



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

APPELLANT: Lori Rinaldo  
DOCKET NO.: 20-01554.001-R-1  
PARCEL NO.: 08-03-303-005

The parties of record before the Property Tax Appeal Board are Lori Rinaldo, the appellant, and the Winnebago 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 **Winnebago** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$14,392  
**IMPR.:** \$71,744  
**TOTAL:** \$86,136

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Winnebago County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2020 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 part one-story and part two-story single-family dwelling of brick and vinyl siding exterior construction with 2,500 square feet of living area. The dwelling was constructed in 2007 and is 13 years old. Features of the home include a basement with 900 square feet of finished area, central air conditioning, a fireplace, and an attached three-car garage containing 836 square feet of building area. The property has a 14,074 square foot site and is located in Roscoe, Harlem Township, Winnebago County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales in the Section V grid analysis along with a three-page brief and supporting exhibits. In the brief, the appellant argued an increase in the subject's valuation of nearly \$95,000 since its purchase five years previously is not justified since no improvements have been made. For perspective, the appellant reports in 2013, a previous owner, finished the subject's basement for less than \$30,000, and thereafter in November 2015, the

appellant purchased the property for \$251,500. In further support of the appellant's arguments, she submitted seven exhibits: 2017 to 2020 historical data regarding increased tax bills and increased assessments for the subject property (Appellant's Exhibit A)<sup>1</sup>; a new mortgage escrow statement effective December 1, 2020 (Appellant's Exhibit B); a map of properties sold in the subject's subdivision from 2017 - 2020 along with sales price data where no sale exceeds \$275,000 (Appellant's Exhibit C)<sup>2</sup>; a printout of a nearby property offered for sale in August 2020 for \$289,950 and then reduced to an asking price of \$275,000 (Appellant's Exhibit D)<sup>3</sup>; and historical data regarding the sales prices of the subject property from 2008 through 2015 along with the subject's reported real estate taxes from 2008 to 2019 (Appellant's Exhibit F).

As set forth in the grid analysis, the appellant's four comparable sales are located from 2 blocks to 2 miles from the subject property. The comparables have sites ranging in size from 15,682 square to 24,404 square feet of land area. The parcels are each improved with a two-story dwelling of brick and siding exterior construction ranging in size from 2,128 to 2,624 square feet of living area.<sup>4</sup> The dwellings are from 14 to 19 years old. Each home has a basement, three of which have recreation rooms, including a bedroom and/or office and two of which also each have a bathroom. Comparable #1 has a walkout-style basement. Each home features central air conditioning, one or two fireplaces, and a three-car garage. The comparables sold from April 2019 to May 2020 for prices ranging from \$245,000 to \$270,000 or from \$100.99 to \$126.88 per square foot of living area, including land.

Based on this evidence and argument, the appellant requested a total assessment of \$86,136, which would reflect a market value of \$258,434 or \$103.37 per square foot of living area, including land, at 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 \$100,616. The subject's assessment reflects a market value of \$301,878 or \$120.75 per square foot of living area, land included, when using the 2020 three year average median level of assessment for Winnebago County of 33.33% as determined by the Illinois Department of Revenue.

In response to the appellant's appeal, the board of review provided a memorandum prepared by Thomas Ewing and a memorandum of the township assessor. Both documents contend one of the appellant's comparable sales is not located within Harlem Township. It is also summarily asserted that the comparable sales supplied by the township assessor support the subject's assessment.

In support of the subject's assessment, the board of review submitted information on three comparable sales, where the board of review comparable #3 is the same property as the appellant's

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<sup>1</sup> The 2017 tax bill depicts the last of the four-year home improvement exemption of \$7,294 applied to the subject.

<sup>2</sup> Appellant's Exhibit C lacks specific address data, dates of sale and/or any information regarding the features and amenities of these properties. While this information has not been examined as additional comparable sales information for analysis, the exhibit depicts sale prices ranging from \$200,000 to \$275,000.

<sup>3</sup> Appellant's Exhibit D depicts the dwelling as having a lower level with a recreation room and a fireplace.

