellings of vinyl or brick and vinyl exterior construction ranging in size from 2,299 to 2,858 square feet of living area and are approximately 27 to 29 years old. The comparables each have a basement, two of which have finished area. Each comparable has central air conditioning and a two-car garage. Four comparables each have a fireplace. The comparables have sites ranging in size from 6,534 to 13,068 square feet of land area. The properties sold from January to December 2022 for prices ranging from \$320,000 to \$370,000 or from \$126.48 to \$151.81 per square foot of living area, including land. The appraiser applied adjustments to the comparables for differences when compared to the subject in bathroom count, gross living area, basement finish and number of fireplaces to arrive at adjusted prices ranging from \$310,200 to \$352,100. Based on the adjusted sale prices, the appraiser estimated the subject had a market value of \$340,000 as of January 1, 2023.

Based on this evidence, the appellant requested an assessment reflective of the appraised value conclusion at 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 \$128,570. The subject's assessment reflects a market value of \$385,749 or \$160.00 per square foot of living area, including land, when using the statutory level of assessment of 33.33%.<sup>1</sup>

In support of its contention of the correct assessment of the subject property the board of review submitted information on four comparable sales with the same assessment neighborhood code as the subject and located within .20 of a mile from the subject property. The comparables have sites that range in size from 8,712 to 11,761 square feet of land area. The comparables are improved with two-story dwellings of wood siding exterior construction, each containing 2,411 square feet of living area. The dwellings are 26 or 28 years old. The comparables each have a basement, three of which have finished area. Each comparable has central air conditioning, a fireplace and a 420 square foot garage. The properties sold from January to June 2022 for prices ranging from \$394,900 to \$447,500 or from \$163.79 to \$185.61 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

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<sup>1</sup> 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 2023.

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 appellant submitted an appraisal of the subject property and the board of review submitted four comparable sales to support their respective positions before the Board. The Board has given less weight to the appellant's appraiser's conclusion of value as the appraiser utilized five comparables that are less similar to the subject in dwelling size, when there were other available comparables that were identical to the subject in dwelling size that were utilized by the board of review. Additionally, the appraisal comparable #4 is a dissimilar multi-level design, when compared to the subject's two-story colonial design. Lastly, the appraiser made no adjustments for differences in site size without explanation, although appraisal comparables #2 and #5 have considerably smaller site sizes, when compared to the subject. For these reasons, the Board does not find the appraiser's conclusion of value to be a reliable indicator of value.

The Board finds the best evidence of the subject's market value to be the four comparables submitted by the board of review, which are identical to the subject in dwelling size and design, and are similar to the subject in location, age and some features. However, the Board finds three of the four comparables have basement finish, unlike the subject and one comparable has an additional bathroom, suggesting downward adjustments would be required to make these comparables more equivalent to the subject. Nevertheless, these four properties sold from January to June 2022 for prices ranging from \$394,900 to \$447,500 or from \$163.79 to \$185.61 per square foot of living area, including land. The subject's assessment reflects a market value of \$385,749 or \$160.00 per square foot of living area, land included, which falls below the range established by the best comparable sales in the record. However, after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's lower market value as reflected by its assessment is justified. Therefore, based on this evidence, 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: \_\_\_\_\_

November 19, 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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COUNTY

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