



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

APPELLANT: Adam Rayne
DOCKET NO.: 23-04527.001-R-1
PARCEL NO.: 20-31-276-011

The parties of record before the Property Tax Appeal Board are Adam Rayne, the appellant, by attorney Andrew J. Rukavina of The Tax Appeal Company in Mundelein; and the McHenry 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 **McHenry** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$87,785
IMPR.: \$233,258
TOTAL: \$321,043

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the McHenry 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 part 2-story and part 1-story dwelling of brick exterior construction with 4,706 square feet of living area.¹ The dwelling was constructed in 1964 and is approximately 59 years old. Features of the home include a partially exposed basement with finished area, central air conditioning, four full bathrooms, two half bathrooms, five fireplaces, a 528 square foot attached garage and a 955 square foot detached garage that has a second floor with 703 square feet of building area. The property also has an inground swimming pool, a 526 square foot cabana and a 560 square foot barn. The property has a 307,258 square foot site and is located in Barrington Hills, Algonquin Township, McHenry County.

¹ The Board finds the best description of the subject is found in the property record card provided by the board of review that contained an exterior photograph and a schematic diagram with dimensions of the improvements, which was not refuted by the appellant.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable properties. The appellant did not provide the assessment neighborhood codes or the proximity of the comparables in relation to the subject. The appellant reported the comparables have sites that range in size from 185,728 to 525,299 square feet of land area. The comparables are improved with 2-story dwellings of frame exterior construction ranging in size from 5,121 to 5,198 square feet of living area. The dwellings were built from 1837 to 1930. Each comparable has an unfinished basement, central air conditioning, three or four full bathrooms, one half bathroom, two fireplaces and a garage ranging in size from 900 to 1,116 square feet of building area. The appellant reported the comparables sold from March 2022 to January 2023 for prices ranging from \$660,000 to \$940,000 or from \$127.76 to \$180.84 per square foot of living area, including land.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$258,989, which would reflect a market value of \$777,045 or \$165.12 per square foot of living area, including land, when using 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 \$321,043. The subject's assessment reflects a market value of \$963,225 or \$204.68 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In response to the appeal, the board of review argued that the appellant's comparables #1 and #2 have no recent recorded sales. Additionally, the appellant's comparable #3 was transferred by a "Special Warranty Deed" with an actual sale date of April 7, 2021 for a price of \$599,900.

The board of review also submitted evidence prepared by the township assessor, which included a letter and PTAB's grid analysis with information on four comparable properties, along with a map depicting the locations of the comparables in relation to the subject. The assessor also noted that the township found no valid sales for the appellant's comparables #1 and #2, while the appellant's sale #3 was a foreclosure sale. In support of these claims the assessor provided a copy of the property record card for the appellant's comparable #1 depicting a transfer of this property via a deed in trust on March 18, 2024 with a consideration of \$10.00; a copy of the property record card for the appellant's comparable #2 depicting a transfer of this property via a "Special Warranty Deed" on January 9, 2018 sale for a price of \$350,000; and a copy of the PTAX-203 Illinois Real Estate Transfer Declaration for the appellant's comparable #3 depicting a sale date of April 7, 2021 for a price of \$599,900.

In support of its contention of the correct assessment, the board of review submitted information on four comparable properties that have the same assessment neighborhood code as the subject and are located from .11 to 1.61 miles from the subject property. Board of review comparable #3 is reportedly a farm parcel (farmland with buildings). The board of review's evidence included an additional grid analysis of these same four comparables that was prepared by the township

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.

assessor. The comparables have sites that range in size from 194,011 to 229,275 square feet of land area. The comparables are improved with 2-story or 2.5-story dwellings of brick or frame and brick exterior construction ranging in size from 3,982 to 6,826 square feet of living area. The dwellings were built from 1985 to 2013 and are from 10 to 38 years old. The comparables each have a basement, two of which are walk-outs and three have finished area. Each comparable has central air conditioning, from three to six full bathrooms, one or two half bathrooms and a garage ranging in size from 498 to 1,375 square feet of building area. Three comparables each have from one to five fireplaces. Comparable #2 has a 2,183 square foot horse stable, comparable #3 has a 579 square foot barn and comparable #4 has an inground swimming pool. The comparables sold from March to September 2022 for prices ranging from \$700,000 to \$1,900,000 or from \$175.79 to \$278.35 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 record contains seven comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables due to their lack of basement finish and/or less similar dwelling ages, when compared to the subject. The Board also finds the record revealed the assessing officials found no sales data for the appellant's comparables #1 and #2, which was not refuted by the appellant and the 2021 sale of the appellant's comparable #3 reported by the board of review occurred less proximate in time to the January 1, 2023 assessment date than the other comparable sales in the record. The Board has given reduced weight to board of review comparable #2 due to its significantly larger dwelling size, when compared to the subject and to board of review comparable #3 which is a farm parcel containing farmland with buildings, unlike the subject.

The Board finds the best evidence of market value to be board of review comparables #1 and #4, which have the same assessment neighborhood code as the subject and are relatively similar to the subject in dwelling size, although comparable #4 is located more than one mile away from the subject. However, the Board finds each comparable is inferior to the subject in site size and each comparable lacks an additional garage, barn, cabana and/or inground swimming pool, all features of the subject, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Conversely, both dwellings are either 21 or 32 years newer in age when compared to the subject, suggesting downward adjustments would be necessary. Additionally, each comparable also has other property characteristics that have varying degrees of similarity when compared to the subject, necessitating additional adjustments. Nevertheless, the comparables sold in March and August 2022 for prices of \$700,000 and \$940,000 or for \$175.79 and \$177.43 per square foot of living area, including land. The subject's assessment reflects a market value of \$963,225 or \$204.68 per square foot of living area,

including land, which is greater than the two best comparable sales in the record but appears to be logical given the subject's substantially larger site size and superior features that include an additional garage, barn, cabana and/or inground swimming pool. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is supported. Therefore, based on this record, 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: _____

January 21, 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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