



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

APPELLANT: James West
DOCKET NO.: 24-03354.001-R-1
PARCEL NO.: 14-24-300-055

The parties of record before the Property Tax Appeal Board are James West, 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: \$71,271
IMPR.: \$302,553
TOTAL: \$373,824

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 and frame exterior construction with 4,460 square feet of living area.¹ The dwelling was constructed in 1999 and is approximately 25 years old. Features of the home include a walkout basement with finished area, central air conditioning, an attached 823 square foot 3-car garage, a detached 1,332 square foot 3-car garage with a 1,332 square foot accessory dwelling unit on the second level, and a coach house with 1,234 square feet of living area. The property has a 14.32 acre site and is located in Prairie Grove, Nunda Township, McHenry County.

¹ The parties disagree on the subject's dwelling size. The Board finds the best evidence of the subject's features is found in the appellant's appraisal, which includes a sketch with measurements of the subject's improvements, whereas the appraisal submitted by the board of review did not include a sketch with measurements and omitted the subject's coach house.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared by Carolyn Metz, a certified residential real estate appraiser, estimating the subject property had a market value of \$975,000 as of January 1, 2024. The appraisal was prepared for tax appeal purposes using the sales comparison and cost approaches to value.

The appraiser inspected the subject property on December 23, 2024 and determined the improvements to be in average condition with the home having high-end finishes. The appraiser reported the subject was transferred to a trust in February 2022 for a reported price of \$1,399,000, which the appraiser contended was above its appraised market value of \$875,000 at that time.

Under the sales comparison approach, the appraiser selected six comparable sales located in Crystal Lake, Prairie Grove, Lake Barrington and McHenry and from 0.63 of a mile to 5.86 miles from the subject. The appraiser explained it was necessary to select comparables more than one mile away and outside Crystal Lake, due to a lack of recent sales. The appraiser asserted these communities have a similar median sale price to Crystal Lake, except for the property in Lake Barrington, which received a 17% downward adjustment for its market area.

The comparables have sites ranging in size from 1.04 to 22.11 acres of land area which are improved with Traditional, Contemporary, Farmhouse or Ranch dwellings. The homes range in age from 19 to 56 years old and range in size from 3,688 to 10,849 square feet of living area. Each dwelling has a basement, five of which have finished area, central air conditioning, and from a 3-car to a 5-car garage. Comparable #5 has 2 bedroom/1.5 bathroom coach house. Comparable #6 has an inground swimming pool. The comparables sold from May 2022 to January 2024 for prices ranging from \$765,000 to \$1,067,500 or from \$80.83 to \$207.92 per square foot of living area, including land.

The appraiser adjusted the comparables for differences from the subject, including a location adjustment to comparable #5 of \$144,500 and adjustments of 25% to four sales for condition, to arrive at adjusted sales prices ranging from \$933,565 to \$1,031,185. The appraiser stated more weight was placed on comparable #3 as this property had the fewest net adjustments and less weight was given to comparable sale #5 due to location in Lake Barrington. Based on this data, the appraiser estimated the subject had an estimated value of \$975,000 under the sales comparison approach.

Under the cost approach, the appraiser estimated the subject had a site value of \$160,000. The appraiser estimated the replacement cost new of the improvements to be \$1,573,166 and physical depreciation to be \$655,538, resulting in a depreciated improvement value of \$917,628. The appraiser also estimated the site improvements had a value of \$10,000. Adding the various components, the appraiser estimated the subject property had an estimated market value of \$1,087,628 under the cost approach.

In reconciliation, the appraiser gave the most weight to the sales comparison approach as reflective of typical buyers and sellers and gave little weight to the cost approach due to the subject's age. The appraiser concluded a market value of \$975,000 as of January 1, 2024.

The appellant also submitted information on three comparable sales located in Woodstock, Crystal Lake, or Prairie Grove and from 0.61 of a mile to 5.42 miles from the subject.² The parcels range in size from 0.9 to 6.63 acres of land area and are improved with a 2-story homes ranging in age from 45 to 138 years old and ranging in size from 3,719 to 4,450 square feet of living area. Two comparables have basements and each home has central air conditioning. Two comparables each have a 500 or a 750 square foot garage. The comparables sold from August 2023 to June 2024 for prices ranging from \$525,000 to \$630,000 or from \$117.98 to \$166.98 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$373,824. The subject's assessment reflects a market value of \$1,121,584 or \$251.48 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 presented an appraisal prepared for the Nunda Township Assessor by Lee Ovington, a certified general real estate appraiser, estimating the subject property had a market value of \$1,250,000 as of January 1, 2024. The appraiser made an exterior only inspection of the subject. The appraiser reported the subject sold in September 2021 for a price of \$1,399,000 to the current owner.

