



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

APPELLANT: Larry Bower
DOCKET NO.: 23-01933.001-R-1
PARCEL NO.: 16-15-410-005

The parties of record before the Property Tax Appeal Board are Larry Bower, 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 **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: \$34,513
IMPR.: \$90,202
TOTAL: \$124,715

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 2,240 square feet of living area. The dwelling was constructed in 1923, is approximately 100 years old, and has an effective age of 1973. Features of the home include an unfinished basement, central air conditioning, and a 672 square foot garage. The property has an approximately 8,545 square foot site and is located in Highwood, Moraine Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on nine equity comparables located in the same assessment neighborhood as the subject property and within 0.56 of mile from the subject. The properties are improved with 2-story dwellings ranging in size from 2,128 to 2,544 square feet of living area. The homes are from 26 to 104 years old.

The comparables each have a basement, one of which has finished area. Six comparables each have central air conditioning, one comparable has one fireplace, and five comparables each have a garage that ranges in size from 324 to 480 square feet of building area. The comparables have improvement assessments ranging from \$84,210 to \$101,744 or from \$33.96 to \$43.53 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$78,982 or \$35.26 square feet of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$124,715. The subject property has an improvement assessment of \$90,202 or \$40.27 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on three equity comparables located in the same assessment neighborhood code as the subject property and within 0.21 of a mile from the subject. The properties are improved with 1.5-story, 1.75-story, or 2-story dwellings of brick, stucco, or wood siding exterior construction ranging in size from 1,816 to 2,055 square feet of living area. The homes are from 93 to 98 years old. Each comparable has an unfinished basement and a garage that ranges in size from 440 to 744 square feet of building area. Two comparables each have central air conditioning. The comparables have improvement assessments ranging from \$80,079 to \$86,961 or from \$42.32 to \$44.10 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 twelve equity comparables submitted by the parties to support their respective positions. The Board gives less weight to the appellant's comparables #1 through #4 and #6 through #9 as well as board of review comparable #1 which are less similar in age or dwelling size than other comparables in this record. Additionally, these comparables present other differences from the subject in basement finish, fireplace count, and/or garage amenity.

The Board finds the best evidence of assessment equity to be the appellant's comparable #5 as well as board of review's comparables #2 and #3 which are overall most similar to the subject in location, age, dwelling size, and most features. These comparables have improvement assessments ranging from \$86,594 to \$87,433 or from \$35.26 to \$43.08 per square foot of living area. The subject's improvement assessment of \$90,202 or \$40.27 per square foot of living area falls above the range established by the best comparables in this record on an overall basis but within on a per square foot basis. The subject's higher overall improvement assessment is logical considering its larger size when compared to the best comparables and its 1973 effective age which is 50 years newer than its chronological age. Based on this record, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed 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: _____

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

Larry Bower, 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