

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Rao TTEES

DOCKET NO.: 24-01215.001-R-1 PARCEL NO.: 14-25-402-008

The parties of record before the Property Tax Appeal Board are Rao TTEES, the appellant, by attorney Brianna L. Golan, of Golan Christie Taglia LLP in Chicago; 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: \$65,939 **IMPR.:** \$232,938 **TOTAL:** \$298,877

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 brick exterior construction with 4,825 square feet of living area. The dwelling was built in 2000 and is approximately 24 years old. Features of the home include a basement, central air conditioning, two fireplaces and a garage with 955 square feet of building area. The property has a site with approximately 73,616 square feet of land area and is located in Long Grove, Ela Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five suggested equity comparables. The comparables are located in the same assessment neighborhood code as the subject and within .68 of a mile from the subject property. The comparables are improved with 2-story dwellings of brick, frame or brick and frame exterior construction ranging in size from 4,312 to 4,816 square feet of living area. The comparables range in age from 26 to 55 years old. Each comparable has a basement, central air conditioning, one or two fireplaces and a garage ranging in size from 744 to 960 square feet of building area. Comparable #1 has a greenhouse and comparable #3 has a pool

enclosure. The comparables have improvement assessments that range from \$157,726 to \$200,745 or from \$34.63 to \$44.52 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$199,852 or \$41.42 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$298,877. The subject property has an improvement assessment of \$232,938 or \$48.28 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three suggested equity comparables. The comparables are located in the same assessment neighborhood code as the subject and within .69 of a mile from the subject property. The comparables are improved with 2-story dwellings of brick or frame exterior construction ranging in size from 4,491 to 4,662 square feet of living area. The dwellings were built in 1994 and 2000. Each comparable has a basement, central air conditioning, one fireplace and a garage ranging in size from 482 to 842 square feet of building area. The comparables have improvement assessments ranging from \$193,703 to \$228,552 or from \$43.13 to \$49.02 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer 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 is not warranted.

The parties submitted eight suggested comparables for the Board's consideration. The Board has given less weight to the appellant's comparables #1 through #4 due to their older ages when compared to the subject. The Board has given reduced weight to appellant's comparable #5 which appears to be an outlier when compared to other comparables in the record.

The Board finds the best evidence of assessment equity to be the board of review comparables. The Board finds that these comparables are most similar to the subject in location, design, age and some features. Adjustments to each of these comparables are necessary for differenced in dwelling size, garage size and fireplace count, when compared to the subject. These most similar comparables have improvement assessments ranging from \$193,703 to \$228,552 or from \$43.13 to \$49.02 per square foot of living area. The subject's improvement assessment of \$232,938 or \$48.28 per square foot of living area falls within the range of the best comparables in this record on a per square foot basis but falls above the range on an overall improvement basis which appears appropriate given the subject's larger dwelling size relative to these comparables.

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 statue 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. <u>Apex Motor Fuel Co. v. Barrett</u>, 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 presented.

Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the 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.

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Member	Member
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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:	December 23, 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

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