



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

APPELLANT: Sean Olszowka
DOCKET NO.: 24-02504.001-R-1
PARCEL NO.: 05-01-203-004

The parties of record before the Property Tax Appeal Board are Sean Olszowka, 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 **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: \$12,242
IMPR.: \$85,120
TOTAL: \$97,362

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 one-story dwelling of wood exterior construction with 1,164 square feet of living area.¹ The dwelling was constructed in 1989 and is approximately 35 years old. Features of the home include a basement with 1,008 square feet of finished area, central air conditioning, 3 bathrooms and a garage with 600 square feet of building area. The property has a 9,328 square foot site and is located in Lake Villa, Lake Villa 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 properties that have the same assessment neighborhood code as the subject and are located within .2 of a mile from the subject property. The comparables have sites that range in size from 8,721 to 12,708 square feet of land area. The

¹ The Board finds the best description of the subject property is found in the subject's proper record card provided by the board of review that contained a schematic diagram, dimensions of the improvements and dimensions of the subject's site, which was not refuted by the appellant.

comparables are improved with one-story dwellings of wood siding exterior construction ranging in size from 988 to 1,100 square feet of living area. The dwellings are 35 or 45 years old. The comparables each have a basement with 532 to 1,008 square feet of finished area, central air conditioning and either 1, 1½ or 2 bathrooms. Each comparable has a garage ranging in size from 484 to 600 square feet of building area. The comparables reportedly sold from November 2022 to May 2024 for prices ranging from \$200,000 to \$270,000 or from \$202.43 to \$249.08 per square foot of living area, including land.²

The appellant also submitted a Collateral Analytics Value AVM (automated valuation model) report estimating the subject property has a market value of \$242,000. The report was prepared by Catherine M. Hewitt for a home equity line of credit that was requested by PNC Bank. In estimating the market value of the subject property, Hewitt chose ten comparable properties identified as comparables “A” through “J” in the report, where nine of the comparables were reported to have sold from May 2023 to April 2024 for prices ranging from \$220,000 to \$320,000.³ No sales data was provided for comparable #E. The comparables are located within .73 of a mile from the subject property and have sites that range in size from .2 to .29 of an acre of land area. The comparables range in size from 1,066 to 2,100 square feet of living area and have 1, 2 or 3 bathrooms. The dwellings were built from 1955 to 1999. Hewitt concluded that after reviewing all data, there appears to be a sufficient amount of sales with relative characteristics similar to the subject that provides support to the value conclusion of the AVM of \$242,000.

Based on this evidence, the appellant requested the subject’s total assessment be reduced to \$91,023, which would reflect a market value of \$273,096 or \$234.62 per square foot of living area, including land, when 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 \$97,362. The subject's assessment reflects a market value of \$292,115 or \$250.96 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.⁴

In support of its contention of the correct assessment the board of review submitted information on three comparable properties that have the same assessment neighborhood code as the subject and are located within .73 of a mile from the subject property. The board of review’s comparable #1 is the same property as the appellant’s comparable #2 and board of review comparable #3 is the same property as comparable “I” in the appellant’s automated valuation model report. The comparables have sites that range in size from 9,019 to 12,708 square feet of land area. The comparables are improved with one-story dwellings of wood siding exterior construction ranging in size from 929 to 1,100 square feet of living area. The dwellings are from

² The property record card for the appellant’s comparable #2 depicted a sale date of April 2024.

³ Comparable “E” in the automated valuation model report is the same property as the appellant’s comparable #2 depicted in the comparable sales grid analysis in the appeal petition. This property sold in April 2024 for \$265,000, which was not included in the report by Hewitt.

⁴ 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 drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

44 to 50 years old. The comparables each have a basement with finished area, central air conditioning and either 1½, 2 or 3 bathrooms. Each comparable has a garage ranging in size from 484 to 528 square feet of building area. The comparables sold from May 2023 to April 2024 for prices of \$265,000 or \$275,000 or from \$240.91 to \$296.02 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 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 five comparable sales for the Board's consideration, as one sale was common to both parties and the appellant also presented an automated valuation model report to support their respective positions before the Board. The Board has given no weight to the value conclusion contained in the report, as this report is not an appraisal prepared by a certified real estate appraiser. The Board finds the report did not describe the designs of the comparable dwellings, nor did it include amenities of the comparables such as central air conditioning and/or whether the properties have a garage, in order to allow the Board to make a meaningful comparative analysis between the comparables and the subject. Moreover, four of the comparable dwellings used in the report are substantially larger in dwelling size, when compared to the subject and two comparables have considerably older dwelling ages.

With respect to the five comparable sales provided by the parties, the Board has given less weight to the appellant's comparable #1 which has a sale date that occurred in 2022, less proximate in time to the January 1, 2024 assessment date than other sales in the record.

The Board finds the best evidence of market value to be the appellant's comparables #2 and #3, along with the three comparables submitted by the board of review, which includes the common comparable. The Board finds these four comparables sold more proximate to the lien date at issue and are similar to the subject in location, site size, dwelling size and design. However, the Board finds the comparables are inferior to the subject dwelling in that the dwellings are from 10 to 15 years older than the subject, three of the four comparables have a fewer number of bathrooms, one comparable has considerably less basement finish and three comparables have smaller garage sizes when compared to the subject, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, these properties sold from February 2023 to April 2024 for prices ranging from \$200,000 to \$275,000 or from \$202.43 to \$296.02 per square foot of living area, including land. The subject's assessment reflects a market value of \$292,115 or \$250.96 per square foot of living area, including land, which falls above the range established by the best comparable sales in this record in terms of overall market value but within the range on a price per square foot of living area basis, including land. The subject's higher overall value appears to be logical given the subject's

newer age and superior features. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. Therefore, based on this evidence 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: _____

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:

May 19, 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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