



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

APPELLANT: Mike Hellios
DOCKET NO.: 24-03405.001-R-2
PARCEL NO.: 10-20-251-003

The parties of record before the Property Tax Appeal Board are Mike Hellios, 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: \$116,444
IMPR.: \$169,244
TOTAL: \$285,688

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 2,780 square feet of living area. The dwelling was constructed in 1982 and is 42 years old. Features of the home include a full basement with finished area, central air conditioning, two fireplaces, and a 1,224 square foot garage.¹ The property has a 75,794 square foot waterfront site and is located in McHenry, McHenry Township, McHenry County.

The appellant's appeal is based on both unequal treatment in the assessment process as well as overvaluation concerning the subject property. In support of these arguments the appellant submitted information on three comparables. The comparables consist of 2-story dwellings of masonry or masonry and stucco exterior construction ranging in size from 1,860 to 3,534 square

¹ The Board finds the subject's property record card submitted by the board of review to be the best evidence of the subject's features.

feet of living area. The homes were built from 1925 to 2009. Each dwelling is reported to have central air conditioning, a fireplace, and a garage ranging in size from 390 to 768 square feet of building area. Comparable #1 has an additional 728 square foot garage. One comparable has a basement with finished area and two comparables are reported to have crawl-space foundations. The comparables have improvement assessments ranging from \$84,151 to \$123,787 or from \$35.03 to \$47.08 per square foot of living area. The parcels range in size from 4,020 to 50,681 square feet of land area. The comparables reportedly sold from November 2022 to May 2023 for prices ranging from \$400,000 to \$625,000 or from \$176.85 to \$245.16 per square foot of living area, including land.²

Based on this evidence, the appellant requested a reduced improvement assessment of \$58,669 or \$21.10 per square foot of living area and a reduced total assessment of \$175,113, for an estimated market value of \$525,392 or \$188.99 per square foot of living area, including land, when applying 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 \$285,688. The subject property has an improvement assessment of \$169,244 or \$60.88 per square foot of living area. The subject's total assessment reflects a market value of \$857,150 or \$308.33 per square foot of living area, including land, 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 information on four equity comparables and three comparable sales. The sales comparables are located from .32 of a mile to 3.08 miles from the subject and consist of 1-story, 1.5-story, or 2-story dwellings of frame, vinyl siding, or brick and aluminum siding exterior construction ranging in size from 1,985 to 3,321 square feet of living area. The comparables have either lakefront or riverfront sites. The dwellings range in age from 20 to 52 years old. Each dwelling has central air conditioning, one or two fireplaces, a basement with two having finished area, and a garage ranging in size from 460 to 1,400 square feet of building area. The parcels range in size from 10,950 to 47,992 square feet of land area. The comparables sold from August 2024 to July 2025 for prices ranging from \$750,000 to \$1,250,000 or from \$351.95 to \$440.81 per square foot of living area, including land.

The equity comparables are located within the subject's assessment neighborhood and within .17 of a mile of the subject. The comparables consist of 1-story dwellings of frame and brick exterior construction ranging in size from 2,691 to 3,023 square feet of living area. The homes are either 18 or 35 years old. Each dwelling has central air conditioning, two fireplaces, a basement with finished area, and a garage ranging in size from 672 to 1,132 square feet of building area. The comparables have improvement assessments ranging from \$173,543 to \$179,493 or from \$59.37 to \$66.37 per square foot of living area.

² The board of review reported that comparable #2 sold in October 2022 for \$620,000.

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 §1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

In a memorandum, the board of review noted that the appellant's comparable #1 is not a waterfront property like the subject and comparable #3 is a channel front property.

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

Conclusion of Law

The taxpayer contends, in part, assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill. Admin. Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity, and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill. Admin. Code §1910.65(b). 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 seven equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the comparables submitted by the appellant, which differ from the subject in age, location, dwelling size, foundation, and/or features. The Board also gives less weight to board of review comparable #7, which differs from the subject in age.

The Board finds the best evidence of assessment equity to be board of review comparables #6 and #8, which are similar to the subject in age, location, dwelling size, and features. These comparables have improvement assessments of \$178,608 and \$179,493 or \$59.37 and \$59.38 per square foot of living area. The subject's improvement assessment of \$169,244 or \$60.88 per square foot of living area falls below the two best comparables in this record overall and is slightly above the best comparables on a per-square-foot basis. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified on equity grounds.

The appellant also 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 six comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the comparables submitted by the appellant, which differ from the subject in location, foundation, site size, and/or sold less proximate to the assessment date at issue. The Board also gives less weight to the board of review comparable sale #1, which sold 19 months after the January 1, 2024 assessment date.

The Board finds the best evidence of market value to be the board of review's comparables #2 and #3, which sold proximate to the assessment date at issue, are similar waterfront properties, and have varying degrees of similarity to the subject in age, design, dwelling size, and site size. These most similar comparables sold in August and October 2024 for prices of \$750,000 and \$875,000 or \$351.95 and \$440.81 per square foot of living area, including land. The subject's assessment reflects a market value of \$857,150 or \$308.33 per square foot of living area, including land, which is within the range established by the best comparable sales in this record overall and below the range on a per-square-foot basis. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified based on 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: _____

November 25, 2025



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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