



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

APPELLANT: James Kaufman
DOCKET NO.: 23-00774.001-R-1
PARCEL NO.: 16-04-205-008

The parties of record before the Property Tax Appeal Board are James Kaufman, 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: \$79,441
IMPR.: \$95,238
TOTAL: \$174,679

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 2-story dwelling of wood siding exterior construction with 1,546 square feet of living area. The dwelling was built in 1951, is approximately 72 years old, and has an effective age of 1987. Features of the home include a crawl space foundation, central air conditioning, one fireplace, 1 full bathroom, and a garage with 384 square feet of building area. The property has an approximately 8,097 square foot site and is located in Lake Forest, Moraine 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 that are located in the subject's neighborhood code and within 0.14 of a mile from the subject. The comparables have sites ranging from 7,970 to 11,850 square feet of land area. The comparables are improved with 1.5-story or 1.75-story dwellings of brick or frame exterior construction ranging in size from 1,328

to 2,094 square feet of living area. The dwellings were built in either 1920 or 1947 with effective ages ranging from 1929 to 1985. The comparables each have a basement, one of which has finished area. Each comparable has central air conditioning, one fireplace, and a garage that ranges from 220 to 440 square feet of building area. The homes have either one or two full bathrooms and either one or two half bathrooms. The properties sold from February 2021 to June 2022 for prices of either \$480,500 or \$620,000 or from \$296.08 to \$361.82 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$155,648 which reflects a market value of \$466,991 or \$302.06 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$174,679. The subject's assessment reflects a market value of \$524,089 or \$339.00 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.¹

The board of review's grid indicated that its comparable sales #1 and #2 were shared with the appellant. The board of review provided copies of the "Listing & Property History Report" for the appellant's comparables #1 and #3 which disclosed these comparables sold in two days and one day, respectively, after their listing date with comparable #1 selling for more than its original listing price. The board of review also noted at the bottom of the grid that its sales were all located in the subject's Highview Terrace neighborhood.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located within 0.24 of a mile from the subject, two of which have the subject's neighborhood code. The comparables have sites ranging in size from 8,105 to 11,851 square feet of land area. The comparables are improved with 1-story or 1.5-story dwellings of brick exterior construction ranging in size from 1,328 to 1,551 square feet of living area. The homes are from 63 to 76 years old. Each comparable has a basement with finished area, central air conditioning and either one or two fireplaces. Three comparables each have a garage that ranges in size from 220 to 441 square feet of building area. The homes each have from one to three full bathrooms, two of which also have a half bathroom. The properties sold from February 2021 to February 2023 for prices ranging from \$480,000 to \$581,798 or from \$357.14 to \$375.11 per square foot of living area, land included. 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

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 drafting of this decision, the Department of Revenue has not published figures for tax year 2023.

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 five comparable sales for the Board's consideration, two of which are shared by the parties. The Board finds none of the parties' comparables to be truly similar to the subject as each comparable presents significant differences from the subject in age/effective age, dwelling size, foundation type, bathroom count, and/or other features. Nevertheless, the Board gives less weight to the appellant's comparables #1 and #2 as well as board of review comparables #1 and #2, which are the common comparables, which sold in 2021, less proximate in time to the appellant's January 1, 2023 assessment date at issue than the other comparables in this record. The Board also gives less weight to the appellant's comparable #3 which is a significantly larger home than the subject.

The Board finds the best evidence of market value to be board of review comparable sales #3 and #4. These two comparables sold proximate in time to the subject's assessment date and are similar in age and dwelling size with varying degrees of similarity in design, bathroom count, basement foundation, and other features. Each of these comparables would require downward adjustments, when compared to the subject, for their slightly newer age, basement foundations which the subject lacks, larger bathroom count, and/or larger number of fireplaces. Conversely, board of review comparable #4 would require an upward adjustment for its lack of a garage, a feature of the subject. Each comparable would also require an appropriate adjustment for their 1-story design when compared to the subject's 2-story design. Nevertheless, the two properties sold in March 2022 and February 2023 for prices of \$540,000 and \$581,798 or \$357.14 and \$375.116 per square foot of living area, land included. The subject's assessment reflects an estimated market value of \$524,089 or \$339.00 per square foot of living area, land included, which falls below the two best comparable sales in this record. Therefore, based on this record and after considering the adjustments required for the aforementioned differences in the best comparables when compared to the subject, the Board finds the appellant did not prove by a preponderance of that the subject's estimated market value as reflected by its assessment should be reduced and a reduction in the subject's assessment is not warranted.

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: _____

November 19, 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

James Kaufman, by attorney:
Gregory Riggs
Tax Appeals Lake County
830 West IL Route 22
Suite 286
Lake Zurich, IL 60047

COUNTY

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