

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Debra Minard DOCKET NO.: 24-00620.001-R-1 PARCEL NO.: 10-25-310-037

The parties of record before the Property Tax Appeal Board are Debra Minard, 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: \$26,393 **IMPR.:** \$161,923 **TOTAL:** \$188,316

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 2024 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 2-story dwelling of vinyl siding exterior construction with 3,197 square feet of living area. The dwelling was constructed in 2016 and is approximately 8 years old. Features of the home include a walkout basement, central air conditioning, a fireplace, and a 627 square foot garage. The property has an approximately 8,210 square foot site and is located in Mundelein, Fremont Township, Lake County.

The appellant contends both overvaluation and assessment inequity as the bases of the appeal. In support of these arguments, the appellant submitted information on five comparables located from 0.11 of a mile to 1.16 miles from the subject, one of which is within the same assessment neighborhood code as the subject. The parcels range in size from 7,800 to 8,050 square feet of land area and are improved with 2-story homes of vinyl siding exterior construction ranging in size from 2,961 to 3,435 square feet of living area. The homes range in age from 5 to 18 years old. Each dwelling has a basement, central air conditioning, and a garage ranging in size from

571 to 664 square feet of building area. Four homes have a fireplace. The comparables sold from January 2021 to December 2023 for prices ranging from \$335,189 to \$530,000 or from \$105.47 to \$178.99 per square foot of living area, including land. The comparables have land assessments ranging from \$26,092 to \$32,649 or from \$3.35 to \$4.06 per square foot of land area and have improvement assessments ranging from \$116,483 to \$148,235 or from \$35.93 to \$50.06 per square foot of living area. 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 \$188,316. The subject's assessment reflects a market value of \$565,005 or \$176.73 per square foot of living area, land included, when using the statutory level of assessment of 33.33%. The subject has a land assessment of \$26,393 or \$3.21 per square foot of land area and an improvement assessment of \$161,923 or \$50.65 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located within the same assessment neighborhood code as the subject and within 0.12 of a mile from the subject. The parcels range in size from 7,060 to 8,800 square feet of land area and are improved with 2-story homes of vinyl siding exterior construction with 2,768 or 3,401 square feet of living area. The dwellings range in age from 6 to 8 years old. Each home has a basement, central air conditioning, and a 440 or a 627 square foot garage. One home has a fireplace. The comparables sold from May 2023 to June 2024 for prices ranging from \$495,000 to \$575,000 or from \$169.07 to \$179.19 per square foot of living area, including land. The comparables have land assessments ranging from \$25,555 to \$26,828 or from \$3.05 to \$3.62 per square foot of land area and have improvement assessment ranging from \$137,213 to \$169,621 or of \$49.57 and \$49.87 per square foot of living area.

The board of review submitted a brief contending four of the appellant's comparables are located outside the subject's assessment neighborhood code and four of these sales occurred more than one year prior to the January 1, 2024 assessment date. The board of review submitted a listing sheet for the subject indicating it was listed in November 2024 for a price of \$574,990 and was taken off the market in December 2024 without selling. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends in part 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

¹ Section 1910.50(c)(1) of the Board's procedural rules 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 § 1910.50(c)(1). As of the development of this Final Administrative decision, the Department of Revenue has not published figures for tax year 2024.

meet this burden of proof and a reduction in the subject's assessment for overvaluation is not warranted.

The record contains a total of eight comparable sales and a November 2024 listing of the subject for the Board's consideration. The Board gives less weight to the appellant's comparables, which sold less proximate in time to the January 1, 2024 assessment date than the other sales in this record or are located more than one mile from the subject.

The Board finds the best evidence of market value to be the board of review's comparables, which sold more proximate in time to the assessment date and are relatively similar to the subject in dwelling size, age, location, site size, and features, although two comparables are much smaller homes than the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These most similar comparables sold for prices ranging from \$495,000 to \$575,000 or from \$169.07 to \$179.19 per square foot of living area, including land. The subject's assessment reflects a market value of \$565,005 or \$176.73 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and falls below the subject's November 2024 listing price of \$574,990. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment for overvaluation is not justified.

The appellant also contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment for assessment inequity is not warranted.

The record contains a total of eight equity comparables for the Board's consideration. With regard to land assessment equity, the Board gives less weight to the appellant's comparable #4, which is located more than one mile from the subject. The Board finds the best evidence of land assessment equity to be the appellant's comparables #1, #2, #3, and #5 and the board of review's comparables, which are located proximate to the subject and are similar to the subject in site size. These comparables have land assessments ranging from \$25,555 to \$29,186 or from \$3.05 to \$3.64 per square foot of land area. The subject's land assessment of \$26,393 or \$3.21 per square foot of land area falls within the range established by the best comparables in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant has not proven by clear and convincing evidence that the subject's land was inequitably assessed and a reduction in the subject's land assessment is not justified.

With respect to improvement assessment equity, the Board gives less weight to the appellant's comparable #4, which is located more than one mile from the subject. The Board finds the best evidence of improvement assessment equity to be the appellant's comparables #1, #2, #3, and #5

and the board of review's comparables, which are located proximate to the subject and are similar to the subject in dwelling size, age, and most features, although two comparables are much smaller homes than the subject and three comparables are slightly older homes than the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables have improvement assessments ranging from \$116,483 to \$169, 621 or from \$35.93 to \$49.87 per square foot of living area. The subject's improvement assessment of \$161,923 or \$50.65 per square foot of living area falls within the range of the best comparables on a total improvement assessment basis and above the range on a per square foot basis. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, such as dwelling size and age, the Board finds the appellant has not proven by clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's improvement assessment is not justified.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

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.

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| | Chairman |
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| Member | Member |
| Dan De Kinin | Sarah Bobber |
| 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: | September 16, 2025 |
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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 <u>PETITION AND EVIDENCE</u> 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

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COUNTY

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