FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Stevan Cooper
DOCKET NO.: 23-00544.001-R-1
PARCEL NO.: 02-19-303-005

The parties of record before the Property Tax Appeal Board are Stevan Cooper, 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:	$12,870
IMPR.:	$112,178
TOTAL:	$125,048

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 one-story dwelling of wood siding exterior construction with 1,951 square feet of living area. The dwelling was constructed in 1978 and is approximately 45 years old. Features include a basement with 1,561 square feet of finished area, central air conditioning, three full and one-half bathrooms, a fireplace and a 600 square foot garage. The property has an approximately 42,001 square foot site and is located in Antioch, Antioch 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 along with a brief. The brief contends that only comparables #1 and #3 are within the subject's neighborhood and that comparable #2 is "nearby" with a reported proximity of 1.18-miles from the subject. Counsel further asserted comparable #1 is a larger home than the subject. The three comparables have sites ranging in size from 39,204 to 46,609 square feet of land area that are improved with one-story dwellings of wood siding exterior construction containing either 1,712 or 2,247 square feet of living area. The dwellings were either 41 or 46 years old. The comparables have basements and two comparables have central air conditioning. Two homes each have one full and one-half bathroom and one comparable has three full bathrooms. Each comparable has one fireplace and a garage ranging in size from 440 to 1,044 square feet of building area. The comparables sold from June 2021 to February 2023 for prices ranging from $326,000 to $355,000 or from $145.08 to $207.36 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 $125,048. The subject's assessment reflects a market value of $375,182 or $192.30 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.[1]

In support of its contention of the correct assessment, the board of review submitted data prepared by the Antioch Township Assessor, Lee D. Perry, namely, a memorandum, the subject's property record card and information on four comparable sales, where board of review comparables #1 and #4 are the same properties as appellant's comparables #3 and #2, respectively.

In the memorandum, the appellant's description of the subject was criticized for failing to include the 1,561 square feet of finished basement area. The appellant's comparables were also criticized by Perry noting fewer bathrooms, either no finished basement for comparables #1 and #2 or less finished basement area for comparable #3 and/or a smaller garage, as compared to the subject.

The board of review comparable sales are each located in Antioch and from .21 to 1.18-miles from the subject property. The parcels range in size from 41,426 to 50,699 square feet of land area and are each improved with a one-story dwelling of wood siding exterior construction. The homes range in age from 36 to 66 years old and range in size from 1,459 to 1,872 square feet of living area. Each comparable has a basement, three of which have finished area ranging in size from 919 to 1,370 square feet. Each comparable has central air conditioning and either two full or three full bathrooms, while two homes have either one half bath or two half baths. Each comparable has one or two fireplaces and a garage ranging in size from 440 to 916 square feet of building area. The comparables sold from June 2021 to February 2023 for prices ranging from $295,000 to $364,000 or from $192.17 to $207.36 per square foot of living area, including land.

Based on the foregoing evidence and argument, the board of review requested confirmation of the subject's assessment.

[1] 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 issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2023.

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 presented a total of five comparable sales, two of which are common to both parties, in support of their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparable #2 due to its age of 66 years as compared to the subject dwelling of 45 years and each of the other sales comparables that are closer in age to the subject property.

The Board finds the best evidence of market value to be the appellant's comparable sales and board of review comparable sales #1, #3 and #4, which includes the parties' two common comparables. The properties present varying degrees of similarity to the subject which necessitate consideration of adjustments for differences in age, dwelling size, bathrooms, basement size, basement finish and/or other amenities when compared to the subject. These most similar comparables sold for prices ranging from $326,000 to $364,000 or from $145.08 to $207.36 per square foot of living area, including land. The subject's assessment reflects a market value of $375,182 or $192.30 per square foot of living area, including land, which is above the range established by the best comparable sales in this record in terms of overall value, but within the range on a per-square-foot of living area basis, which appears logical given the subject's age, number of bathrooms and larger finished basement area when compared to the best comparables. Based on this evidence and after considering adjustments to the best comparables sales for differences when compared to the subject, the Board finds a reduction in the subject's assessment on grounds of overvaluation 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.

Docket No: 23-00544.001-R-1

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

Stevan Cooper, by attorney:
Ronald Kingsley
Lake County Real Estate Tax Appeal, LLC
40 Landover Parkway
Suite 3
Hawthorn Woods, IL 60047

COUNTY

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