



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

APPELLANT: Patrick Rice  
DOCKET NO.: 23-01629.001-R-1  
PARCEL NO.: 16-36-203-005

The parties of record before the Property Tax Appeal Board are Patrick Rice, 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 **A Reduction** 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:** \$124,262  
**IMPR.:** \$111,238  
**TOTAL:** \$235,500

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 a two-story dwelling with 2,974 square feet of living area. The dwelling was constructed in 1910 and is approximately 113 years old.<sup>1</sup> Features of the home include a full unfinished basement, one fireplace, and 3½ bathrooms. The property has a 19,275 square foot site located in Highland Park, Moraine 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 that range in size from 2,524 to 2,956 square feet of living area. The homes range in age from 86 to 113 years old. Each property has a basement with two having finished area, one or two fireplaces, 2½ to 3½ bathrooms, and a garage ranging in size from 190 to 528 square feet of

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<sup>1</sup> The subject is described on the property record card as having an exterior construction of "SU" although there is no explanation as to the meaning of the abbreviation.

building area. Three comparables have central air conditioning. These properties have sites ranging in size from 10,363 to 12,558 square feet of land area. The comparables have the same assessment neighborhood code as the subject and are located from approximately .15 to .87 of a mile from the subject property. The sales occurred from April 2022 to July 2022 for prices ranging from \$515,000 to \$750,000 or from \$177.40 to \$283.02 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$266,642.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$278,749. The subject's assessment reflects a market value of \$836,331 or \$281.21 per square foot of living area, land included, when using the statutory level of assessment of 33 1/3%.<sup>2</sup>

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 stone, brick, or wood siding exterior construction that range in size from 2,765 to 3,136 square feet of living area. The homes range in age 76 to 86 years old. Each home has a basement with finished area, central air conditioning, 1 to 3 fireplaces, 3½ bathrooms, and a garage ranging in size from 380 to 529 square feet of building area. The comparables have sites ranging in size from 10,465 to 17,930 square feet of land area. These properties have the same assessment neighborhood code as the subject and are located from approximately .15 to .77 of a mile from the subject property. The sales occurred from October 2021 to December 2022 for prices ranging from \$964,500 to \$1,305,000 or from \$307.56 to \$471.97 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains information on eight comparable sales similar to the subject property in location to support their respective positions. The comparables submitted by the parties are superior to the subject in features in that six have finished basement area, seven have central air conditioning, and each comparable has a garage ranging in size from 190 to 529 square feet of building area, features the subject does not have, requiring downward adjustments to the comparables to make them more equivalent to the subject for these characteristics. Additionally, four of the comparables have one or two more fireplaces than the subject, necessitating downward adjustments to make them more equivalent to the subject for this feature. Finally, seven of the comparables are from approximately 21 to 37 years newer than the subject dwelling suggesting these properties would also require downward adjustments to make them more

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<sup>2</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 §1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2023.

equivalent to the subject in age. The Board further finds board of review comparables #1 and #2 sold in 2021, less proximate in time to the assessment date than the remaining comparables in this record, detracting from the weight that can be given these two sales. The six remaining sales in the record sold for prices ranging from \$515,000 to \$1,305,000 or from \$177.40 to \$417.97 per square foot of living area, including land, which is a sizable range with no explanation for this diversity. The comparable most similar to the subject in features having an unfinished basement, no central air conditioning, and one fireplace sold in July 2022 for a price of \$562,500 or \$222.86 per square foot of living area, including land. The subject's assessment reflects a market value of \$836,331 or \$281.21 per square foot of living area, including land, which is above the overall price of four of the six remaining comparables in the record, and above the per square foot price of three of the six remaining comparables in the record prior to consideration of the downward adjustments to the comparables to make them more equivalent to the subject property. Furthermore, the subject's assessment reflects a market value significantly above the total price and per square foot price of the overall best comparable in the record. Based on this evidence, after considering the negative or downward adjustments to the comparables to make them more equivalent to the subject, the Board finds a reduction in the subject's assessment is appropriate.

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

Patrick Rice, 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