



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

APPELLANT: Joe Stella
DOCKET NO.: 21-04364.001-R-1
PARCEL NO.: 12-33-409-057

The parties of record before the Property Tax Appeal Board are Joe Stella, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Lake Forest; 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: \$68,997
IMPR.: \$136,512
TOTAL: \$205,509

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 2-story dwelling of brick exterior construction with 3,100 square feet of living area. The dwelling was constructed in 1968. Features of the home include a basement, central air conditioning, and a 759 square foot garage. The property has a 7,086 square foot site and is located in Lake Forest, Shields 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 from 0.15 of a mile to 1.86 miles from the subject. The parcels range in size from 11,813 to 27,735 square feet of land area and are improved with 2-story homes of brick, vinyl siding, aluminum siding and brick, or brick, cedar, and stone exterior construction.¹ The dwellings range in size from 2,494 to 3,610 square

¹ Additional details regarding the comparables are found in their listing sheets presented by the appellant and/or the board of review and in the grid analysis of these comparables presented by the board of review.

feet of living area and were built from 1922 to 1977 with comparables #1 and #5 having effective ages of 1974 and 1960, respectively. The appellant reported comparables #3, #4, and #5 were recently rehabbed. Each home has a basement, four of which have finished area, central air conditioning, and a garage ranging in size from 414 to 864 square feet of building area. Four homes each have one or two fireplaces. The comparables sold from August 2020 to May 2021 for prices ranging from \$565,000 to \$829,900 or from \$161.47 to \$296.21 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$205,509. The subject's assessment reflects a market value of \$618,072 or \$199.38 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 four comparable sales located from 0.09 of a mile to 1.22 miles from the subject. The parcels range in size from 3,750 to 16,800 square feet of land area and are improved with 2-story homes of wood siding or brick exterior construction ranging in size from 1,768 to 2,208 square feet of living area. The dwellings were built from 1900 to 1963 with comparable #4 having an effective age of 1940. Three homes each have a basement, one of which has finished area, and one home has a concrete slab foundation. Two homes each have central air conditioning and one home has a fully finished attic. Two comparables each have a 440 or a 924 square foot garage. The comparables sold from October 2019 to March 2021 for prices ranging from \$335,000 to \$580,000 or from \$180.01 to \$235.86 per square foot of living area, including land.

The board of review submitted a brief contending the property was the subject of an appeal before the Board in Docket No. 19-05065.001-R-1 in which a decision was issued lowering the assessment to \$203,546 by agreement of the parties. The board of review argued the subject's assessment is lower than the 2019 tax year assessment plus the 2020 and 2021 equalization factors. 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 a total of nine comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #1 through #4 and the board of review's comparable #1, which are located more than one mile from the subject. The Board gives less weight to the board of review's comparables #3 and #4, due to substantial differences from the subject in dwelling size and/or garage amenity and/or which sold less proximate in time to the assessment date than the other comparables in this record.

The Board finds the best evidence of market value to be the appellant's comparable #5 and the board of review's comparable #2, which sold more proximate in time to the assessment date, and which are more similar to the subject in distance from the subject, effective age, site size, and features, although these homes are significantly smaller than the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These two most similar comparables sold for prices of \$435,000 and \$738,750 or for \$197.01 and \$296.21 per square foot of living area, including land. The subject's assessment reflects a market value of \$618,072 or \$199.38 per square foot of living area, including land, which is bracketed by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from 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:

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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