



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

APPELLANT: Christopher Dignam
DOCKET NO.: 23-02287.001-R-1
PARCEL NO.: 15-36-400-006

The parties of record before the Property Tax Appeal Board are Christopher Dignam, the appellant, by attorney Timothy C. Jacobs, of Kovitz Shifrin Nesbit in Mundelein; 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: \$107,842
IMPR.: \$82,921
TOTAL: \$190,763

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 1-story dwelling of frame exterior construction with 2,149 square feet of living area. The dwelling was built in 2000. Features of the home include a concrete slab foundation, one fireplace, 2.0 bathrooms, and an 876 square foot garage. The property has an approximately 108,900 square foot site and is located in Riverwoods, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on five comparable sales located from 0.57 of a mile to 2.20 miles from the subject, each of which has the subject's assessment neighborhood code. The comparables have sites that range in size from approximately 44,524 to 71,148 square feet of land area. The comparables are improved with 1-story dwellings of brick or frame exterior construction ranging in size from 2,045 to 2,852 square feet of living area. The homes were built

from 1954 to 1989 with effective ages ranging from 1961 to 1989. Four 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 460 to 912 square feet of building area. The homes have from 2.0 to 3.0 bathrooms. The properties sold from February 2022 to May 2023 for prices ranging from \$410,000 to \$665,000 or from \$174.18 to \$233.17 per square foot of living area, land included.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$190,763. The subject's assessment reflects a market value of \$572,346 or \$266.33 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.¹

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located from 0.85 of a mile to 1.15 miles from the subject, each of which has the subject's assessment neighborhood code. The comparables have sites that range in size from 41,024 to 72,310 square feet of land area. The comparables are improved with 1-story dwellings of brick or frame exterior construction ranging in size from 2,049 to 2,110 square feet of living area. The homes were built from 1955 to 1971. Two comparables each have a basement, one of which has finished area. Each comparable has central air conditioning, either one or two fireplaces, either 2.5 or 3.0 bathrooms, and a garage with either 572 or 728 square feet of building area. The properties sold from January to October 2022 for prices ranging from \$558,000 to \$795,000 or from \$266.22 to \$387.99 per square foot of living area, land included. 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains eight comparable sales for the Board's consideration. The Board finds each of the parties' comparables is a significantly older home than the subject with varying degrees of similarity in location, dwelling size, and other features. Nevertheless, the Board gives less weight to the appellant's comparables #1, #2, #4, and #5 as well as board of review comparables which each lack a basement foundation, with the appellant's comparables #1 and #5 also being significantly larger homes than the subject.

The Board finds the best evidence of market value to be the appellant's comparable #3 and board of review comparable #1. These comparables sold proximate in time to the subject's January 1,

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.

2023 assessment date and are similar to the subject in dwelling size and most features. However, the two best comparables would still require adjustments for differences from the subject, including but not limited to, location, lot sizes, age, and central air conditioning amenity. These two properties sold for prices of \$425,000 and \$650,000 or \$174.18 and \$308.06 per square foot of living area, land included, respectively. The subject's assessment reflects an estimated market value of \$572,346 or \$266.33 per square foot of living area, land included, which is bracketed by the two best comparable sales in this record. Based on this record and after considering adjustments to the two best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported and a reduction in the subject's assessment is not warranted.

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: _____

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

Christopher Dignam, by attorney:
Timothy C. Jacobs
Kovitz Shifrin Nesbit
175 North Archer Avenue
Mundelein, IL 60060

COUNTY

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