



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

APPELLANT: David Kelly
DOCKET NO.: 24-01816.001-R-3
PARCEL NO.: 15-14-207-024

The parties of record before the Property Tax Appeal Board are David Kelly, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC, in Hawthorn Woods, 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: \$72,610
IMPR.: \$535,937
TOTAL: \$608,547

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 brick and frame exterior construction with 4,465 square feet of living area. The dwelling was constructed in 2019 and is approximately 5 years old. Features of the home include a basement with 1,782 square feet of finished area, 3 full bathrooms, 2 half-baths, central air conditioning, a fireplace, and a 1,104 square foot garage. The property has a 28,341 square foot site and is located in Lincolnshire, Vernon 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, none of which are located in the same neighborhood code as the subject. The comparables are from .21 of a mile to 1.48-miles from the subject. The parcels range in size from 20,038 to 96,703 square feet of land area which are each improved with a two-story dwelling of brick or frame exterior construction. The dwellings

range in age from 36 to 52 years old and range in size from 3,739 to 4,303 square feet of living area. Each comparable has a basement, four of which have finished area, 2½ to 4½ bathrooms, central air conditioning, and a garage ranging in size from 720 to 946 square feet of building area. Four comparables have from one to three fireplaces. The comparables sold from February to December 2023 for prices ranging from \$350,000 to \$1,050,000 or from \$87.19 to \$261.71 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment of \$272,338 which reflects a market value of \$817,096 or \$183.00 per square foot of living area, including land, using the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$608,547. The subject's assessment reflects a market value of \$1,825,824 or \$408.92 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

As part of its submission, the board of review provided a copy of the Illinois Real Estate Transfer Declaration PTAX-203 depicting the sale of the subject dwelling in September 2019 for a price of \$1,761,255, where the property was advertised prior to the transaction and the property was transferred via Special Warranty Deed. The sale price was reported to have been \$1,761,255, including land.

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 .10 of a mile from the subject. The parcels range in size from 24,002 to 39,252 square feet of land area and are each improved with two-story dwellings of frame or frame with brick exterior construction. The dwellings are either new construction or 2 years old and range in size from 4,936 to 5,387 square feet of living area. Features of the homes include a basement, three of which have finished area, 3 or 4 full bathrooms, 1 or 2 half-baths, central air conditioning, and a garage ranging in size from 960 to 1,265 square feet of building area. Two homes each have one fireplace. The comparables sold from January 2023 to March 2024 for prices ranging from \$2,272,855 to \$2,927,002 or from \$443.44 to \$543.35 per square foot of living area, including land.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

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

¹ 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 Sec. 1910.50(c)(1). Prior to the issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2024.

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 suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #4 as well as board of review comparable #1, due to substantial differences in dwelling size, when compared to the subject dwelling. The Board has given reduced weight to appellant's comparable #1, which has a sale price significantly below the remaining comparables in the record suggesting this sale price reflects an outlier in light of other more similar sales in the record. The Board has given reduced weight to board of review comparable #3, due to the lack of finished basement area, which is a feature of the subject and a feature of other sales in the record.

While none of the comparables are particularly similar to the subject, the Board finds the best market value evidence in the record consists of the appellant's comparables #2, #3 and #4 along with board of review comparables #2 and #4, despite differences in location and age. These properties necessitate adjustments for their differences in age as compared to the 5-year-old subject dwelling. Several comparables need adjustments for differing bathroom count when compared to the subject. Additional adjustments are necessary for differences in dwelling size, basement size, size of basement finish, fireplace count/amenity, and/or garage size differences. These best comparables sold from February 2023 to March 2024 for prices ranging from \$787,500 to \$2,285,511 or from \$183.01 to \$460.46 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,825,824 or \$408.92 per square foot of living area, including land, which is within the range of the best comparable sales in this record both in terms of overall value and on a per-square-foot of living area basis. The Board finds the subject's overall value is logical given the subject's age and dwelling along with its substantial garage size.

Based on this evidence, giving some weight to the subject's 2019 purchase price and after considering appropriate adjustments to the best comparable sales in the record for differences from the subject to make the comparables more equivalent to the subject, the Board finds a reduction in the subject's assessment is not justified on grounds of overvaluation.

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: _____

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

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