



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

APPELLANT: Alexander Perrone
DOCKET NO.: 21-01418.001-R-1
PARCEL NO.: 14-18-204-006

The parties of record before the Property Tax Appeal Board are Alexander Perrone, 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: \$15,299
IMPR.: \$95,490
TOTAL: \$110,789

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 one-story dwelling of frame exterior construction with 1,496 square feet of living area.¹ The dwelling was constructed in 1953 and has a reported effective age of 1972. Features of the home include a crawl space foundation, central air conditioning, a fireplace and a 520 square foot attached garage. The property also has a detached two-story garage that was built in 2005, where the first floor is garage area and the second floor has 720 square feet of living area. The property has an approximately 14,260 square foot site and is located in Lake Zurich, Ela Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales that have the same assessment

¹ The parties reported that the subject has a combined total living area of 2,216 square feet, which includes the living area of the subject dwelling and the second floor living area above the detached garage.

neighborhood code as the subject and are located within .29 of mile from the subject property. The comparables have sites that range in size from 9,258 to 12,785 square feet of land area. The comparables are improved with a split-level dwelling or one-story dwellings of frame exterior construction ranging in size from 1,928 to 2,300 square feet of living area. The dwellings were built from 1950 to 1967 with comparables #1 and #2 having reported effective ages of 1978 and 1985, respectively. Comparable #4 has a finished lower level. Each comparable has central air conditioning and either an attached or a detached garage ranging in size from 450 to 656 square feet of building area. The comparables sold from June 2018 to February 2021 for prices ranging from \$285,000 to \$320,000 or from \$128.96 to \$153.01 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 \$110,789. The subject's assessment reflects a market value of \$333,200, 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. Given the dwelling and the second floor area above the detached garage have a combined living area of 2,216 square feet, the subject has a market value of \$150.36 per square foot of living area, including land.

In response to the appellant's evidence, the board of review argued that appellant sale #4 is a split-level, appellant's sale #1 occurred in 2019 and appellant's sale #3 occurred in 2018. The board of review also reiterated that the subject has 720 square of living area above the detached garage.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales that have the same assessment neighborhood code as the subject and are located within .47 of a mile from the subject property. The comparables have sites that range in size from 8,390 to 9,980 square feet of land area. The comparables are improved with two-story dwellings of wood siding exterior construction ranging in size from 1,780 to 2,584 square feet of living area. The dwellings were built from 1979 to 1987. Two comparables each have a basement and two comparables each have a concrete slab foundation. Each comparable has central air conditioning and an attached garage ranging in size from 400 to 644 square feet of building area. Three comparables each have a fireplace. The comparables sold from March 2020 to September 2021 for prices ranging from \$280,000 to \$473,000 or from \$152.34 to \$219.80 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.

The record contains eight suggested comparable sales for the Board's consideration. The Board finds neither party submitted comparables that were truly similar to the subject due to their sale dates occurring less proximate in time to the assessment date at issue and/or due to significant differences from the subject in dwelling size, design, age and/or features. Nonetheless, the Board has given less weight to the appellant's comparables #3 and #4, as comparable #3 has a sale date that occurred 30 months prior to the January 1, 2021 assessment date and comparable #4 is a dissimilar split-level design, when compared to the subject's one-story design. The Board has given reduced weight to the comparables submitted by the board of review due to their dissimilar two-story designs and newer construction ages when compared to the subject dwelling.

The Board finds the appellant's comparables #1 and #2 are similar to the subject in location, design and construction age. However, the appellant's comparable #1 sold 17 months prior to the assessment date at issue and both of these comparables differ from the subject in that they have smaller site sizes and lack a second garage, suggesting adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables sold in July 2019 and October 2020 for prices of \$300,000 and \$320,000 or for \$130.43 and \$150.38 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$333,200 or \$150.36 per square foot of living area, when using the combined living area of the subject dwelling and the second floor area above the detached garage, including land, which is greater than the two more similar comparable sales in the record but appears to be justified given its larger site size and additional garage. Therefore, based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds no reduction in the subject's assessment 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:

November 21, 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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