Under the sales comparison approach, the appraiser selected seven comparable sales located in Crystal Lake, West Dundee, and Woodstock and from 0.92 of a mile to 13.37 miles from the subject. Comparable #7 is the same sale as the appellant's appraisal sale #2. The parcels range in size from 1.58 to 19.82 acres of land area and are improved with 1-story, 1.5-story, or 2-story dwellings. Comparable #6 is of log construction. The homes range in age from 9 to 48 years old and range in size from 3,710 to 6,548 square feet of living area. Each home has a basement, six of which are walkouts and five of which have finished area. Each comparable has central air conditioning and a 3-car or a 4-car garage. Four comparables each have an inground swimming pool. Comparable #3 has a sport court and comparable #4 has an 8,500 square foot heated pole barn. The comparables sold from June 2021 to April 2024 for prices ranging from \$1,067,500 to \$1,995,000 or from \$183.26 to \$431.27 per square foot of living area, including land.

The appraiser adjusted each comparable for market conditions and then adjusted the comparables for differences from the subject, including adjustments of -\$200,000 or -\$300,000 to four sales for "appeal" based on MLS photographs. The appraiser also adjusted for additional features, ranging from -\$400,000 to \$100,000 and considering an inground swimming pool amenity to have the same value as the subject's accessory dwelling unit. The appraiser arrived at adjusted sale prices ranging from \$1,055,849 to \$1,389,625, with an average of \$1,269,000. The appraiser

² The board of review reported the proximity of these comparables in relation to the subject, whereas the appellant indicated "N/A" for their proximity to the subject.

³ 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.

gave comparables #2, #5, and #6, with adjusted prices from \$1,195,239 to \$1,329,339, the most weight as these sales had the lowest net adjustments. Based on this data, the appraiser estimated the subject had a value of \$1,250,000 as of January 1, 2024.

In response to the appellant's evidence, the board of review submitted comments from the township assessor summarizing the evidence submitted by both parties. The board of review presented a grid of the appellant's comparable sales describing comparable #1 with 3,619 square feet of living area, no central air conditioning, a barn, an inground swimming pool, and a pool house; comparable #2 with finished basement area and a 1,038 square foot garage; and comparable #3 with a 1.93 acre site, 4,431 square feet of living area, and a 624 square foot garage.⁴ The board of review also submitted the listing sheet from the July 2021 sale of the subject for a price of \$1,399,000 after being marketed for sale for 8 days and describing the subject property has having a pond and log cabin used for storage. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant claimed that the board of review has not refuted the appellant's evidence.⁵

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 an appraisal and three comparable sales and the board of review submitted an appraisal and evidence of a July 2021 sale of the subject in support of their respective positions before the Board.

Although the appraisers reported different sale dates for the subject, the Board finds the best evidence of the subject's sale is the listing sheet presented by the board of review, which discloses a sale date in July 2021. The Board gives some weight to the subject's July 2021 sale, although this sale occurred approximately two and a half years before the assessment date.

The Board also gives less weight to the appraised value conclusions presented in each of the appraisals. The Board finds the selection of comparables and the adjustments to be problematic in each appraisal. Two of the six appellant's appraisal sales are significantly larger homes than the subject, requiring large adjustments, one of which was the sale given the most weight by the appraiser. Furthermore, one comparable is located in a dissimilar community for which the appraiser made a large adjustment. The appellant's appraiser made large adjustments for condition, which suggests these properties are not truly similar to the subject.

⁴ The Board notes neither party presented property record cards to substantiate the features of these comparables.

⁵ Although the board of review did not critique the appellant's evidence, the Board finds the board of review submitted an appraisal to support the subject's assessment.

With respect to the board of review's appraisal, three of the seven appraisal sales are located more than 10 miles from the subject, two of which are sales given the most weight by the appraiser. The board of review's appraiser made large adjustments to four comparables for "appeal" based on photographs found in the MLS, which were not further explained. The board of review's appraiser assumed an inground swimming pool amenity had the same value as the subject's accessory dwelling unit but failed to take into account the subject's coach house when adjusting the comparables.

For these reasons, the Board finds each of the appraisals states a less credible and/or reliable opinion of value and the Board will instead consider the raw sales data presented in each appraisal and the appellant's three comparable sales.

The record contains a total of fifteen comparable sales, with one common sale, for the Board's consideration. The Board gives less weight to the appellant's comparables #2 and #3, the appellant's appraisal sales, and the board of review's appraisal sales #1, #2, #4, #6, and #7, due to substantial differences from the subject in dwelling size, site size, and/or location.

The Board finds the best evidence of market value to be the appellant's comparable #1 and the board of review's appraisal sales #3 and #5, which sold proximate in time to the assessment date and are more similar to the subject in design, dwelling size, site size, and location, but have varying degrees of similarity to the subject in age and features. Two comparables are substantially older homes than the subject, none of these comparables have a second garage with an accessory dwelling unit, a coach house, or a pond like the subject, suggesting upward adjustments to the comparables would be needed to make them more equivalent to the subject. However, these comparables each have an inground swimming pool unlike the subject, one comparable has a sport court, and one comparable has a barn, suggesting downward adjustments for these features would be needed.

The comparables sold for prices ranging from \$621,000 to \$1,600,000 or from \$166.98 to \$431.27 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,121,584 or \$251.48 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not justified.

Further, the subject's market value reflected in its assessment is below its 2021 purchase price of \$1,399,000 which provides additional support for the subject's assessment.

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

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:

February 17, 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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