



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: James Cowhey
DOCKET NO.: 24-01539.001-R-1
PARCEL NO.: 16-18-200-002

The parties of record before the Property Tax Appeal Board are James Cowhey, the appellant, by Andrew J. Rukavina, attorney-at-law of The Tax Appeal Company in Mundelein, 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: \$131,226
IMPR.: \$16,665
TOTAL: \$147,891

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 is improved with a two-story dwelling of wood siding exterior construction containing 1,795 square feet of living area. The dwelling was constructed in 1920 and is approximately 104 years old. Features of the property include a full basement, central air conditioning, one fireplace, 1½ bathrooms, and a detached garage with 620 square feet of building area. The property has a 52,270 square foot site located in Lake Forest, West Deerfield 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 improved with 1.75-story or 2-story dwellings of wood siding or brick exterior construction that range in size from 1,764 to 3,309 square feet of living area. The homes were built from 1945 to 1973. Each property has a full or partial basement with two having finished area, central air conditioning, one fireplace, and 2, 2½

or 3 bathrooms. Comparable #1 has an attached garage with 567 square feet of building area and a detached garage with 269 square feet of building area. Comparables #2 and #3 have garages with 660 and 506 square feet of building area, respectively. The comparables have sites ranging in size from 16,550 to 71,870 square feet of land area. The comparables have the same neighborhood code as the subject and are located from approximately .11 to .50 of a mile from the subject property. The sales occurred from August 2021 to February 2023 for prices ranging from \$406,500 to \$800,000 or from \$219.10 to \$275.39 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$137,866.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$147,891. The subject's assessment reflects a market value of \$443,717 or \$247.20 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on four comparable sales with comparable sale #4 being a duplicate of appellant's comparable sale #1. The comparables are composed of 1-story or 1.75-story dwellings of brick or wood siding exterior construction that range in size from 1,957 to 2,905 square feet of living area. The homes range in age from 62 to 73 years old. Two comparables have a basement with one having finished area. Each property has central air conditioning, one or two fireplaces, and 2, 2½, 3 or 3½ bathrooms. Comparables #1 and #4 have attached garages with 506 and 567 square feet of building area and detached garages with 480 and 269 square feet of building area, respectively. Comparables #2 and #3 have garages with 494 and 506 square feet of building area, respectively. The comparables have sites ranging in size from 26,400 to 60,984 square feet of land area. One comparable has the same neighborhood code as the subject and the comparables are located from approximately .21 to .81 of a mile from the subject property. The sales occurred from March 2022 to November 2024 for prices ranging from \$650,000 to \$800,000 or from \$275.39 to \$352.58 per square foot of living area, including land. The board of review asserted all four sales are in the subject's immediate market area and school district.

The board of review also submitted a copy of the appellant's comparable sales grid analysis and commented that appellant's comparables #2 and #3 sold 27 months and 28 months prior to the 2024 assessment date, respectively.

In rebuttal the appellant's counsel critiqued the board of review comparables asserting comparable #1 is a split-level house with more fireplaces and a larger garage than the subject; comparable #2 is a contemporary ranch home with more fireplaces, more bathrooms and is newer than the subject; comparable #3 is a ranch-style home with superior bathrooms and was built more recently; and comparable #4 (the shared comparable) should be discounted due to being over 1,100 square feet larger than the subject dwelling, having twice the basement size, and 1.5 times the garage space; therefore these are not proper comparables.

¹ Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be considered. 86 Ill.Admin.Code §1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2024.

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 six comparables sales submitted by the parties to support their respective positions with one sale being a duplicate. Five of the comparables submitted by the parties are not particularly similar to the subject in style and/or size and three comparables did not sell proximate in time to the assessment date at issue. The Board gives less weight to appellant's comparables #2 and #3 that sold in September 2021 and August 2021, respectively, not as proximate in time to the assessment date as the best sales in this record. The Board gives less weight to board of review comparable #3 that sold in March 2022, not as proximate in time to the assessment date at issue as the three remaining sales. The Board gives most weight to appellant's comparable #1/board of review comparable #4, and board of review comparables #1 and #2 that sold from February 2023 to November 2024. These three comparables differed from the subject in age, style and/or size and have varying degrees of similarity to the subject in features such as bathroom count, basement amenity, number of fireplaces and garage size, which would require adjustments to make them more equivalent to the subject property. Nevertheless, these three comparables sold for prices ranging from \$650,000 to \$800,000 or from \$275.39 to \$342.55 per square foot of living area, including land. The subject's assessment reflects a market value of \$443,717 or \$247.20 per square foot of living area, including land, which is below the range established by the best comparable sales in this record. Based on this evidence the Board finds the subject's assessment is reflective of the property's fair cash value and 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: _____

C E R T I F I C A T I O N

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 20, 2026



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

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