



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

APPELLANT: Katharine Fiore
DOCKET NO.: 21-02261.001-R-1
PARCEL NO.: 16-04-208-003

The parties of record before the Property Tax Appeal Board are Katharine Fiore, the appellant(s), by attorney Andrew J. Rukavina, of The Tax Appeal Company in Mundelein; 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: \$92,501
IMPR.: \$100,274
TOTAL: \$192,775

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 1.5-story dwelling of brick exterior construction with 1,617 square feet of living area. The dwelling was constructed in 1959. Features of the home include a basement with finished area, central air conditioning, a fireplace and a 264 square foot garage. The property has an approximately 8,940 square foot site and is located in Lake Forest, Moraine 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 neighborhood code as the subject and within 0.13 of a mile from the subject property. The comparables have sites that range in size from 7,950 to 8,990 square feet of land area. The comparables are improved with 1.5-story, 1.75-story or 2-story dwellings of wood siding or brick exterior construction ranging in size from 1,907 to 2,464 square feet of living area that were built from 1940 to 1984 with comparables #2, #3 and #5 having an effective year built of 1966 and 1971, respectively. Each comparable has a basement, four with finished area, a fireplace and a garage ranging in size

from 240 to 528 square feet of building area. The comparables sold from April 2018 to October 2020 for prices ranging from \$482,500 to \$795,000 or from \$217.30 to \$322.65 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 \$192,775. The subject's assessment reflects a market value of \$579,774 or \$358.55 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, with two located in the same neighborhood code as the subject and within 0.81 of a mile from the subject property. The comparables have sites that range in size from 7,090 to 20,090 square feet of land area. The comparables are improved with 1-story¹, 1.5-story or 2-story dwellings of stucco, brick, wood siding or brick and wood siding exterior construction ranging in size from 1,286 to 1,941 square feet of living area that were built from 1900 to 1957, with comparables #1 and #5 have effective year built of 1980 and 1930, respectively. Four comparable each have a basement, two with finished area, and one has a concrete slab foundation. Each comparable has central air conditioning. Three comparables have one or two fireplaces. Four comparables each have a garage, three with 484 or 528 square feet of building area.² The comparables sold from May 2018 to December 2021 for prices ranging from \$563,000 to \$770,000 or from \$365.79 to \$442.02 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, counsel for the appellant contended that board of review comparables are not comparable due to differences in neighborhood location, story height and some features when compared to the subject.

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 ten suggested comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables as well as board of review comparables #1 and #4 due to their dissimilar dwelling sizes when compared to the subject. The Board has given

¹ Although comparable #2 is described as a one-story dwelling, the board of review reports 1,485 square feet of ground floor living area and 1,705 square feet of above ground living area indicating that the subject is a part two-story and a part one-story dwelling.

² Board of review comparable #2 is erroneously reported to have a 16 square foot garage.

reduced weight to the board of review comparable #5 due to its sale date in 2018, which is less proximate in time to the January 1, 2021 assessment than the other sales in the record.

The Board finds the best evidence of market value to be the board of review comparables #2 and #3. The Board finds that these comparables sold proximate in time to the assessment date at issue and are relatively similar to the subject in location, design, dwelling size and some features. The comparables sold in July 2020 and December 2021 or for prices \$588,000 and \$665,000 or for \$385.07 and \$390.03 per square foot of living area, including land. The subject's assessment reflects a market value of \$579,774 or \$358.55 per square foot of living area, including land, which falls below the two best comparable sales contained in this record. 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: June 27, 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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