<sup>4</sup> The parties differ regarding the dwelling size of the appellant's comparable #4, which is the same property as the board of review's comparable #3. The appellant apparently relied upon a listing by a realtor, instead of the printout from the assessing officials which the appellant also supplied depicting a "gross area square foot" of 2,128 square feet and which the Board finds to be the best evidence of this property's dwelling size

comparable #4. The grid analysis fails to provide the lot sizes of the comparables and/or their proximity to the subject property, although two properties are on the same street as the subject. The comparables are each improved with a two-story dwelling of brick and vinyl siding exterior construction ranging in size from 2,128 to 2,430 square feet of living area. The dwellings were built in either 2005 or 2006. As described, the homes each have an unfinished basement,<sup>5</sup> central air conditioning, one fireplace, and a garage ranging in size from 504 to 792 square feet of building area. Comparable #2 has an inground pool. The comparables sold from December 2019 to July 2020 for prices ranging from \$270,000 to \$310,000 or from \$123.65 to \$127.57 per square foot of building area, including land. Based on the foregoing evidence and argument, the board of review requested confirmation of the subject's assessment.

In a written rebuttal dated July 26, 2021, the appellant contends that the board of review's comparables #1 and #2 feature amenities which the subject does not have, including a walkout-style basement, more bedrooms and bathrooms, and/or an inground pool. The appellant further asserts that the board of review's comparable #3/appellant's comparable #4 is similar to the subject and the subject should be valued in a similar manner to this comparable. The appellant stated that the fair market value of the subject has not substantially increased since the appellant purchased the subject property in 2015. Finally, the appellant objected to the board of review's consideration of comparable sales which the appellant considers to be outliers.

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

The record contains a total of six comparable sales, with one common property, for the Board's consideration.<sup>6</sup> The Board gives less weight to the appellant's comparable #3, which is reported to be located two miles from the subject when compared to other comparables more proximate to the subject property. The Board also gives reduced weight to board of review comparable #2, due to its inground pool amenity which is not a feature of the subject property.

Consequently, on this record, the Property Tax Appeal Board finds the best evidence of market value to be the appellant's comparables #1 and #2, the appellant's comparable #4/board of review's comparable #3, and board of review comparable #1, which are each relatively similar to the subject in dwelling size, age, location and some features, although the Board recognizes that downward

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<sup>5</sup> In rebuttal, the appellant reports that board of review comparable #1 has a walkout-style basement which is not depicted in the board of review's submission.

<sup>6</sup> As an aside, the Board did not consider the additional properties in Appellant's Exhibits C and D as the submission provided inadequate information about the dates of sale along with features and/or amenities of such those properties. In order for the Board to properly evaluate comparables, it is necessary to be provided with the salient features and amenities of the comparables along with specific sales data, so the Board may conduct a meaningful analysis of the comparability and/or similarity of the properties to the subject along with consideration of possible necessary adjustments to make them more equivalent to the subject property.

adjustments would be necessary for appellant's comparable #1 and board of review comparable #1 which reportedly have walkout-style basements as compared to the subject's standard basement. These four most similar comparables sold from April 2019 to July 2020 for prices ranging from \$259,900 to \$275,000 or from \$100.99 to \$126.88 per square foot of living area, including land.

Furthermore, the subject is a larger dwelling than all but the appellant's comparable #2. Accepted real estate valuation theory provides that all factors being equal, as the size of the property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. Therefore, giving due consideration to the principle of the economies of scale, the subject's value should fall on the lower-end of the range of sales prices per square foot given its larger dwelling size.

The subject's assessment reflects a market value of \$301,878 or \$120.75 per square foot of living area, including land, which is above the range established by the best comparable sales in terms of overall value but within the range on a per square foot basis. However, the Board finds that the subject's assessment does not appear to be justified after considering appropriate adjustments to the best comparables for differences, such as a walkout-style basement and dwelling size.

Based on the foregoing evidence and after thorough analysis of the entire record, including the lack of detailed property records that should have been provided by the board of review, the Property Tax Appeal Board finds that 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:

February 15, 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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