



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

APPELLANT: Angelo Roncone
DOCKET NO.: 19-08792.001-R-1
PARCEL NO.: 06-02-104-010

The parties of record before the Property Tax Appeal Board are Angelo Roncone, the appellant, by attorney Robert Rosenfeld of Robert H. Rosenfeld and Associates, LLC in Chicago; and the Lake County Board of Review.

Based on the facts and exhibits presented in this matter, 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: \$8,548
IMPR.: \$51,510
TOTAL: \$60,058

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 one-story dwelling of wood siding exterior construction with 1,494 square feet of living area. The dwelling was constructed in 1993 and is approximately 26 years old. Features of the home include an unfinished basement, central air conditioning, one full bath, a fireplace, a 480 square foot garage and a metal utility shed. The property has a 10,010 square foot site and is located in Lindenhurst, Lake Villa 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 with the same assessment neighborhood code as the subject and located within .88 of a mile from the subject property. The comparables have sites that range in size from 10,130 to 11,370 square feet of land area. The comparables are improved with one-story dwellings of wood siding exterior construction ranging in size from 1,386 to 1,659 square feet of living area. The dwellings are 43 or 44 years old. The

comparables each comparable have a basement, two of which are finished with a recreation room. Each comparable has central air conditioning, two or three full baths and a garage ranging in size from 462 to 572 square feet of building area. Two comparable have one half bath and two comparables have either one or two fireplaces. The properties sold from December 2016 to June 2019 for prices ranging from \$163,500 to \$210,000 or from \$98.56 to \$132.03 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$60,058, which would reflect a market value of \$180,192 or \$120.61 per square foot of living area, including land, when using 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 \$67,223. The subject's assessment reflects a market value of \$204,387 or \$136.81 per square foot of living area, land included, when using the 2019 three-year average median level of assessment for Lake County of 32.89% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales with the same assessment neighborhood code as the subject and located within .56 of a mile from the subject property. The comparables have sites that range in size from 9,010 to 10,080 square feet of land area and are improved with one-story dwellings of brick or wood siding exterior construction ranging in size from 1,008 to 1,032 square feet of living area. The dwellings were built from 1954 to 1965. The comparables each have a basement, two of which are finished with a recreation room. Each comparable has either one or two full baths and a garage ranging in size from 240 to 504 square feet of building area. Three comparables have central air conditioning. The properties sold from April 2017 to March 2019 for prices ranging from \$147,000 to \$211,000 or from \$142.44 to \$209.33 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 evidence in the record supports a reduction in the subject's assessment.

The record contains a total of seven suggested comparable sales for the Board's consideration. However, the Board finds none of these comparables are truly similar to the subject due to significant differences in age, dwelling size and/or features. The Board has given less weight to the appellant's comparable #2 and board of review comparable #4 due to their sale dates occurring in 2016 and 2017 which are dated and less likely to be reflective of market value as of January 1, 2019. The Board has given reduced weight to board of review comparables #1 through #3 due to the dwellings being from 28 to 39 years older than the subject and all are considerably smaller in size. Furthermore, the board of review's comparable #1 has no central air conditioning, a feature of the subject.

The Board finds the best evidence of market value to be the appellant's comparables #1 and #3, which sold proximate in time to the assessment date at issue and are overall more similar to the subject in location, dwelling size, design and some features. However, both dwellings have two full baths and one half bath, in contrast the subject dwelling with one full bath and the appellant's comparable #2 has a finished basement unlike the subject, suggesting downward adjustments would be required for these features to make the comparables more equivalent to the subject. In addition, both comparables are 18 years older than the subject, suggesting an upward adjustment for age would be required. Nevertheless, these two properties sold in October 2018 and June 2019 for prices of \$163,500 and \$183,000 or for \$98.56 and \$132.03 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$204,387 or \$136.81 per square foot of living area, including land, which falls above the two most similar comparables in the record both in terms of overall market value and on a price per square foot basis. After considering adjustments to the comparable for differences in age and other features when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is excessive. Therefore, based on this record, the Board finds a reduction in the subject's assessment commensurate with the appellant's request 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: June 21, 2022



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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