



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

APPELLANT: Grace Moon
DOCKET NO.: 21-03677.001-R-1
PARCEL NO.: 16-11-102-004

The parties of record before the Property Tax Appeal Board are Grace Moon, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Lake Forest; 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: \$61,863
IMPR.: \$339,642
TOTAL: \$401,505

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 3-story dwelling of brick exterior construction with 7,941 square feet of living area.¹ The dwelling was constructed in 1892, is approximately 129 years old, and has an effective age of 1995. Features of the home include a basement with finished area, central air conditioning, four fireplace, and a 1,040 square foot 3-car garage. The property has a 12,632 square foot site and is located in Highland Park, Moraine 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

¹ The parties differ regarding the subject's dwelling size. The Board finds the best evidence of dwelling size is found in the appellant's appraisal which contains a sketch with more precise measurements of the subject home than the sketch with measurements contained in the subject's property record card presented by the board of review. However, the Board finds the difference in dwelling size between the parties of 13 square feet to be minimal.

\$1,164,000 as of February 19, 2021. The appraisal was prepared by Jeffrey J. Chester, a certified residential real estate appraiser, for a mortgage refinance transaction.

Under the sales comparison approach, the appraiser selected six comparable sales located from 0.04 of a mile to 2.80 miles from the subject.² The appraiser stated that few recent sales of comparable properties were found in the subject's immediate area so it was necessary to select older sales and/or comparables located more than one mile from the subject. The comparables have sites ranging in size from 7,405 to 21,000 square feet of land and are improved with 2-story or 3-story homes ranging in size from 5,344 to 7,134 square feet of living area. The dwellings range in age from 19 to 133 years old. Each home has a basement, four of which have finished area, central air conditioning, two to four fireplaces, and from a 2-car to a 4-car garage. Comparable #5 has an elevator and comparable #6 has an inground swimming pool. The comparables sold from June 2018 to January 2021 for prices ranging from \$970,000 to \$1,155,000 or \$135.97 to \$239.63 per square foot of living area, including land.

The appraiser made adjustments to the comparables for differences from the subject, including location, view, site size, quality of construction, room count, dwelling size, basement size and finish, garage size, fireplace count, and other improvements, to arrive at adjusted sale prices ranging from \$1,131,000 to \$1,187,000. The appraiser stated the subject home had been recently completely rehabbed and renovated "down to brick." The appraiser explained no adjustments for age were made to the comparables due to their similarity to the subject in effective age. Based on the foregoing, the appraiser concluded a value of \$1,164,000 for the subject as of February 19, 2021.

Based on this evidence the appellant requested a reduction in the subject's assessment to \$387,764 which would reflect a market value of \$1,163,408 or \$146.51 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 \$401,505. The subject's assessment reflects a market value of \$1,207,534 or \$152.06 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 located from 0.26 of a mile to 1.77 miles from the subject. The parcels range in size from 18,730 to 68,390 square feet of land area and are improved with 2-story or 2.5-story homes of brick, wood siding, brick and stucco, or wood siding and stucco exterior construction. The homes range in size from 6,447 to 8,447 square feet of living area that were built from 1892 to 2006, with comparables #3 and #4 having effective ages of 1993 and 1936, respectively. Each home has a basement, four of which have finished area and one of which is a walkout basement. Each comparable also features central air conditioning, three or five fireplaces, and a garage ranging in size from 770 to 954 square feet of building area.

² The appraiser also selected a listing as comparable #7 but stated in the appraisal report that this listing was given no weight in determining the value conclusion for the subject. Thus, the Board shall not further consider this comparable as it was not a basis for the appraiser's opinion of value.

Comparable #5 is reported to have a second 21 square foot garage and an inground swimming pool. The comparables sold from April 2020 to November 2021 for prices ranging from \$1,395,000 to \$2,650,000 or from \$189.90 to \$340.66 per square foot of living area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

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 presented an appraisal and the board of review presented five comparable sales in support of their respective positions before the Board. The Board gives less weight to the appraisal, which relies on three older sales and three comparables located more than two miles from the subject where more sales more proximate in time to the assessment date, more proximate in location to the subject, and more similar to the subject in dwelling size (as presented by the board of review) were available. Thus, the Board finds the value conclusion contained in the appraisal to be a less credible and/or reliable opinion of value and the Board will instead consider the raw sales data presented in the appraisal and by the board of review.

The record contains a total of eleven comparable sales for the Board's consideration. The Board gives less weight to appraisal comparables, due to substantial differences from the subject in dwelling size and/or which sold less proximate in time to the assessment date than the other comparables in this record. Moreover, three of these comparables are located more than two miles from the subject. The Board also gives less weight to the board of review's comparables #4 and #5, due to substantial differences from the subject in lot size and/or inground swimming pool amenity.

The Board finds the best evidence of market value to be the board of review's comparables #1, #2, and #3, which sold more proximate in time to the assessment date and are more similar to the subject in dwelling size, effective age, location, site size, and features. These most similar comparables sold for prices ranging from \$1,395,000 to \$2,085,000 or from \$189.90 to \$298.59 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,207,534 or \$152.06 per square foot of living area, including land, which is below 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.

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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