FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Elisabeth Cunnison
DOCKET NO.: 23-00700.001-R-1
PARCEL NO.: 16-09-114-005

The parties of record before the Property Tax Appeal Board are Elisabeth Cunnison, 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:	$71,944
IMPR.:	$130,555
TOTAL:	$202,499

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 frame exterior construction with 2,430 square feet of living area. The dwelling is 54 years old. Features of the home include a partial basement with finished area, central air conditioning, three fireplaces, and a garage with 462 square feet of building area. The property has a 12,750 square foot site and is located in Lake Forest, West Deerfield 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 improved with two-story dwellings of frame or brick exterior construction that range in size from 2,200 to 2,842 square feet of living area. The homes were built in either 1967 or 1968 and have sites ranging in size from 12,750 to 14,200 square feet of land area. Each comparable has a full or partial basement with finished area, central air conditioning, a fireplace, and a garage ranging in size from 445 to 650 square feet of building area. The comparables have the same assessment neighborhood code as the subject and are located from 0.05 to 0.26 of a mile from the subject property. The sales occurred from May 2022 to January 2023 for prices ranging from $530,000 to $650,000 or from $207.68 to $255.10 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to $182,232.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $202,499. The subject's assessment reflects a market value of $607,557 or $250.02 per square foot of living area, land included, when applying the statutory level of assessments of 33.33%.[1]

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with two-story dwellings of brick or frame exterior construction that range in size from 2,164 to 2,548 square feet of living area. The board of review's comparable #3 is the same as the appellant's comparable #4. The homes are from 47 to 57 years old and have sites ranging in size from 12,750 to 20,040 square feet of land area. Each comparable has a full or partial basement with two having finished area, central air conditioning, a fireplace, and a garage ranging in size from 424 to 650 square feet of building area. The comparables have the same assessment neighborhood code as the subject and are located from 0.05 to 0.19 of a mile from the subject property. The sales occurred from May 2022 to April 2023 for prices ranging from $550,000 to $849,000 or from $250.00 to $334.65 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 record contains a total of seven comparable sales, with one common property, for the Board's consideration. The Board gives less weight to the appellant's comparable #3 due to differences from the subject in terms of dwelling size. The Board gives less weight to the board of review's comparables #4 based on differences from the subject with respect to age and dwelling size. The Board finds the best evidence of market value to be the remaining comparable sales, which are improved with dwellings that are relatively similar to the subject in location, age, style, and features, although adjustments to these comparables to account for differences in some features, would be needed to make them more equivalent to the subject. These most similar comparables sold from May 2022 to March 2023 for prices ranging from $530,000 to $849,000 or from $207.68 to $334.65 per square foot of living area, including land.

[1] 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 Section 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for the tax year 2023.

The subject's assessment reflects a market value of $607,557 or $250.02 per square foot of living area, land included, which falls within the range established by best comparable sales in this record. 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

AGENCY

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