



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

APPELLANT: Todd E. & Heidi M. Willis  
DOCKET NO.: 23-01246.001-R-1  
PARCEL NO.: 13-03-304-014

The parties of record before the Property Tax Appeal Board are Todd E. & Heidi M. Willis, the appellants, by attorney Chris D. Sarris, of Steven B. Pearlman & Associates in Chicago; 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:** \$35,055  
**IMPR.:** \$192,994  
**TOTAL:** \$228,049

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 parties appeared before the Property Tax Appeal Board for a hearing at the Lake County Board of Review Office in Waukegan pursuant to a prior written notice. Appearing on behalf of the appellant was attorney, Chris Sarris, and appearing on behalf of the Lake County Board of Review was Mass Appraisal Specialist, Jack Perry.

The subject property consists of a 2-story dwelling of frame and brick exterior construction with 3,996 square feet of living area. The dwelling was constructed in 1998. Features of the home include a basement with finished area, central air conditioning, three fireplaces and a 689 square foot garage. The property has a 41,902 square foot site and is located in Lake Barrington, Cuba Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted evidence disclosing the subject property was purchased on January 6, 2020, for a price of \$605,000 and the seller was Glenn A. Forrest and Barbara E. Forrest, as Trustees of Glenn and Barbara Forest Living Trust. The appellants further disclosed the parties to the transaction are not related, the property was sold by a realtor, and it was advertised for sale through the Multiple Listing Service (MLS) for a period of 243 days. To document the sale, the appellants submitted the Master Settlement Statement that disclosed real estate commissions were paid to two entities. The appellants also submitted copy of the MLS listing associated with the sale of the subject property. The appellants assert the board of review did not contest the arm's length nature of the subject sale in 2020. Based on this evidence, the appellants requested a reduction in the subject's total assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$228,049. The subject's assessment reflects a market value of \$684,215 or \$171.22 per square foot of living area, land included, when applying the statutory level of assessment.<sup>1</sup>

At the hearing the board of review did not dispute the arm's length sale of the subject in 2020 but the board of review contends the January 2020 of the subject does not represent market value conditions as of the January 1, 2023, assessment date. The board of review asserts the subject sale took place during the "pandemic lockdowns" and prior to the market surge that occurred after lockdowns. The board of review also stated the property was reduced to the purchase price in 2020 and was then carried forward through 2022 with equalization. The board of review stated in 2023 which was the beginning of the new assessment period the subject was reassessed according to state law.

In support of the subject's assessment, the board of review submitted information on three comparable sales located within .27 of a mile from the subject property. The comparables are situated on sites ranging in size from 40,646 to 41,296 square feet of land area and are improved with 2-story dwellings of frame and brick exterior construction that range in size from 3,647 to 4,484 square feet of living area. The dwellings were built from 1994 to 2002. Each comparable has central air conditioning, two fireplaces, and a garage ranging in size from 702 to 984 square feet of building area. The comparables sold in January or May 2023 for prices ranging from \$657,500 to \$950,000 or from \$180.29 to \$211.86 per square foot of living area, including land. Based on this evidence, the board of review requested that the subject property's assessment be confirmed.

In rebuttal at the hearing the appellants' argued that a recent sale within three years of the assessment date is the best evidence of market value as Section IV – Recent Sale Data in the appellant's petition states "When the appellant supplies evidence of a recent sale of a residence and the Board of Review has not refuted the arm's length nature of the transaction, the Property Tax Appeal Board generally finds that the sale price of a recent arm's length sale of the subject

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<sup>1</sup> 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 yet to publish figures for tax year 2023.

property is the best evidence of market value.” In support of this argument the appellants submitted Hearing Exhibits A, B and C without objection from the board of review’s representative.

### **Conclusion of Law**

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains information on the recent sale of the subject property submitted by the appellants and the board of review provided information on three comparable sales to support their respective positions before the Board.

The Board gave less weight to the January 2020 sale of the subject which occurred approximately 3 years prior to the January 1, 2023, assessment date and is less likely to be reflective of market value as of the assessment date at issue. Furthermore, the board of review indicated property values significantly increased from January 2020 to January 2023 which was unrefuted by the appellants.

The Board finds the best evidence of market value to be the board of review comparables which sold more proximate in time to the assessment date at issue. These comparables are also relatively similar to the subject in location, age, dwelling size and features. These properties sold in January or May 2023 for prices ranging from \$657,500 to \$950,000 or from \$180.29 to \$211.86 per square foot of living area, including land. The subject's estimated market value of \$684,215 or \$171.22 per square foot of living area, including land, as reflected by the assessment falls at the lower end of the range established by the best comparable sales in the record on an overall market value basis but falls below on a price per square foot basis. Therefore, after considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the subject’s estimated market value as reflected by the assessment is well supported 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: \_\_\_\_\_

January 21, 2025



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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