



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

APPELLANT: Eric Swanson
DOCKET NO.: 24-01267.001-R-1
PARCEL NO.: 05-03-303-003

The parties of record before the Property Tax Appeal Board are Eric Swanson, 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 **A Reduction** 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: \$32,349
IMPR.: \$264,690
TOTAL: \$297,039

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 frame exterior construction with 3,060 square feet of living area. The dwelling was constructed in 2000. Features of the home include a walkout basement with finished area, central air conditioning, two fireplaces, and a 672 square foot garage. The property has a 10,781 square foot waterfront site and is located in Fox Lake, Grant Township, Lake County.

The appellant contends assessment inequity regarding both the land and improvement assessments as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located from 0.01 to 0.86 of a mile from the subject, two of which are on the same street as the subject and one or two parcels from the subject. The parcels range in size from 10,074 to 14,414 square feet of land area and are improved with 2-story homes ranging in size from 2,552 to 4,058 square feet of living area. The dwellings were built from 1991 to 2016. Each home has a basement, three of which have finished area, central

air conditioning, and a garage ranging in size from 690 to 945 square feet of building area. Three homes have two or three fireplaces. The comparables have land assessments ranging from \$24,048 to \$38,323 or from \$2.39 to \$2.98 per square foot of land area and have improvement assessments ranging from \$164,384 to \$339,066 or from \$64.41 to \$86.88 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 \$314,340. The subject property has a land assessment of \$32,349 or \$3.00 per square foot of land area and an improvement assessment of \$281,991 or \$92.15 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on five equity comparables located from 0.15 of a mile to 1.48 miles from the subject, one of which is on the same street as the subject. The parcels range in size from 5,837 to 24,890 square feet of land area and are improved with 2-story homes ranging in size from 1,814 to 2,945 square feet of living area. The homes were built from 1938 to 1998. Each home has a basement with finished area, central air conditioning, one or three fireplaces, and a garage ranging in size from 231 to 1,020 square feet of building area. The comparables have land assessments ranging from \$14,603 to \$51,555 or from \$2.07 to \$2.96 per square foot of land area and have improvement assessments ranging from \$177,585 to \$275,537 or from \$93.42 to \$98.06 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant argued the board of review's comparable #1 is in a different neighborhood than the subject with a larger lot, an indoor pool and hot tub unlike the subject, a guest house and an older home than the subject. The appellant asserted the board of review's comparable #2 is a custom log home, is dissimilar in dwelling size, and has an outdoor kitchen. The appellant contended the board of review's comparable #3 is dissimilar in lot size and dwelling size and has dissimilar high end finishes, a second kitchen, and an aquarium. The appellant argued the board of review's comparable #4 differs in dwelling size but has a walkout basement on the lake like the subject. The appellant asserted the board of review's comparable #5 is in a different neighborhood along the waterfront and has dissimilar finishes and updates with an additional kitchen. The appellant disclosed the subject was purchased in November 2020 for a price of \$560,000 and the subject is assessed at a much higher value than this purchase price.¹

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,

¹ The Board notes this appeal is based on assessment equity and not on overvaluation.

proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b).

The record contains a total of nine equity comparables for the Board's consideration. With regard to land assessment equity, the Board gives less weight to the appellant's comparable #1 and the board of review's comparables, which are located more than one mile from the subject and/or are less similar to the subject in site size than the other comparable in this record.

The Board finds the best evidence of land assessment equity to be the appellant's comparables #2, #3, and #4, which are more similar to the subject in site size and location, with the appellant's comparables #2 and #3 located the closest in proximity to the subject and on the same street as the subject. The three most similar land equity comparables have land assessments ranging from \$24,048 to \$32,646 or from \$2.39 to \$2.98 per square foot of land area. The subject's land assessment of \$32,349 or \$3.00 per square foot of land area falls within the range established by the best comparables in terms of total land assessment and slightly above the range on a per square foot basis.

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 three best land comparables 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. For the foregoing reasons, the Board finds that 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 regard to improvement assessment equity, the Board gives less weight to the appellant's comparables #3 and #4 and the board of review's comparables, which are located more than one mile from the subject and/or differ substantially from the subject in dwelling size and/or age. The Board finds the best evidence of improvement assessment equity to be the appellant's comparables #1 and #2, which are more similar to the subject in dwelling size, age, location, and features. These comparables have improvement assessments of \$235,840 and \$277,849 or \$71.34 and \$86.88 per square foot of living area, respectively. The subject's improvement assessment of \$281,991 or \$92.15 per square foot of living area falls above the two 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 demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's improvement assessment is 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: _____

December 23, 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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