



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

APPELLANT: Arun Narang
DOCKET NO.: 24-03244.001-R-1
PARCEL NO.: 14-20-100-014

The parties of record before the Property Tax Appeal Board are Arun Narang, the appellant, by attorney Andrew J. Rukavina of The Tax Appeal Company in Mundelein; and the McHenry 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 **McHenry** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$75,943
IMPR.: \$353,821
TOTAL: \$429,764

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the McHenry 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 brick exterior construction with 12,056 square feet of living area. The dwelling was constructed in 2002 and is approximately 22 years old. Features of the home include a walkout basement with finished area,¹ central air conditioning, one fireplace, a three-car garage containing 1,000 square feet of building area. The subject has a site contains approximately 9.99 acres of land area and is located in Crystal Lake, Nunda Township, McHenry County.²

¹ The appellant described the subject dwelling with 6,505 square feet of basement finish, which was not refuted by the board of review nor was it reported in the appraisal submitted by the board of review.

² The subject's site size is found in the appraisal submitted by the board of review, which contains a plat map depicting dimensions of the site. (pg. 11)

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparables sales. The appellant did not provide the distance between the comparables and the subject. The appellant reported the comparables have sites that range in size from 8,540 to 10,849 square feet of land area and are improved with 2-story dwellings of frame, brick or brick and stucco exterior construction ranging in size from 8,540 to 10,849 square feet of living area. The dwellings were built from 1983 to 1995. The comparables each have a basement with finished area, central air conditioning, a fireplace and a garage containing 1,000 square feet of building area. The comparables sold from January 2022 to May 2023 for prices ranging from \$790,000 to \$1,000,000 or from \$83.58 to \$100.70 per square foot of living area, including land.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$366,630, which would reflect a market value of \$1,100,000 or \$91.24 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 \$429,764. The subject's assessment reflects a market value of \$1,289,421 or \$106.95 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.³

In support of its contention of the correct assessment, the board of review submitted an appraisal report prepared by Lee Ovington, MAI, SRA, a Certified General Real Estate Appraiser. The purpose of the appraisal was to form one or more opinions about fair cash value or market value of the subject's fee simple estate, assuming no liens or encumbrances other than normal covenants and restrictions of record. The appraiser estimated the subject property had a market value of \$1,300,000 as of January 1, 2024.

Using the sales comparison approach, the appraiser considered nine comparable sales, where comparables #7, #8 and #9 are the same as the appellant's comparables #2, #3 and #1, respectively. The appraiser did not provide the distance between the comparables and the subject. The appraiser did disclose that the nine comparables are located in Crystal Lake, West Dundee or Woodstock and have sites that range in size from 1.58 to 22.09 acres of land area.⁴ The comparables are improved with 1-story, 1.5-story or 2-story dwellings ranging in size from 3,710 to 10,849 square feet of living area.⁵ The dwellings are from 9 to 48 years old. The comparables each have a basement where one basement is an English style and seven basements are walkout designs, six of which have finished area. Each comparable has central air conditioning and a three-car or a four-car garage. Five comparables each have an inground

³ Section 1910.50(c)(1) of the Board's procedural rules 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. Adm. Code § 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for tax year 2024.

⁴ The Board finds the board of review's appraisal contained the best evidence of the three common comparables' site sizes, since the appellant's grid analysis described the site sites of these comparables to be equal to their dwelling sizes.

⁵ The parties differ as to the story height of board of review comparable #7/appellant's comparable #2. The Board finds the dwelling is a 1-story design as depicted in the photographic evidence found in the appraisal submitted by the board of review. (pg. 27)

swimming pool. The comparables sold from June 2021 to May 2024 for prices ranging from \$790,000 to \$1,995,000 or from \$80.83 to \$431.27 per square foot of living area, including land. The appraiser adjusted the comparables for date of sale and also made adjustments to the comparables for differences from the subject in site size, quality construction, appeal, condition, dwelling size and other features to arrive at adjusted prices ranging from \$1,201,784 to \$1,525,490. As a result, the appraiser arrived at an estimated market value for the subject of \$1,300,000, including land, as of January 1, 2024.

Based on this evidence, the board of review requested confirmation of the subject's 2024 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 appellant submitted three comparables sales and the board of review submitted an appraisal of the subject property, where all three of the appellant's comparables were also utilized by the board of review's appraiser, to support their respective positions before the Property Tax Appeal Board.

The Board has given less weight to the appellant's comparables which differ from the subject in age or the sale dates occurred in 2022, less proximate in time to the January 1, 2024 assessment date than other sales in the record. The Board has also given little weight to the value conclusion in the board of review's appraisal as the appraiser's comparables #2, #3 and #9/appellant comparable #1 differ significantly from the subject in dwelling size and/or age. The Board has also given less weight to board of review appraisal comparables #2, #4, #5, #6, #7/appellant comparable #2 and #8/appellant comparable #3 which have sale dates that occurred in 2021 or 2022, less proximate in time to the lien date at issue and are thus less likely to be indicative of the subject's market value as of the January 1, 2024 assessment date. The Board finds these factors undermine the credibility of the appraiser's conclusion of value.

The Board finds the best evidence of market value to be board of review appraisal comparables #1 and #6, which sold more proximate in time to the January 1, 2024 assessment date. However, the Board finds these two comparables are both inferior to the subject in dwelling size and/or site size, suggesting upward adjustments would be required to make the comparables more equivalent to the subject, although appraisal comparable #1 is a 1-story design when compared to the subject's 2-story design. Additionally, each comparable has other features with varying degrees of similarity when compared to the subject, suggesting adjustments for these differences would also be necessary. Nevertheless, these two properties sold in February and June 2023 for prices of \$1,200,000 and \$1,225,000 or for \$183.26 and \$201.85 per square foot of living area, including land. The subject's assessment reflects an estimated market value of \$1,289,421 or \$106.95 per square foot of living area, including land, which falls above the two best

comparables sales in the record in terms of overall market value and below the comparables on a price per square foot of living area basis, which appears to be logical given the subject's larger site size and larger dwelling size. 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 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: _____

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

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