



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

APPELLANT: Venkatesan Manikanda
DOCKET NO.: 23-02388.001-R-1
PARCEL NO.: 14-09-104-017

The parties of record before the Property Tax Appeal Board are Venkatesan Manikanda, the appellant, by attorney Anthony DeFrenza of the Law Office of DeFrenza & Mosconi PC in Northbrook; 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: \$53,037
IMPR.: \$219,641
TOTAL: \$272,678

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 two-story dwelling of brick exterior construction with 4,294 square feet of living area. The dwelling was constructed in 2000. Features of the home include a basement, central air conditioning, two fireplaces and a 729 square foot garage. The property has an approximately 42,892¹ square foot site and is located in Hawthorn Woods, Ela Township, Lake County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on September 10, 2020 for a price of \$685,000. To document the sale the appellant provided a copy of the Warranty Deed, closing disclosure statement, a listing history printout, the Multiple Listing Service (MLS)

¹ The Board finds the best description of the subject's site size is found in the subject's property record card provided by the board of review.

datasheet and the settlement statement. The settlement statement reiterated the date of sale and purchase price and disclosed commissions were paid to one realty agency. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$272,678. The subject's assessment reflects a market value of \$818,116 or \$190.53 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In support of its contention of the correct assessment the board of review submitted information on five comparable properties that have the same assessment neighborhood code as the subject and are located within .27 of a mile from the subject property. The comparables have sites that range in size from 41,084 to 58,806 square feet of land area. The comparables are improved with two-story dwellings of frame or frame and brick exterior construction ranging in size from 3,649 to 4,176 square feet of living area. The comparables were built from 1989 to 2007. Each comparable has a basement, central air conditioning, one to three fireplaces and a garage ranging in size from 782 to 1,067³ square feet of building area. The comparables sold from January 2022 to May 2023 for prices ranging from \$775,000 to \$1,000,000 or from \$210.83 to \$239.46 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant provided evidence regarding the sale of the subject property and the board of review submitted five comparable sales for the Board's consideration.

The Board has given little weight to the sale price of the subject property due to the fact the sale occurred in September 2020, approximately 27 months prior to the lien date at issue and is thus less likely to be indicative of the subject's market value as of the January 1, 2023 assessment date.

² 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 yet to publish figures for tax year 2023.

³ The Board finds the best description of the garage size for board of review comparable #2 is found in the schematic diagram of the improvements provided by the board of review. The diagram contained dimensions of the garage and indicated the garage contained 1,067 square feet of building area, whereas the board of review's grid analysis erroneously stated a garage size of 2,131 square feet of building area.

The Board finds the best evidence of market value in the record to be board of review comparable sales #1, #2 and #4, which have sale dates that occurred more proximate in time to the assessment date at issue and these comparables are similar to the subject in location, dwelling size, design, age and some features. The comparables sold from January 2022 to May 2023 for prices ranging from \$840,000 to \$1,000,000 or from \$211.79 to \$239.46 per square foot of living area, including land. The subject's assessment reflects a market value of \$818,116 or \$190.53 per square foot of living area, including land, which falls below the range established by the best comparable sales in the record. The Board has given less weight to the board of review's comparables #3 and #5 which are less similar to the subject in age and dwelling size. Based on 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 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: _____

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

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