



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

APPELLANT: Anandaraju Setty
DOCKET NO.: 23-02975.001-R-1
PARCEL NO.: 11-32-216-004

The parties of record before the Property Tax Appeal Board are Anandaraju Setty, the appellant; 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: \$41,073
IMPR.: \$177,757
TOTAL: \$218,830

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 parties appeared before the Property Tax Appeal Board on March 25, 2025 for a hearing at the Lake County Board of Review Office in Waukegan pursuant to prior written notice dated January 30, 2025. Appearing was Anandaraju Setty, the appellant, and on behalf of the Lake County Board of Review was Jack Perry, Mass Appraisal Specialist.

The subject property consists of a 2-story dwelling of brick and frame exterior construction with 3,701 square feet of living area. The dwelling was constructed in 1997 and is approximately 26 years old. Features of the home include a basement, central air conditioning, two fireplaces and a 630 square foot garage. The property has an approximately 9,900 square foot site and is located in Vernon Hills, Libertyville 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 located within 0.35 of a mile from the

subject property. The comparables have sites that range in size from 9,297 to 12,211 square feet of land area and are improved with 2-story dwellings of brick and frame exterior construction ranging in size from 3,214 to 3,666 square feet of living area. The dwellings were built in 1997 or 1999. Each comparable has a basement, central air conditioning, one or two fireplaces and either a 440 or 649 square foot garage. The properties sold from September to December 2020 for prices ranging from \$495,000 to \$610,000 or from \$152.35 to \$166.39 per square foot of living area, land included.

Mr. Setty testified the subject property backs up to functioning railroad tracks and has a busy street view. Mr. Setty indicated none of his comparable sales have a similar railroad track location, arguing that despite having “premium locations” these properties sold for less than the subject’s market value based on its assessment. Mr. Setty testified the comparable sales submitted at for his appeal before the board of review were located proximate to a railroad track. The appellant expressed frustration these comparable properties were not part of the evidence used by the Property Tax Appeal Board. Based on this evidence, the appellant requested the subject’s total assessment be reduced to \$195,385 which reflects a market value of \$586,214 or \$158.39 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$218,830. The subject's assessment reflects a market value of \$658,531 or \$177.93 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.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located within 0.32 of a mile from the subject property. The comparables have sites that range in size from 9,900 to 11,708 square feet of land area and are improved with 2-story dwellings of brick exterior construction ranging in size from 3,333 to 3,715 square feet of living area that are 24 or 25 years old. Each comparable has a basement, central air conditioning and a 630 or 649 square foot garage. Three dwellings each have one fireplace. The properties sold from April 2022 to December 2023 for prices ranging from \$716,000 to \$900,000 or from \$193.81 to \$253.52 per square foot of living area, land included.

Mr. Perry disclosed that board of review comparable #2 is located 12 houses from the subject, on the same street and with the same railroad track and street influences as the subject property. Mr. Perry testified he believed this comparable was the best board of review comparable and argued board of review comparables #2 and #4 are also good comparables. As to the board of review’s comparable #1, Mr. Perry asserted this comparable should be given little weight as it appeared to be an outlier. Based on this evidence, the board of review requested the subject’s assessment be confirmed.

In written rebuttal and oral testimony, Mr. Setty argued the board of review should not be able to submit comparable properties that sold after the January 1, 2023 assessment date. Mr. Setty testified it was his understanding that only sales from 2020 to 2022 were to be considered valid for a January 1, 2023 assessment complaint. Mr. Setty asserted board of review comparables #1 and #4 are homes located on “super premium lots” which are not comparable to the subject’s

location proximate to a railroad track. Mr. Setty also questioned why his five comparable properties submitted for his hearing before the board of review were not addressed by Property Tax Appeal Board.

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.

As to the evidence submitted by the appellant for his appeal before the board of review, Section 16-180 of the Property Tax Code provides that proceedings before the Property Tax Appeal Board are considered de novo (35 ILCS 200/16-180) or without reference to the actions taken before the board of review. Additionally, Section 1910.50(a) of the rules of the Property Tax Appeal Board provides in part that proceedings before the Property Tax Appeal Board are de novo "meaning the Board will only consider the evidence, exhibits and briefs submitted to it, and will not give any weight or consideration to any prior actions by a local board of review." (86 Ill.Admin.Code §1910.50(a)).

The parties submitted seven comparable sales for the Board's consideration. The Board gives less weight to each of the appellant's comparables which sold in 2020, more than two years prior to the January 1, 2023 assessment date than other properties in the record. The Board gives less weight to board of review comparable #1 which, based on its sale price appears to be an outlier. The Board also gives less weight to board of review comparable #4 which is less similar to the subject in dwelling size than other properties in the record.

The Board finds the best evidence of market value to be board of review comparables #2 and #3 which are more similar to the subject in age, design, dwelling size and other features. However, one of these two comparables lacks a railroad track location suggesting a downward adjustment is needed to make this property more equivalent to the subject. These two comparables sold in April and June 2022 for prices of \$716,000 and \$720,000 or \$193.81 and \$194.78 per square foot of living area, including land. The subject's assessment reflects a market value of \$658,531 or \$177.93 per square foot of living area, including land, which falls below the two best comparable sales in this record. After considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is justified 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: _____

April 15, 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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