



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

APPELLANT: Nat & Peggy Shapiro  
DOCKET NO.: 12-02626.001-R-1  
PARCEL NO.: 15-30-407-027

The parties of record before the Property Tax Appeal Board are Nat & Peggy Shapiro, the appellants, by attorney Jerri K. Bush, in Chicago; and the Lake County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds a reduction 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:** \$26,865  
**IMPR.:** \$44,395  
**TOTAL:** \$71,260

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 2012 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 frame dwelling that has 1,572 square feet of living area. The dwelling was constructed in 1978. Features include an unfinished basement, central air conditioning, a fireplace and an attached 575 square foot garage. The subject property has 7,777 square feet of land

area. The subject property is located in Vernon Township, Lake County.

The appellants submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. In support of this argument, the appellants submitted a limited market analysis prepared by ProTaxAppeal that was dated March 26, 2013. The report was not signed nor were the credentials of the person(s) who prepared the report disclosed. The analysis was comprised of four suggested comparable sales located in close proximity to the subject. The analysis did not disclose the comparables' land size or exterior construction. The comparables sold from December 2010 to December 2011 for prices ranging from \$185,000 to \$240,000 or from \$109.85 to \$129.87 per square foot of living area including land. The analysis included adjustments to the comparables for sale date, land area, age, size, basement area, finished basement area, and garage space. At the bottom of the analysis, data sources were listed as Assessor, MLS, Realist, Marshall & Swift and IRPAM. No evidence or explanation pertaining to the calculation of the adjustment amounts was submitted.

Based on the comparables' adjusted sales prices, the appellants requested the subject's assessment be reduced to reflect a market value of \$182,656 or an assessment of \$60,879.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$91,259. The subject's assessment reflects an estimated market value of \$278,908 or \$177.42 per square foot of living area including land when applying the 2012 three-year average median level of assessment for Lake County of 32.72%.

In support of the subject's assessment, the board of review submitted three comparable sales located in close proximity to the subject. The comparables had varying degrees of similarity when compared to the subject. The comparables sold from July 2011 to March 2013 for prices ranging from \$262,000 to \$335,000 or from \$162.37 to \$168.51 per square foot of living area including land. Based on this evidence, the board of review proposed to reduce the subject's assessment to \$87,325, which reflects an estimated market value of \$261,975 or \$166.65 per square foot of living area including land.

The appellant rejected the proposed assessment reduction.

**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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted seven suggested comparable sales for the Board's consideration. The Board gave less weight to appellants' comparables #3 and #4 as well as board of review comparables #2 and #3 due to their larger dwelling sizes when compared to the subject. Additionally, board of review comparable #3 sold in March 2013, which is over one after the subject's January 1, 2013 assessment date. The Board finds the best indicators of the subject's market value are the appellants' comparables #1 and #2 and board of review comparable #1. These comparables were similar if not identical to the subject in location, age, design, size and features. These most similar comparables sold for prices ranging from \$185,000 to \$262,000 or from \$117.68 to \$166.67 per square foot of living area including land. The subject's assessment reflects a market value of \$278,908 or \$177.42 per square foot of living area including land, which falls above the range established by the most similar comparable sales contained in this record. As a result, the Board finds a reduction in the subject's assessment is 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.

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Chairman



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Member



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Member

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Member



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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: May 22, 2015



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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 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 the subsequent year 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.

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.