



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

APPELLANT: James Lentino
DOCKET NO.: 21-04412.001-R-1
PARCEL NO.: 11-20-305-027

The parties of record before the Property Tax Appeal Board are James Lentino, 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: \$94,620
IMPR.: \$189,292
TOTAL: \$283,912

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 is improved with a two-story dwelling of brick construction built in 1990 containing 4,247 square feet of living area. Features of the home include an unfinished basement, central air conditioning, one fireplace and an attached garage with 764 square feet of building area. The property has a 21,879 square foot site and is in Libertyville, Libertyville 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 improved with two-story dwellings of frame or brick construction that range in size from 3,604 to 4,763 square feet of living area. The homes were built from 1991 to 2000. Each home has an unfinished basement, central air conditioning, one to three fireplaces and an attached garage ranging in size from 731 to 967 square feet of building area. The comparable sales have sites ranging in size from 24,078 to

37,841 square feet of land area and are located from .19 to .27 miles from the subject property. The sales occurred from November 2019 to March 2021 for prices ranging from \$725,000 to \$845,000 or from \$177.41 to \$201.17 per square foot of living area, land included. The appellant requested the subject's assessment be reduced to \$263,288.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$283,912. The subject's assessment reflects a market value of \$853,871 or \$201.05 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 asserted that it had reduced the subject's 2020 assessment to \$279,139 based on the sale of the subject property in 2019. The board of review submitted a copy of a listing disclosing the subject property sold in July 2019 for a price of \$837,500. The board of review argued that the subject's assessment for the 2021 tax year was established using the 2020 assessment adjusted by the appropriate equalization factor as provided by section 16-80 of the Property Tax Code (35 ILCS 200/16-80). The board of review contends the best indicator of value is a fair market sales price. The board of review submission included a copy of the subject's property record card disclosing the subject's 2020 assessment was reduced to \$279,139 based on a board of review decision.

In further support of the assessment the board of review submitted information on three comparable sales with comparable #1 being the same property as appellant's comparable sale #4. The comparable sales are improved with two-story dwellings of frame or brick construction built from 1991 to 1999 that range in size from 3,604 to 4,687 square feet of living area. Each comparable has an unfinished basement with four being a walk-out design, central air conditioning, one or three fireplaces and an attached garage ranging in size from 731 to 926 square feet of building area. The comparables have sites ranging in size from 24,078 to 41,855 square feet of land area and are located from .11 to .24 miles from the subject property. The sales occurred from August 2019 to February 2021 for prices ranging from \$725,000 to \$1,070,000 or from \$201.17 to \$228.29 per square foot of living area, land included. The board of review requested no change to 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.

Based on the evidence in this record, the Board gives the appellant's overvaluation argument little weight. The appellant requested the subject's assessment be reduced to \$263,288, based on comparable sales, which would reflect a market value of approximately \$789,943 when applying the statutory level of assessment. The record disclosed, however, that the subject property was purchased in July 2019 for a price of \$837,500 after being listed on May 1, 2019, for a price of

\$875,000. The purchase price of \$837,500 undermines the appellant's request that the subject's assessment should be reduced to \$263,288, reflecting a market value significantly below the purchase price.

Second, the record also disclosed the board of review had reduced the subject's 2020 assessment to \$279,139, which is reflective of the subject's 2019 purchase price of \$837,500 when applying the statutory level of assessment. The "Board of Review Notes on Appeal" disclosed that 2019 was the first year of the general assessment cycle for the subject property had a township equalization factor of 1.0171 applied for the 2021 tax year increasing the subject's assessment from \$279,139 to \$283,912. Section 16-80 of the Property Tax Code (35 ILCS 200/16-80) provides:

Reduced assessment of homestead property. In any county with fewer than 3,000,000 inhabitants, if the board of review lowers the assessment of a particular parcel on which a residence occupied by the owner is situated, the reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless the taxpayer, county assessor, or other interested party can show substantial cause why the reduced assessment should not remain in effect, or unless the decision of the board is reversed or modified upon review.

The Board finds the sales submitted by the parties did not show substantial cause why the reduced assessment established by the board of review for the 2020 tax year should not remain in effect for the 2021 tax year, subject to equalization. The record indicates that 2020 and 2021 are within the general assessment period and the subject property is a residence occupied by the owners. The record contains six sales submitted by the parties to support their respective positions, with one sale being common to both parties. The Board gives little weight to the common sale provided by the parties, appellant's comparable #4/board of review comparable #1, due to differences from the subject dwelling in size. The five remaining comparables are more similar to the subject dwelling in size and sold for prices ranging from \$785,000 to \$1,050,000 or from \$177.41 to \$228.29 per square foot of living area, including land. The subject's assessment reflects a market value of \$853,871 or \$201.05 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence the Board finds the assessment of the subject property as established by the board of review is correct and 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: October 17, 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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