



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

APPELLANT: Anthony Castellano  
DOCKET NO.: 19-03015.001-R-1  
PARCEL NO.: 07-27-403-013

The parties of record before the Property Tax Appeal Board are Anthony Castellano, 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:** \$18,259  
**IMPR.:** \$149,437  
**TOTAL:** \$167,696

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 2019 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 1.5-story dwelling of frame exterior construction with 2,871 square feet of living area. The dwelling was constructed in 2016. Features include a basement with that is 90% finished, central air conditioning, a fireplace and a 483 square foot two-car garage.<sup>1</sup> The subject property has a 5,400 square foot site and is located in Libertyville, Warren 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 located over 1.5 miles from the subject. The comparables consist of a 1-story, a 1.5-story and a 2-story dwelling of wood siding exterior construction that were built from 1992 to 2015. The dwellings range in size from 2,370

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<sup>1</sup> The Board finds the best evidence for the description of subject was found in the appraisal submitted by the appellant.

to 3,631 square feet of living area and are situated on sites that range in size from 9,710 to 12,200 square feet of land area. The comparables have basements, with two having recreation rooms. Other features of each comparable include central air conditioning, one or two fireplaces, and a garage ranging in size from 420 to 598 square feet of building area.. The comparables sold from March 2018 to May 2019 for prices ranging from \$343,500 to \$580,000 or from \$125.92 to \$172.57 per square foot of living area, including land.

In further support, the appellant submitted an appraisal estimating the subject property had a market value of \$450,000 as of September 12, 2019. The appraisal was prepared by Ronald C. Brandt, State of Illinois Certified General Real Estate Appraiser. The appraiser described the subject as being a builder model home that is in good condition and was finished with high quality materials and fixtures. The subject also has a finished basement with recreation room, wet bar, exercise room, bedroom, and half bath. The appraiser developed the sales comparison approach to value using four comparable sales and one comparable listing located from .07 of a mile to 1.77 miles from the subject. The comparables are described as three, one-story ranch and two, two-story dwellings ranging in size from 1,841 to 3,047 square feet of living area. The properties range in age from new to 23 years old and are situated on sites ranging in size from 5,400 to 13,504 square feet of land area. The comparables have basements with finished area, central air conditioning and two-car or three-car garages. Four comparables each have a fireplace. Comparables #1 through #4 sold from April to August 2019 for prices ranging from \$409,000 to \$455,000 or from \$151.10 to \$239.00 per square foot of living area, including land. Comparable #5 has a list price of \$439,900 or \$197.35 per square foot of living area, including land. The appraiser adjusted the comparables for location, site, quality of construction, age, condition, room count, gross living area, basement size and finished rooms below grade and other features. After applying adjustments to the comparables for differences from the subject, the comparables had adjusted prices ranging from \$435,500 to \$494,900. Based on the adjusted sales, the appraiser estimated the subject had a market value of \$450,000 or \$156.74 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 \$167,696. The subject's assessment reflects an estimated market value of \$509,869 or \$179.46 per square foot of living area, including land, when applying the 2019 three-year average median level of assessment for Lake County of 32.89%.

In support of the subject's assessment, the board of review submitted information on four comparable sales located within the .08 of a mile from the subject and within the same neighborhood as the subject. The comparables consist of one-story dwellings of wood siding exterior construction that were built in 2017 or 2018. The dwellings range in size from 2,030 to 2,508 square feet of living area and each is situated on a site with 5,400 square feet of land area. The comparables have basements with recreation rooms and one also has a walk-out. The comparables feature central air conditioning and garages ranging in size from 462 to 572 square feet of building area. Three comparables each have one or two fireplaces. The comparables sold from February 2018 to June 2019 for prices ranging from \$365,000 to \$715,538 or from \$172.45 to \$294.95 per square foot of living area, including land. The board of review's evidence also

disclosed the subject property sold for \$499,000 in January 2017. 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 submitted three comparable sales and an appraisal of the subject property while the board of review provided four comparable sales for the Board's consideration. The Board gives less weight to the value conclusion in the appellant's appraisal as the appraiser utilized four comparable sales located over 1.4 miles from the subject with considerably larger sites, two were significantly older dwellings, and one was a listing that has not yet sold when other sales within the subject's neighborhood were available. The Board also gave less weight to the three comparable sales submitted by the appellant as all are located over 1.5 miles from the subject property.

The Board finds the best evidence of market value to be the board of review comparables which are most similar to the subject in location and have the same lot size as the subject. The comparables sold from February 2018 to June 2019 for prices ranging from \$365,000 to \$715,538 or from \$172.45 to \$294.95 per square foot of living area, including land. However, board of review comparable #4 appears to be an outlier as it sold considerably higher than the best sales in the record. The remaining three comparables sold from \$365,000 to \$432,500 or from \$172.45 to \$184.82 per square foot of living area, including land. However, each comparable has a smaller dwelling size that requires an upward adjustment to make them more equivalent to the subject. The subject's assessment reflects an estimated market value of \$509,869 or \$179.46 per square foot of living area, including land, which falls within the range on a square foot basis established by the best comparable sales in this record but above on overall price. The higher overall price is justified when considering the subject's larger dwelling size and the subject's high quality of materials and fixtures as noted in the appellant's appraisal. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported and 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:

December 21, 2021



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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Anthony Castellano, by attorney:  
Gregory Riggs  
Tax Appeals Lake County  
830 West IL Route 22  
Suite 286  
Lake Zurich, IL 60047

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085