



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

APPELLANT: H S & UMADEVI JAYASWAMY
DOCKET NO.: 23-02119.001-R-1
PARCEL NO.: 16-10-101-023

The parties of record before the Property Tax Appeal Board are H S & UMADEVI JAYASWAMY, the appellants; 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: \$91,263
IMPR.: \$145,800
TOTAL: \$237,063

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 tri-level dwelling of frame and brick construction with 2,700 square feet of living area. The dwelling is 58 years old. Features of the home include a basement, that has finished area, central air conditioning, a fireplace, and a 630 square foot garage.¹ The property has a 37,700 square foot site and is located in Lake Forest, Moraine Township, Lake County.

The appellants contend overvaluation and assessment inequity with respect to the subject's improvement as the bases of the appeal. In support of these arguments the appellants submitted information on seven comparable properties located from .19 of a mile to 1.2 miles from the subject. The comparables have sites ranging in size from 12,750 to 37,750 square feet of land area that are improved with 1.5-story, tri-level dwellings of wood siding, brick or brick and wood

¹ The Board finds the subject has finished basement area and a 630 square foot garage based on the board of review's evidence, which was not refuted by the appellant.

siding construction ranging in size from 2,360 to 2,902 square feet of living area. The dwellings range in age from 47 to 65 years old. The comparables were reported to have unfinished basements, central air conditioning, one or two fireplaces, and garages ranging in size from 500 to 780 square feet of building area. Three of the comparables sold from May 2019 to November 2021 for prices ranging from \$459,000 to \$685,000 or from \$158.17 to \$269.47 per square foot of living area, including land. The comparables have improvement assessments ranging from \$89,812 to \$127,763 or from \$38.06 to \$52.38 per square foot of living area.

Based on this evidence the appellants requested the subject's total assessment be reduced to \$196,015 and the subject's improvement assessment be reduced to \$104,752.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$237,063. The subject's assessment reflects a market value of \$713,401 or \$264.22 per square foot of living area, land included, when using the 2023 three-year average median level of assessment for Lake County of 33.23% as determined by the Illinois Department of Revenue. The subject property has an improvement assessment of \$145,800 or \$54.00 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparable properties located from .30 of a mile to 1.03 miles from the subject. The comparables have sites ranging in size from 12,750 to 22,950 square feet of land area that are improved with 1-story dwellings of wood siding or brick construction ranging in size from 2,439 to 2,800 square feet of living area. The dwellings range in age from 45 to 71 years old. Three of the comparables were reported to have finished basements. The comparables have central air conditioning, from one to three fireplaces, and garages ranging in size from 460 to 576 square feet of building area. One of the comparables sold in April 2023 for a price of \$920,000 or \$377.20 per square foot of living area, including land. The comparables have improvement assessments ranging from \$127,763 to \$185,886 or from \$52.38 to \$66.39 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 appellants contend in part 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of four comparable sales for the Board's consideration, of which only the board of review's sale occurred within a year of the January 1, 2023 assessment date at issue. Nevertheless, the comparables sold from May 2019 to April 2023 for prices ranging from \$459,000 to \$920,000 or from \$158.17 to \$377.20 per square foot of living area, including land. The subject's assessment reflects a market value of \$713,401 or \$264.22 per square foot of living area, including land, which falls within the range established by the comparable sales in this

record. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. Based on this evidence the Board finds a reduction in the subject's assessment is not warranted on the grounds of overvaluation.

The appellants also contend improvement assessment inequity as an alternative 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted based on assessment inequity.

The Board finds the best evidence of assessment equity to be the appellants' comparables #1, #3 through #7, as well as the board of review's comparables. These comparables have varying degrees of similarity to the subject and have improvement assessments ranging from \$109,492 to \$185,886 or from \$38.75 to \$66.39 per square foot of living area. The subject's improvement assessment of \$145,800 or \$54.00 per square foot of living area falls within the range established by the best comparables in this record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is supported. The Board gave less weight to the appellants' comparable #2, due to its smaller dwelling size when compared to the subject. Based on this record the Board finds the appellants 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 on the grounds of assessment inequity.

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: _____

May 20, 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

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