



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

APPELLANT: Jatin & Kaushika Patel  
DOCKET NO.: 21-03666.001-R-1  
PARCEL NO.: 06-08-203-043

The parties of record before the Property Tax Appeal Board are Jatin & Kaushika Patel, the appellants, by Jessica Hill-Magiera, Attorney at Law 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:** \$15,605  
**IMPR.:** \$80,552  
**TOTAL:** \$96,157

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 1-story dwelling of wood siding exterior construction with 1,976 square feet of living area. The dwelling was constructed in 1996. Features of the home include a walkout basement with finished area,<sup>1</sup> central air conditioning, a fireplace and a 420 square foot garage. The property has a 21,780 square foot site and is located in Lake Villa, Lake Villa Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted information on three comparable sales located from 0.74 to 0.94 of a mile from the subject. The parcels range in size from 10,019 to 16,553 square feet of land area and

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<sup>1</sup> The parties differ regarding the subject's basement finish. The Board finds the best evidence of basement finish is found in the subject's property record card presented by the board of review which was not refuted by the appellants in written rebuttal.

are improved with 1-story homes of wood siding exterior construction ranging in size from 1,840 to 1,950 square feet of living area. The dwellings were built in 1987 or 1997. Each home has a basement, central air conditioning, and a garage ranging in size from 400 to 484 square feet of building area. Two homes each have a fireplace. The comparables sold from May to August 2020 for prices ranging from \$230,000 to \$255,000 or from \$124.10 to \$131.31 per square foot of living area, including land. Based on this evidence the appellants 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 \$96,157. The subject's assessment reflects a market value of \$289,194 or \$146.35 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 three comparable sales located from 0.07 of a mile to 1.79 miles from the subject. The comparables have 10,890 or 11,760 square foot sites that are improved with 1-story homes of wood siding exterior construction ranging in size from 1,694 to 1,976 square feet of living area. The dwellings were built from 1995 to 2001. Each home has a basement with finished area, two of which are walkout basements, central air conditioning, and a garage ranging in size from 420 to 641 square feet of building area. One home has a fireplace. The comparables sold from January 2020 to November 2021 for prices ranging from \$287,000 to \$291,000 or from \$146.76 to \$171.78 per square foot of living area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellants argued the board of review's comparable #3 is not similar to the subject in dwelling size and is located almost two miles from the subject.

### **Conclusion of Law**

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains a total of six comparable sales for the Board's consideration. The Board gives less weight to the appellants' comparables, due to substantial differences from the subject in age and/or basement finish. The Board also gives less weight to the board of review's comparable #3, which is located more than one mile from the subject and is a substantially smaller home than the subject.

The Board finds the best evidence of market value to be the board of review's comparables #1 and #2, which are similar to the subject in dwelling size, age, location, and features, although these comparables have smaller lots than the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These two most

similar comparables sold for prices of \$287,000 and \$290,000 or for \$147.79 and \$146.76 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$289,194 or \$146.35 per square foot of living area, including land, which is bracketed by the best comparable sales in terms of total market value and below the best comparables on a price per square foot basis. Based on this evidence and after considering appropriate 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.

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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APPELLANT

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COUNTY

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