



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

APPELLANT: James Ceriale
DOCKET NO.: 21-00920.001-R-1
PARCEL NO.: 11-14-401-015

The parties of record before the Property Tax Appeal Board are James Ceriale, the appellant, by attorney Eric Feldman, of Eric Feldman & Assoc. P.C. 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 **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: \$ 64,254
IMPR.: \$122,119
TOTAL: \$186,373

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 two-story dwelling of brick exterior construction with 3,543 square feet of living area. The dwelling was constructed in 1978 and has a reported effective age of 1980. Features of the home include a full basement, central air conditioning, a fireplace and a 1,066 square foot garage. The property is located in Green Oaks, Libertyville Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on five comparable sales located in the same assessment neighborhood code as the subject and from .19 to .41 of a mile from the subject. The

comparable parcels are each improved with either a one-story¹ or a two-story dwelling of wood siding, brick or brick and wood siding exterior construction. The homes were built from 1972 to 1989. The dwellings range in size from 2,706 to 3,371 square feet of living area. Each comparable has a basement, central air conditioning, one to three fireplaces and a garage ranging in size from 483 to 726 square feet of building area. The comparables sold from January 2020 to January 2021 for prices ranging from \$375,000 to \$550,000 or from \$136.96 to \$163.16 per square foot of living area, including land.

Based on the foregoing evidence, the appellant requested a reduced total assessment of \$160,402 which would reflect a market value of \$481,254 or \$135.83 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 \$186,373. The subject's assessment reflects a market value of \$560,520 or \$158.20 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, where board of review comparables #4 and #5 are the same properties as appellant's comparables #3 and #4, respectively. The comparables are located in the same assessment neighborhood code as the subject and from .17 to .52 of a mile from the subject. The comparable parcels are each improved with either a one-story² or a two-story dwelling of wood siding or brick exterior construction. The homes were built from 1973 to 1989 with comparables #1 and #2 having newer effective ages of 1976 and 1978, respectively. The dwellings range in size from 2,818 to 3,950 square feet of living area. Each comparable has a basement, central air conditioning, one to three fireplaces and a garage ranging in size from 504 to 672 square feet of building area. Comparable #1 also has an inground swimming pool. The comparables sold from January 2020 to September 2021 for prices ranging from \$432,500 to \$795,000 or from \$150.28 to \$202.29 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.

¹ Despite the one-story description of appellant's comparable #5, the Board finds that the dwelling reportedly contains 3,371 square feet of living area and has only 928 square feet of ground floor area, which indicates this dwelling is not only a one-story home.

² Despite the one-story description of board of review comparable #2, the Board finds that the dwelling reportedly contains 3,950 square feet of living area and has only 1,177 square feet of ground floor area, which indicates this dwelling is not only a one-story home.

The parties submitted a total of eight comparable sales, two of which are common to both parties, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #2 due to its smaller dwelling size when compared to the subject's dwelling size. The Board has given reduced weight to board of review comparable #1 due to its inground swimming pool, which is not a feature of the subject property.

The Board finds the best evidence of market value to be appellant's comparable sales #1, #3, #4 and #5 along with board of review comparable sales #2 through #5, which includes the parties' two common properties. These most similar comparables sold from January 2020 to September 2021 for prices ranging from \$410,000 to \$795,000 or from \$143.01 to \$202.29 per square foot of living area, including land. The subject's assessment reflects a market value of \$560,520 or \$158.20 per square foot of living area, including land, which is within the range established by the best comparable sales in this record both in terms of overall value and on a per-square-foot basis. Based on this evidence and after considering appropriate adjustments to the best comparable sales for differences when compared to 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:

August 22, 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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