FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Ravindra Moorut
DOCKET NO.: 23-00508.001-R-1
PARCEL NO.: 13-02-204-009

The parties of record before the Property Tax Appeal Board are Ravindra Moorut, the appellant, by attorney Gregory Riggs, of Tax Appeals Lake County in Lake Zurich; 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:	$26,821
IMPR.:	$166,856
TOTAL:	$193,677

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 1-story dwelling of brick exterior construction with 2,345 square feet of living area. The dwelling was constructed in 2001 and is approximately . Features of the home include a basement, central air conditioning, a fireplace, and a 782 square foot garage. The property has a 40,075 square foot site and is located in Tower Lakes, Cuba 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[1] located from 0.27 to 0.78 of a mile from the subject. The parcels range in total combined size from 20,000 to 62,758 square feet of land area and are improved with 1-story homes of frame or brick exterior construction ranging in

[1] The appellant completed the grid analysis for nine parcels, but five of these parcels are part of multi-parcel properties, totaling four properties which are renumbered as comparables #1 through #4 for ease of reference.

size from 2,133 to 2,772 square feet of living area. The dwellings were built from 1952 to 2004 with comparables #1, #2, and #4 having effective ages of 1969, 1958, and 1986, respectively. Each home has a basement, two of which are a lookout or a walkout and three of which have finished area. Three homes have central air conditioning. Each comparable has one or two fireplaces and a garage ranging in size from 525 to 875 square feet of building area. The comparables sold from January 2020 to July 2023 for prices ranging from $425,000 to $627,500 or from $156.93 to $226.53 per square foot of living area, including land. The appellant submitted a listing sheet for comparable #2 indicating it was listed for 6 days. 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 $193,677. The subject's assessment reflects a market value of $581,089 or $247.80 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 located from 0.56 to 0.78 of a mile from the subject. Comparable #1 is the same property as the appellant's comparable #4. The parcels range in size from 32,925 to 73,578 square feet of land area and are improved with 1-story homes of frame exterior construction ranging in size from 2,770 to 3,187 square feet of living area. The dwellings were built from 1964 to 1976. Each home has a walkout basement with finished area, central air conditioning, two or three fireplaces, and a garage ranging in size from 783 to 910 square feet of building area. The comparables sold in June 2022 and May 2023 for prices ranging from $627,500 to $803,000 or from $226.53 to $270.10 per square foot of living area, including land.

The board of review submitted a brief from the township assessor's office contending the subject is a newer home than the comparables and has a lookout basement that was not reflected in its 2023 tax year assessment. It was argued the appellant's comparable #2 is a dated home and the appellant's comparable #3 is a dated sale. 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 record contains a total of six comparable sales, with one common sale, for the Board's consideration. The Board gives less weight to the appellant's comparable #3, which sold less

[2] 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. Admin. 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.

proximate in time to the assessment date than the other sales in this record, and to the appellant’s comparable #2, which lacks central air conditioning that is a feature of the subject. The Board gives less weight to the board of review’s comparables #2 and #3, due to substantial differences from the subject in dwelling size.

The Board finds the best evidence of market value to be the appellant’s comparable #1 and the appellant’s comparable #4/board of review’s comparable #1, which sold more proximate in time to the assessment date and are more similar to the subject in dwelling size, location, and some features, although these homes are substantially older homes than the subject, have finished basement area unlike the subject, and have varying degrees of similarity to the subject in site size, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. These two most similar comparables sold for prices of $500,000 and $627,500 or $204.33 and $226.53 per square foot of living area, including land. The subject's assessment reflects a market value of $581,089 or $247.80 per square foot of living area, including land, which is bracketed by the best comparable sales in terms of total market value and above the range on a price per square foot basis, but appears to be supported after considering appropriate adjustments to the best comparables for differences from the subject. 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:

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: August 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

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