



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

APPELLANT: Edward Nathan  
DOCKET NO.: 23-01969.001-R-1  
PARCEL NO.: 15-24-109-021

The parties of record before the Property Tax Appeal Board are Edward Nathan, 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:** \$73,823  
**IMPR.:** \$76,829  
**TOTAL:** \$150,652

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 primarily one-story ranch-style dwelling with a 300 square foot finished attic portion used as a craft room. The dwelling has brick and vinyl siding exterior construction with approximately 2,700 square feet of living area.<sup>1</sup> The dwelling was constructed in 1961, making the dwelling 62 years old. Features of the home include a crawl-space foundation, 2 full bathrooms, central air conditioning, a fireplace and a 441 square foot garage. The property has a 23,087 square foot site and is located in Lincolnshire, Vernon Township, Lake County.

---

<sup>1</sup> The assessing officials report the subject to be a two-story dwelling with 2,730 square feet of living area supported by a schematic drawing, while the appellant's appraiser who inspected the home in August 2023 has interior photographs along with a schematic drawing depicting a dwelling size of 2,700 square feet. The Board finds based on comparing the drawings, the size difference in the conclusions is due to rounding by the assessing officials.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared by R. Steven Kephart, a Certified Residential Real Estate Appraiser, for purposes of estimating market value for a real estate tax appeal. Using the sales comparison approach to value, Kephart estimated the subject property had a fee simple market value of \$452,000 as of January 1, 2023.

As to the subject dwelling, Kephart estimated the effective age of the subject to be 25 years old based on ongoing repair and maintenance stating the property was well cared for. Kephart viewed the subject property on August 18, 2023. (Appraisal, pp. 1 & 4)

Under the sales comparison approach, the appraiser analyzed six sales of properties located from 0.38 to .95 of a mile from the subject property. All comparables have a residential location like the subject. The comparable parcels range in size from 5,000 to 76,037 square feet of land area which were improved with either a Ranch, Traditional or two-story Colonial dwelling of brick, brick and cedar, or brick and frame exterior construction. The homes were 38 to 52 years old. The comparables range in size from 2,560 to 2,866 square feet of living area. Five comparables have basements, four of which have finished area. Features include 2 or 2½ bathrooms, central air conditioning, one or two fireplaces, and a two-car garage. The comparables sold from February to September 2022 for prices ranging from \$405,000 to \$585,000 or from \$158.02 to \$204.12 per square foot of living area, including land.

As part of the appraisal, the appraiser set forth adjustments for concessions to comparable #6 and applied adjustments for bathroom count and/or dwelling size at \$40 per square foot, basement feature at \$50 per square foot and/or finished basement features. Functional utility adjustments were made as to bedroom count differences, number of fireplaces, and/or other outdoor amenity differences. In the addendum, the appraiser explained the weights afforded the six comparable sales ranging from 14.6% to 19.6%, acknowledging comparable #1 was the most similar due to no basement and given greatest weight in reconciliation. The addendum also reported that gross adjustments for the comparable sales range from 1.9% to 23.7%. The appraiser reported adjusted sales prices for the comparables ranging from \$412,500 to \$474,800, including land. Based on this data and analysis using the sales comparison approach, Kephart estimated the subject's market value as of January 1, 2023, to be \$452,000 or \$167.41 per square foot of living area, including land.

Based on the foregoing evidence, the appellant requested a total reduced assessment of \$149,797 which would reflect a market value of approximately \$425,434 or \$157.57 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 \$187,246. The subject's assessment reflects a market value of \$561,794 or \$208.07 per square foot of living area, land included, when applying a dwelling size of 2,700 square feet and using the statutory level of assessment of 33.33%.<sup>2</sup>

---

<sup>2</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 support of its contention of the correct assessment the board of review submitted information on five comparable sales, where comparable #3 is the same property as appraisal sale #5. Each comparable is located in the same assessment neighborhood code as the subject and all the comparables are from .16 to .65 of a mile from the subject. The parcels range in size from 17,860 to 20,473 square feet of land area and each is improvement with a two-story dwelling of brick and frame exterior construction. The homes range in age from 49 to 58 years old and range in size from 2,585 to 2,864 square feet of living area. Each comparable has a basement with finished area, 2½ bathrooms, central air conditioning, one or two fireplaces and a garage ranging in size from 462 to 529 square feet of building area. The comparables sold from May to November 2022 for prices ranging from \$550,000 to \$706,000 or from \$203.40 to \$263.93 per square foot of living area, including land.

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 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 appellant submitted an appraisal of the subject property prepared for property tax appeal purposes with an opinion of market value as of January 1, 2023 using sales from 2022 with adjustments for differences for the Board's consideration and the board of review submitted five suggested unadjusted raw sales of two-story dwellings, one of which was common with the appraisal report, that sold in 2022. The Board finds that each of the board of review comparables differ in both story height, foundation and/or basement finish when compared to the subject primarily ranch-style dwelling with a crawl-space foundation which have been given reduced weight in this analysis.

The Property Tax Appeal Board finds the best evidence of market value to be the appraisal submitted by the appellant. The appraiser presented credible adjustments to the comparable sales for differences when compared to the subject in bathroom count, dwelling size, basement foundation and/or finish, functional utility, fireplace count and/or other outdoor amenities when compared to the subject in arriving at an opinion of value of the subject of \$452,000. The subject's assessment reflects a market value of \$561,794 or \$208.07 per square foot of living area, including land, which is above the appraised value. The Board finds the subject property had a market value of \$452,000 as of the assessment date at issue. Since market value has been established the statutory level of assessment of 33.33% shall apply. (See Footnote 2 and 86 Ill.Admin.Code §1910.50(c)(1)).

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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Edward Nathan, 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