



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: SOPHIE ZIMMY  
DOCKET NO.: 24-01584.001-R-1  
PARCEL NO.: 16-09-113-016

The parties of record before the Property Tax Appeal Board are SOPHIE ZIMMY, the appellant, by attorney Andrew J. Rukavina, 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:

|               |           |
|---------------|-----------|
| <b>LAND:</b>  | \$74,966  |
| <b>IMPR.:</b> | \$171,779 |
| <b>TOTAL:</b> | \$246,745 |

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 two-story dwelling of wood siding exterior construction with 3,089 square feet of living area. The dwelling was constructed in 1977 and is approximately 47 years old. Features of the home include an unfinished basement, central air conditioning, a fireplace, and a 420 square foot garage. The property has a 12,750 square foot site and is 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 five comparable sales located from .08 to .28 of a mile from the subject. The comparables have sites ranging in size from 12,750 to 21,150 square feet of land area and are each improved with a two-story dwelling of brick or wood siding exterior construction. The homes are 36 to 57 years old and range in size from 2,552 to 3,388 square feet of living area. Each dwelling has a basement, two of which have finished area, central air

conditioning, one or two fireplaces, and a garage ranging in size from 506 to 616 square feet of building area. The comparables sold from November 2022 to August 2024 for prices ranging from \$530,000 to \$705,250 or from \$198.49 to \$221.32 per square foot of living area, including land.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$214,314 which would reflect a market value of approximately \$643,006 or \$208.16 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$246,745. The subject's assessment reflects a market value of \$740,309 or \$239.66 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.<sup>1</sup>

In response to the appeal, the board of review reported that the subject property sold in April 2024 for \$1,015,000, above the asking price, as depicted the Multiple Listing Service data sheet. The subject sold in 4 days and reported having been fully remodeled in 2007, updated with a chef's kitchen in 2021, bathrooms were updated in 2021 and a new roof was installed in 2023, along with two air conditioning units.

As to the comparables presented by the appellant, the board of review asserted that comparable #1 was sold "in need of TLC"; #2 sold as-is from an estate sale and occurred 25 months prior to the lien date at issue, comparable #3 was sold as-is and reported the home "needed rehab," and #4 was tenant occupied and sold in as-is condition as depicted in attached multiple listing data sheets.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located in the same neighborhood code and within .31 of a mile from the subject. The comparables have sites ranging in size from 13,345 to 20,060 square feet of land area which are each improved with a 1.75-story or a 2-story dwelling of brick or wood siding exterior construction. The homes range in age from 56 to 59 years old and range in size from 3,001 to 3,400 square feet of living area. The comparables have basements, two of which have finished area, central air conditioning, one or two fireplaces, and a garage ranging in size from 483 to 552 square feet of building area. The comparables sold from April 2023 to July 2024 for prices ranging from \$732,000 to \$1,206,000 or from \$243.35 to \$354.71 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, appellant's counsel contended that each of the board of review comparables have greater land value than the subject and have larger garages and/or more bathrooms than the subject. The appellant did not comment on the data concerning the recent sale of the subject property.

---

<sup>1</sup> 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 §1910.50(c)(1). As of the development of this decision, the Department of Revenue has yet to publish 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 parties submitted a total of nine comparable sales along with data on the recent sale of the subject for the Board's consideration. The Board gives less weight to appellant's comparables #3, #4 and #5 as well as board of review comparables #2 and #4, due to the difference in age when compared to the subject or the finished basement feature, which is not a feature of the subject.

The Board finds the best evidence of market value in the record consists of appellant's comparables #1 and #2 along with board of review comparables #1 and #3 as well as the subject's unrefuted sale price in April 2024. The four comparable sales present varying degrees of similarity to the subject. Each of the best comparables are located within .31 of a mile from the subject. These four dwellings range in age from 47 to 59 years old, necessitating adjustments to most of the comparables to make them more equivalent to the subject's age. Likewise, the dwellings differ in dwelling size, basement size, fireplace count, and/or garage capacity when compared to the subject necessitating additional adjustments to the comparables. The best four comparables sold from November 2022 to July 2024 for prices ranging from \$580,000 to \$838,000 or from \$198.49 to \$252.49 per square foot of living area, including land. Lastly, the subject sold in April 2024 for \$1,015,000 or \$328.59 per square foot of living area, including land. The subject's assessment reflects a market value of \$740,309 or \$239.66 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record both in terms of overall value and on a per square foot of living area basis, including land, and is significantly below the subject's recent purchase price.

After considering adjustments to the best comparables for differences when compared to the subject and giving some weight to the subject's recent purchase price, 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: \_\_\_\_\_

**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**

**AGENCY**

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

**APPELLANT**

SOPHIE ZIMMY, by attorney:  
Andrew J. Rukavina  
The Tax Appeal Company  
28643 North Sky Crest Drive  
Mundelein, IL 60060

**COUNTY**

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