



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

APPELLANT: Nasser Adi
DOCKET NO.: 23-00709.001-R-1
PARCEL NO.: 11-29-402-013

The parties of record before the Property Tax Appeal Board are Nasser Adi, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook, 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: \$74,041
IMPR.: \$346,725
TOTAL: \$420,766

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 brick exterior construction with 6,246 square feet of living area.¹ The dwelling was constructed in 2005 and is approximately 18 years old. Features of the home include a basement, central air conditioning, three fireplaces, and a 757 square foot garage. The property has a 16,117 square foot site and is located in Vernon Hills, Libertyville 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 \$1,100,000 as of January 1, 2023. The appraisal was prepared by Cindy Gotshall, a certified real estate appraiser, for ad valorem purposes.

¹ The parties differ with respect to the subject's total square feet of living area; however, the appellant's appraisal has detailed, room-by-room, measurements for the subject dwelling and its respective living areas.

Under the sales comparison approach, the appraiser selected four comparable sales located in the same neighborhood and within 0.57 of a mile of the subject, two of which are located on the same street as the subject property. The parcels range in size from 14,200 to 25,583 square feet of land area and are improved with two-story dwellings of brick or frame exterior construction ranging in size from 4,100 to 5,275 square feet of living area. The dwellings are from 1 to 20 years old. The comparables sold from September 2021 to August 2022 for prices ranging from \$945,000 to \$1,195,000 or from \$185.97 to \$291.46 per square foot of living area, including land. The appraiser made adjustments to the comparables for differences from the subject in age, lot view, condition, gross living area, total rooms, finished basement area, and for full and half bathrooms to arrive at adjusted sales prices ranging from \$1,063,800 to \$1,281,000 or from \$201.67 to \$312.44 per square foot of living area, including land. Based on this analysis, the appraiser concluded a value of \$1,100,000 for the subject as of January 1, 2023.

Based on this evidence, the appellant requested a reduction in the subject's total assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$420,766. The subject's assessment reflects a market value of \$1,262,424 or \$202.12 per square foot of living area, land included, when applying the statutory level of assessments of 33.33%.²

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 and brick exterior construction that range in size from 4,090 to 5,542 square feet of living area. The board of review's comparables #1 and #2 are the same properties that are also within the appellant's appraisal, which were similarly identified as comparable #1 and #2. The homes were constructed from 2003 to 2010 and have sites ranging in size from 15,246 to 23,087 square feet of land area. Each comparable has a basement, central air conditioning, one to four fireplaces, and a garage ranging in size from 741 to 795 square feet of building area. The comparables have the same assessment neighborhood code, with three located on the same street, as the subject and are within 0.14 of a mile from the subject property. The sales occurred from November 2020 to June 2022 for prices ranging from \$945,000 to \$1,190,000 or from \$200.20 to \$231.05 per square foot of living area, including land. The board of review requested the subject's total assessment be confirmed.

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

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 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.

construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant has not meet this burden of proof and a reduction in the subject's assessment is not warranted.

In support of their respective arguments, the appellant presented an appraisal and the board of review offered four comparable sales for the Board's consideration, two of which were also comparables utilized in the appellant's appraisal. The Board gives less weight to the board of review's comparable #4 because the date of sale is less proximate in time to the subject's January 1, 2023, assessment date as the other comparables in this record. The Board finds the best evidence of market value to be the remaining five raw sales offered by both parties. These comparables were sold from September 2021 to August 2022 for prices ranging from \$945,000 to \$1,195,000 or from \$185.97 to \$291.46 per square foot of living area, including land. The Board finds these properties are relatively similar to the subject in style of construction, age, size, features and location, with two located on the same street as the subject and used by the board of review as comparables, although adjustments to these comparables to account for differences in lot size and amenities would be required.

The subject's assessment reflects a market value of \$1,262,424 or \$202.12 per square foot of living area, including land, which is above the best sales comparables on an overall market value basis, but is within the range on a per square foot basis. Based on this evidence and after considering appropriate adjustments, 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: _____

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

Nasser Adi, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld & Associates, LLC
40 Skokie Blvd
Suite 150
Northbrook, IL 60062

COUNTY

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