



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

APPELLANT: Daniel Gandor  
DOCKET NO.: 23-01965.001-R-1  
PARCEL NO.: 14-08-404-001

The parties of record before the Property Tax Appeal Board are Daniel Gandor, 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:** \$45,202  
**IMPR.:** \$197,361  
**TOTAL:** \$242,563

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 with frame exterior construction with approximately 4,073 square feet of living area.<sup>1</sup> The dwelling was constructed in 2016 and is approximately 7 years old. Features of the home include a full basement that is 80% finished,<sup>2</sup> 4½ bathrooms, central air conditioning, a fireplace and a three-car garage containing 842 square feet of building area. The property has an approximately 15,162 square foot site and is located in Lake Zurich, Ela Township, Lake County.

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<sup>1</sup> In the appraisal addendum, the appraiser reported on-site measurement of the dwelling concluding “about 4,200 square feet” of gross living area and acknowledged the assessor’s records of 4,073 square feet stating, in pertinent part, “this number was consistent with assessor’s records” and “the difference was literally nominal, but anyhow, appraiser’s number was used in this appraisal.” Given the record evidence, the Board finds the dwelling size determined by the assessor is the best evidence herein.

<sup>2</sup> While the appellant’s appraiser reported an 80% finished basement supported with photographs, the assessing officials do not report finished basement area on the subject’s property record card.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared by Genadi Dvorkin, a Certified General Real Estate Appraiser, for purposes of a mortgage refinance transaction. The client was Home Point Financial Corporation with the intended use for the lender/client to evaluate the property for a mortgage finance transaction and the intended user was the lender/client. Using the sales comparison approach to value, Dvorkin estimated the subject property had a fee simple market value of \$685,000 as of June 4, 2021.

As to the subject dwelling, Dvorkin estimated the effective age of the subject to be 5 years old for the opinion of value in 2021. The appraiser reported updated kitchen cabinets and bathrooms within one to five years ago. Dvorkin specified that the subject was “a newer house as of the date of valuation.”

Under the sales comparison approach, the appraiser analyzed five sales and one active listing of properties located from 0.10 of a mile to 1.87-miles from the subject property. The comparable parcels range in size from 11,496 to 18,674 square feet of land area which were each improved with traditional two-story dwelling. The homes were 3 to 22 years old. The comparables range in size from 3,600 to 4,268 square feet of living area. Each comparables has a basement, four of which have finished area. Features include 3½ to 4½ bathrooms, central air conditioning, and either a two-car or a three-car garage. Comparable sale #2 has an inground swimming pool. Five properties were sold or under contract (#5) from May 2020 to May 2021 for prices ranging from \$608,000 to \$724,900 or from \$152.16 to \$201.36 per square foot of living area, including land. The active listing identified as comparable #6 had an asking price of \$725,000 or \$178.05 per square foot of living area, including land.

As part of the appraisal, the appraiser set forth adjustments to comparables #5 and #6 for listing status and further made adjustments for location on a busy road, age for the 22 year old home, bathroom count and/or dwelling size, three properties were adjusted for finished basement, garage capacity, and the pool of comparable #2. Dvorkin stated the comparable #4 was the best sold property due to location in the subject’s subdivision/development given the limited number of available comparable sales. The appraiser then arrived at adjusted sales prices for the comparables ranging from \$650,000 to \$825,892, including land. In reconciliation, the appraiser gave greatest weight to comparable #4 in the subject’s subdivision with substantial weight given to comparables #1 and #3 as #1 required minimal adjustment and #3 was the most recent sale as of the valuation date. The “actives” #5 and #6 were “strongly considered, with comparable #2 given secondary consideration due to having the largest adjustments among the chosen properties. Based on this data and analysis using the sales comparison approach, the appraiser estimated the subject's market value to be \$685,000, including land.

Based on the foregoing evidence, the appellant requested a total reduced assessment of \$232,534 which would reflect a market value of approximately \$697,672 or \$171.29 per square foot of living area, including land, when using 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 \$242,563. The subject's assessment reflects a market value of

\$727,762 or \$178.68 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>3</sup>

In support of its contention of the correct assessment, the board of review submitted the electronic grid analysis with seven comparable sales located in the same neighborhood code assigned to the subject and within .67 of a mile from the subject. The parcels range in size from 14,989 to 20,359 square feet of land area and are each improved with a two-story dwelling of brick or brick with frame exterior construction. The dwellings were built from 2000 to 2023 and thus are from new construction to 23 years old. The homes range in size from 3,900 to 4,306 square feet of living area. Each dwelling has an unfinished basement, from 4½ to 5½ bathrooms, central air conditioning, one or two fireplaces, and a garage ranging in size from 727 to 921 square feet of building area. The comparables sold from January 2022 to November 2023 for prices ranging from \$762,500 to \$1,100,000 or from \$194.76 to \$277.36 per square foot of living area, including land.

Based on this evidence, the board of review requested confirmation of the subject's estimated market value as reflected by its 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 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 appellant submitted an appraisal of the subject property prepared for mortgage refinance purposes with an opinion of market value as of June 4, 2021 for the Board's consideration and the board of review submitted seven suggested raw sales that sold in 2022 and 2023, dates more proximate to the lien date at issue herein of January 1, 2023. Therefore, the Board has given reduced weight to the appellant's appraisal evidence given the purpose of the appraisal, the dated nature of the sales used to arrive at a value opinion for purposes of this appeal and the dated opinion of value in June 2021 as compared to the lien date of this appeal. The Board has also given reduced weight to board of review sales #6 and #7, due dwelling ages of 18 and 23 years, respectively, as compared to the subject that is 7 years old.

The Board finds the best evidence of market value to be the board of review comparable sales #1 through #5 which are similar to the subject in location, design and dwelling size with varying degrees of similarity in age, bathroom count and/or garage size. The Board finds that four of the five best comparable sales in the record are newer dwellings when compared to the subject which would be expected to have less depreciation than the subject and potentially higher values.

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<sup>3</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 issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2023.

In contrast, the highest value property presented by the board of review is 9 years old with a July 2023 sale price of \$277.36 per square foot of living area, including land. The differences between the comparables and the subject like age, bathroom count and garage size necessitate various adjustments to the comparables to make them more equivalent to the subject property. These five board of review comparables sold for prices ranging from \$940,000 to \$1,100,000 or from \$218.30 to \$277.36 per square foot of living area, including land. The subject's assessment reflects a market value of \$727,762 or \$178.68 per square foot of living area, including land, which is significantly below the range established by the best comparable sales in the record both in terms of overall market value and on a per-square-foot of living area basis, including land.

Therefore, based on this evidence and after considering appropriate adjustments to the best comparable sales in the record presented by the board of review, the Property Tax Appeal 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

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