FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Edward Nick
DOCKET NO.: 25-02126.001-R-1
PARCEL NO.: 14-09-401-021

The parties of record before the Property Tax Appeal Board are Edward Nick, 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:	$35,266
IMPR.:	$42,053
TOTAL:	$77,319

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 2025 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 frame exterior construction with 1,508 square feet of living area[1]. The dwelling is approximately 167 years old and has an effective age of 85 years old[2]. Features of the home include a basement and a 2-car garage. The property has a 50,497 square foot site and is located in Lake Zurich, Ela Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of $100,000

[1] The Board finds the best description of the subject's dwelling and garage areas was found in the sketch, contained in the appellant's appraisal, which was more detailed than the board of review's sketch presented in the subject's property record card.
[2] The Board finds the best description of the subject's effective age was found on the property record card submitted by the board of review, not refuted by the appellant.

as of January 1, 2025. The appraisal was prepared by R. Steven Kephart, a Certified Residential Real Estate Appraiser. The intended use of the ad valorem appraisal report was to determine the fair cash value for a real estate tax appeal.

The appraiser described the subject as being vacant for many years and not habitable, and that the well, septic sewer system and heat source were either in need of repair or were absent. Also, due to the subject's code violations and the poor condition, location on the lot, the subject home was a tear down and it was given no value. On Page 1 of the addendum the appraiser reports that the subject's present use, an improved residential lot, is the highest and best use of the subject property site. The appraiser states "the lot size, shape and land-to-building ratio allow the present structure and indicate a good utilization of the improvements. The market indicates the present improvements are physically possible, legally permissible, and financially feasible. Therefore, it is clear from this market evidence the present improvements are the highest and best use of the site as improved". The appraiser also noted that due to lack of sale activity within a mile of the subject property, the appraiser extended the search to 1.5 miles. The appraiser reported the comparable sales used in the appraisal were the most overall similar sales.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value selecting five comparable sales located within 1.85 miles of the subject property. The comparables have sites that range in size from 5,663 to 58,919 square feet of land area, three of which are are improved with 1-story or 2-story dwellings of average quality construction that range in size from 880 to 1,431 square feet of living area. The homes are 61 to 100 years old. One comparable has 1-car garage. Comparables #1 through #3 sold in July to October 2024 for prices ranging from $175,000 to $234,900 or from $122.29 to $266.93 per square foot of living area, land included. Comparable #4 has a dwelling that was considered a tear down and no dwelling size was noted. Comparable #5 is a vacant land sale. Comparables #4 and #5 sold in August and November 2024 for $61,000 and $140,000 or $2.38 and $2.80 per square foot of land area.

The appraiser adjusted the comparables for differences with the subject in location, site size, condition, dwelling size, finished basement area, heating/cooling, and fireplace counts arriving at adjusted prices ranging from $84,100 to $118,000 and an opinion of market value for the subject of $100,000.

Based on this evidence, the appellant requested the subject's assessment be reduced to $33,330 which equates to a market value of $100,000 or $66.31 per square foot of living area, land included.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $77,319. The subject's assessment reflects a market value of $231,980 or $153.83 per square foot of living area, including land.

In support of its contention of the correct assessment the board of review submitted information on four comparables located within approximately 2.06 miles from the subject property. The comparables have sites that range in size from 6,400 to 15,934 square feet of land area. Comparables #1 through #3 are improved with 1-story dwellings of frame exterior construction that range in size from 840 to 1,589 square feet of living area. The homes were built from 1951

to 1954. Two comparables have a basement, one comparable has central air conditioning, and one comparable has a fireplace. Each comparable has a garage ranging in size from 294 to 484 square feet of building area. Comparables #1 through #3 sold in October 2024 or June 2025 for prices ranging from $160,000 to $245,000 or from $141.60 to $190.48 per square foot of living area, land included. Comparable #4 is a vacant land sale with no improvements. Comparable #4 sold in April 2025 for $80,000 or $12.50 per square foot of land area.

The board of review also submitted Multiple Listing Service sheets (MLS) for the board of review's four comparables. Comparable #1 was described as "The House Needs Repair", material defects in the foundation, walls, windows, doors or floors, recurring leakage problems in the crawl space, and sold "As Is". Comparable #2 was described as a property brimming with potential, ideal for investors, rehabbers or ambitious buyers looking to create their dream home from the ground up. Comparable #3 was described as a fantastic opportunity for those with a vision, with some TLC, you can transform this property, "NEEDS a LOT of work, and "Price way under mkt value due to updates needed". Based on this evidence, the board of review requests the subject's assessment be confirmed.

In response to the appellant's appraisal evidence, the board of review, through the Ela Township Assessor's Office, submitted written comments asserting the appraisal is fundamentally flawed, internally inconsistent, and not compliant with the Uniform Standards of Professional Appraisal Practice (USPAP). The board of review contends the internal contradictions in highest and best use, valuation methodology concluding the improvements have no value, yet relying on improved sales and the adjustments exceeding 90-100% call into question the appraiser's credibility. The board of review asserted the appraiser failed to develop land value, despite concluding the property is a tear-down. The Ela Township Assessor also argued they verified directly with the Village of Lake Zurich that there are no active code violations for the subject property which contradicts statements made by the appraiser. The assessor's market evidence consists of three properties in poor condition and one vacant land sale which reflect actual market behavior and required minimal, supportable adjustments. Lastly, the board of review, argued that the appellant's comparables are not reliable due to the adjustments exceeding 90-100%, which suggest they are not truly comparable.

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 a reduction in the subject's assessment is not warranted based upon the evidence in the record.

The appellant submitted an appraisal and the board of review submitted four comparable sales for the Board's consideration.

As to the appellant's appraisal, the Board finds the appraiser states the highest and best use of the subject property is its current use as an improved residential dwelling. The appraiser also states "the subject property is considered a tear down and given no value" and develops an opinion of

value based on land only. Highest and best use of a property, for the purposes of an appraisal, indicates the use of a parcel of land which provides the highest financial return. Sales of improved property which will have the improvements razed suggest those parcels have a highest and best use as vacant land. As a result of the appraiser's conflicting highest and best use of the subject, as improved, giving the subject dwelling no value and developing the opinion of value for the subject as vacant land, the Board finds the appraiser's opinion of value is less credible or reliable and gives no weight to the opinion of value contained in the appraisal. Nevertheless, the Board will look at the raw sales data.

The Board gives less weight to the appraisal comparables and the board of review's comparable #4 which are less similar to the subject in age, condition, unknown dwelling size and/or is vacant land with no structure.

The Board finds the best evidence of market value to be the board of review's comparables #1, #2 and #3 which are similar to the subject in poor condition. These properties sold from October 2024 to June 2025 for prices of $160,000 to $245,000. The subject's assessment reflects a market value of $231,980 which is within the range established by the best comparable sales in the record. After considering adjustments to the comparables for differences with the subject, 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:

C E R T I F I C A T I O N

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: October 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 9-215 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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