



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

APPELLANT: Chad Goodall
DOCKET NO.: 23-02098.001-R-1
PARCEL NO.: 16-11-102-016

The parties of record before the Property Tax Appeal Board are Chad Goodall, the appellant, by attorney Dimitrios Trivizas, of Dimitrios P. Trivizas, Ltd. in Skokie; 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: \$70,259
IMPR.: \$404,346
TOTAL: \$474,605

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 three-story dwelling of brick exterior construction with 7,943 square feet of living area. The dwelling is approximately 131 years old, with an effective age of 1995. Features of the home include a basement with finished area, central air conditioning, three fireplaces, and a 500 square foot garage. The property has a 18,731 square foot site and is 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 an appraisal estimating the subject property had a market value of \$1,200,000 as of January 1, 2023. The appraisal was prepared by Peter Soukoulis a certified residential real estate appraiser, for "Appeal of Ad Valorem Assessment."

Under the sales comparison approach, the appraiser selected three comparable sales located within 0.30 of a mile from the subject property. The parcels range in size from 13,068 to 18,295 square feet of land area and are improved with three-story dwellings of brick exterior construction ranging in size from 4,895 to 5,418 square feet of living area. The dwellings are approximately 131 years old. Each comparable has a partially finished basement, central air conditioning, and a two to a four-car garage. The comparables sold in December 2021 and May 2022 for prices ranging from \$925,000 to \$1,200,000 or from \$170.73 to \$242.08 per square foot of living area, including land. The appraiser adjusted the comparables for sales or financing considerations and differences from the subject such as gross living area, garage size, and modernization to arrive at adjusted sales prices ranging from \$1,022,900 to \$1,245,900. Based on this analysis, the appraiser concluded a value of \$1,200,000 for the subject as of January 1, 2023.

Based on this evidence, the appellant requested a reduction in the subject's total assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$474,605. The subject's assessment reflects a market value of \$1,423,957 or \$179.27 per square foot of living area, land included, when applying the statutory level of assessments of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with two-story or three-story dwellings of brick exterior construction that range in size from 5,171 to 6,168 square feet of living area. The board of review's comparable #2 is the same property as appraisal sale #1. The homes are from 128 to 133 years old and have sites ranging in size from 13,068 to 25,265 square feet of land area. Each comparable has central air conditioning, one to five fireplaces, and a garage ranging in size from 651 to 1,141 square feet of building area. Three of the comparables also have a basement with two having finished area. The comparables have the same assessment neighborhood code as the subject and are located within 0.24 of a mile from the subject property. The sales occurred from April 2021 to April 2023 for prices ranging from \$1,200,000 to \$1,899,000 or from \$218.88 to \$307.88 per square foot of living area, including land.

In response to the appellant's appraisal report, the board of review noted the appraisal report estimated a per square foot value for the subject that falls below the per square foot sales prices contained within the appraisal report nor was there any commentary within the report explaining the conclusion. In addition, the board of review argued that two of the sales contained in the appraisal have sites that are 30% and 16% smaller than the subject site, while one other comparable is located further away from Lake Michigan when compared to the subject dwelling, which was illustrated by a map provided by the board of review. The board of review requested the subject's total assessment be confirmed.

¹ Section 1910.50(c)(1) of the Board's procedural rules 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 Section 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for the tax year 2023.

In rebuttal, the appellant provided a letter from the appraiser, Peter Soukoulis, who addressed some of the board of review criticisms of the lack of site adjustments within his report and noted the board of review's comparable #1 was located directly on the lake, had lake front views in many of the rooms, and had expansive remodeling. The appellant's rebuttal also included a letter from its legal counsel arguing the board of review failed to provide any adjustments to its comparables to account for differences from the subject property, utilized a comparable sale – board of review comparable #1 – that sold four months after the January 1, 2023, date of assessment, and failed to provide any evidence or data to substantiate its claim there should be adjustments or an accounting for the difference in the value of the sites within the appraisal report.

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.

In support of their respective arguments, the appellant presented an appraisal and the board of review offered four comparable sales for the Board's consideration, one of which is also contained in the appraisal report. Due to the size and significance of the adjustments contained in the appraisal report to account for differences in dwelling size and condition/modernization, the Board gives less weight to the appraisal's overall estimate of value. Therefore, the Board finds that an analysis of both parties' unadjusted sales comparables is more appropriate. The Board also gives less weight to the board of review's comparables #3 and #4 because the sales were less proximate in time to the subject's January 1, 2023, assessment date when compared to the other sales contained in the record. The Board finds the best evidence of market value to be the appraisal report's comparables, as well as the board of review's comparables #1 and #2, including the common sale.

These comparable sales, which are relatively similar to the subject with respect to age, location, lot size, dwelling size, and have similar features when compared to the subject, although adjustments to these comparables to account for differences in some features, would be needed to make them more equivalent to the subject. These comparables are either 131 or 133 years old, range in size from 4,895 to 6,168 square feet of living area and are located within 0.30 of a mile from the subject dwelling. The sales occurred from November 2021 to April 2023 for prices ranging from \$925,000 to \$1,899,000 or from \$170.73 to \$307.88 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,423,957 or \$179.27 per square foot of living area, land included, which falls within the range as established by the best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds that 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

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

APPELLANT

Chad Goodall, by attorney:
Dimitrios Trivizas
Dimitrios P. Trivizas, Ltd.
4957 Oakton Street
No. 217
Skokie, IL 60077

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085