



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

APPELLANT: David Pepping  
DOCKET NO.: 21-01244.001-R-1  
PARCEL NO.: 11-16-422-017

The parties of record before the Property Tax Appeal Board are David Pepping, the appellant, by attorney Gregory Riggs of Tax Appeals Lake County in Lake Zurich; 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:** \$75,682  
**IMPR.:** \$212,467  
**TOTAL:** \$288,149

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 2021 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 two-story dwelling of frame exterior construction with 3,186 square feet of living area. The dwelling was constructed in 2016. Features of the home include a basement, central air conditioning, a fireplace and a 528 square foot garage. The property has a 7,500 square foot site and is located in Libertyville, Libertyville 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 sales that are located within .65 of mile from the subject property, two of which have the same assessment neighborhood code as the subject. The comparables have sites that range in size from 6,700 to 7,801 square feet of land area. The comparables are improved two-story dwellings of frame exterior construction ranging in size from 2,930 to 3,220 square feet of living area. The dwellings were built from 1905 to 2017 with comparable #3 having a reported effective age of 1984. Each comparable has a

basement, central air conditioning, either one or five fireplaces and a garage ranging in size from 440 to 533 square feet of building area. The comparables sold from February to December 2020 for prices ranging from \$640,000 to \$690,000 or from \$214.24 to \$218.43 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$288,149. The subject's assessment reflects a market value of \$866,614 or \$272.01 per square foot of living area, land included, when using the 2021 three-year average median level of assessment for Lake County of 33.25% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on five comparable sales that are located within .61 of a mile from the subject property, one of which has the same assessment neighborhood code as the subject. The comparables have sites that range in size from 5,334 to 16,383 square feet of land area. The comparables are improved with two-story dwellings of frame exterior construction ranging in size from 2,590 to 3,746 square feet of living area. The dwellings were built from 2013 to 2019 with comparable #3 built in 2018 having a reported effective age of 2013. Each comparable has a basement, central air conditioning, one or two fireplaces and a garage ranging in size from 484 to 692 square feet of building area. The comparables sold from June 2019 to November 2020 for prices ranging from \$849,000 to \$1,200,000 or from \$284.14 to \$400.67 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

The board of review contends the subject's current assessment reflects a market value that is 18% below its 2017 purchase price of \$1,045,5000, which is reported in the subject's property record card that is included with the submission.

### **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 record contains eight suggested comparable sales for the Board's consideration. The Board have given less weight to the appellant's comparable #3 and board of review comparables #2 and #3 due to differences from the subject in age or dwelling size. Furthermore, board of review comparable #2 has a sale date that occurred 18 months prior to the assessment date issue and is thus less likely to be indicative of the subject's market value as of January 1, 2021. The Board has also given less weight to board of review comparable #1 which appears to be an outlier due to its significantly higher sale price of \$1,200,000 or \$400.67 per square foot of living area, including land, when compared to the other sales in the record.

The Board finds the best evidence of market value to be the appellant's comparables #1 and #2, along with board of review comparables #4 and #5, which sold proximate in time to the assessment date at issue, are relatively similar to the subject in location and overall, more similar to the subject in dwelling size, design, age and some features. These four comparables sold from February to December 2020 for prices ranging from \$680,000 to \$900,000 or from \$214.24 to \$296.44 per square foot of living area, including land. The subject's assessment reflects a market value of \$866,614 or \$272.01 per square foot of living area, including land, which falls within the range established by the best comparable sales in the record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds no reduction in the subject's assessment is warranted.

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:

September 19, 2023



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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