FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Robert Johnson
DOCKET NO.: 23-02234.001-R-1 through 23-02234.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Robert Johnson, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
23-02234.001-R-1	12-28-110-031	81,736	60,588	$142, 324
23-02234.002-R-1	12-28-110-032	67,657	0	$67,657

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 two parcels improved with a 1-story dwelling of wood siding exterior construction with 2,083 square feet of living area. The dwelling was built in 1920 and is approximately 103 years old. Features of the home include an unfinished basement, one fireplace, and a garage with 360 square feet of building area. The property has a combined 15,832 square foot site and is located in Lake Forest, Shields Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales that are located in the subject's assessment neighborhood and from 0.33 of a mile to 1.56 miles from the subject. The comparables have sites that range in size from approximately 10,328 to 14,972 square feet of land area. The comparables are improved with 1-story dwellings ranging in size from 1,840 to 2,349 per square feet of living area. The homes are from 60 to 77 years old. Each comparable has an unfinished basement, one fireplace, and a garage that ranges in size from 352 to 696 square feet of building area. Two comparables each have central air conditioning. The properties sold from February 2022 to March 2023 for prices ranging from $440,000 to $570,000 or from $187.31 to $309.78 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to $209,981, which reflects a market value of $630,006 or $302.45 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The appellant's submission included a copy of the two "Notice of Findings by the Lake County Board of Review" dated November 16, 2023 which disclosed the subject has a total assessment for the two parcels of $223,142 and would reflect an estimated market value of $669,493 or $321.41 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.[1]

The board of review submitted its "Board of Review Notes on Appeal" for only one of the parcels under appeal. Nevertheless, in support of its contention of the correct assessment, the board of review submitted information on three comparable sales with the same assessment neighborhood code as the subject. Board of review comparables #1 and #3 are the same properties as the appellant's comparables #2 and #3, respectively. The comparables have sites that range in size from 10,330 to 19,990. The parcels are improved with 1-story dwellings of brick or wood siding exterior construction ranging in size from 1,840 to 2,147 square feet of living area. The homes are from 65 to 76 years old. The comparables each have a basement, one of which has finished area. Each comparable has central air conditioning, one fireplace, and a garage that ranges in size from 273 to 440 square feet of living area. The properties sold in either February 2022 or February 2023 for prices ranging from $470,000 to $750,000 or from $242.89 to $349.32 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 parties submitted four comparable sales for the Board's consideration, two of which are shared by the parties. Each of these comparables is a significantly newer home than the subject. Nevertheless, the Board gives less weight to board of review comparable #2 which has basement finish, which is a feature the subject lacks.

[1] 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 drafting of this decision, the Department of Revenue has not published figures for tax year 2023.

The Board finds the best evidence of assessment equity to be the parties' three remaining comparable sales, including the two common sales. These comparables sold proximate in time to the subject's assessment date and similar to the subject in location, dwelling size, and most issues. The comparables sold for prices ranging from $440,000 to $570,000 or from $187.31 to $309.78 per square foot of living area, land included. The subject's assessment reflects a market value of $669,493 or $321.41 per square foot of living area, land included, which falls above the range established by the best comparables sales in this record and is excessive. Therefore, based on the market value evidence in this record and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment based on overvaluation, commensurate with the appellant's request, is 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:

C E R T I F I C A T I O N

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

Robert Johnson, 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