



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

APPELLANT: Richard Zaehring  
DOCKET NO.: 23-00668.001-R-1  
PARCEL NO.: 06-22-300-035

The parties of record before the Property Tax Appeal Board are Richard Zaehring, 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:** \$49,533  
**IMPR.:** \$141,610  
**TOTAL:** \$191,143

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 is improved with 2½-story dwelling of wood siding and stucco exterior construction with 5,102 square feet of living area. The dwelling was constructed in 1923 and is approximately 100 years old. Features of the home include a crawl space foundation, central air conditioning, two fireplaces,<sup>1</sup> and 4½ bathrooms. The subject property also has finished attic area, a detached two-car garage with 440 square feet of building area, a 280 square foot frame

---

<sup>1</sup> The appellant's appraisal reported the subject property has two fireplaces on page one of the report, however, the appraisal grid analysis indicates the subject has one fireplace. The board of review reported the subject has one fireplace. The Board finds; however, the appellant's appraisal contains interior photographs of the subject depicting a fireplace on the first floor and fireplace on the second floor. Therefore, the Board finds the subject property has two fireplaces.

utility shed, and a pier. The property has a 47,063 square foot site located in Grayslake, Avon Township, Lake County.<sup>2</sup>

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 \$410,000 as of April 22, 2020. The appraisal was prepared by Scott Garfinkel, a State of Illinois Certified Residential Real Estate Appraiser. The purposed of the appraisal was to estimate the market value of the fee simple estate of the subject property as of the effective date of the appraisal.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value using six comparable sales. The comparables are described as being improved with three traditional style homes, two raised-ranch style dwellings, and Queen Anne style dwelling, that range in size from 1,980 to 5,450 square feet of living area. The homes range in age from 37 to 127 years old. Five of the comparables have basements with three having finished area, five comparables have one or three fireplaces, and four comparables also have boat piers. Each comparable has central air conditioning, three to six bathrooms, and a 2-car, 3-car, or a 6-car garage. These properties have sites ranging in size from 7,357 to 103,237 square feet of land area. The comparables are located from approximately .08 to 6.13 miles from the subject property. The sales occurred from July 2018 to April 2020 for prices ranging from \$245,000 to \$650,000 or from \$76.90 to \$226.26 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject to arrive at adjusted prices ranging from \$372,480 to \$503,395. Based on this analysis the appraiser estimated the subject property had a market value of \$410,000 as of April 22, 2020.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$191,143. The subject's assessment reflects a market value of \$573,486 or \$112.40 per square foot of living area, land included, when using the statutory level of assessment.<sup>3</sup>

In rebuttal the board of review argued the appellant's appraisal has an effective date of April 22, 2020, using sales from 2018, 2019 and 2020, and it did not believe the appraisal was a credible indication of value for the subject as of the January 1, 2023, assessment date.

In support of its contention of the correct assessment the board of review submitted information on one comparable sale improved with a two-story dwelling with a vinyl siding exterior containing 5,936 square feet of living area. The dwelling is approximately 159 years old. Features of the home include a full basement with finished area, central air conditioning, three fireplaces, 6½ bathrooms, and detached garage with 1,672 square feet of building area. The

---

<sup>2</sup> The Property Tax Appeal Board found the best evidence of the subject's dwelling size was contained in the appellant's appraisal. The Board further finds the subject's property record card disclosed the subject property has 1.584 acres of land area with 1.0804 acres or 47,063 square feet of residential land area and .5036 acres or 21,936 square feet of lake bottom area.

<sup>3</sup> Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2023.

property has a 126,469 square foot site. The comparable has the same assessment neighborhood code as the subject and is located approximately .12 of a mile from the subject property. The property sold in October 2021 for a price of \$1,500,000 or \$252.70 per square foot of living area, including land.

### **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 Board finds the appraisal submitted by the appellant is somewhat dated with an effective date of April 22, 2020, with reference to the assessment date at issue of January 1, 2023, which detracts from the weight that can be given the conclusion of value contained in the report. Additionally, the sales in the report did not occur proximate in time to the assessment date. Nevertheless, the sales in the appraisal had prices ranging from \$245,000 to \$650,000 or from \$76.90 to \$226.26 per square foot of living area, including land. The subject's assessment reflects a market value of \$573,486 or \$112.40 per square foot of living area, land included, which is within the range of the unadjusted sales prices of the appellant's appraisal comparable sales, which support the conclusion the subject property is not overvalued.

The board of review provided a comparable that sold more proximate in time to the assessment date than the sales in the appellant's appraisal. Additionally, the comparable is similar to the subject in location and relative dwelling size. The board of review comparable sold for a price of \$1,500,000 or \$252.70 per square foot of living area, including land. The subject's assessment reflecting a market value of \$573,486 or \$112.40 per square foot of living area, including land, is significantly below the overall best sale in the record, demonstrating the subject property is not overvalued.

Based on this evidence the Board finds the subject's assessment is reflective of the property's fair cash value and 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: \_\_\_\_\_

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 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

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

APPELLANT

Richard Zaehring, 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