



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

APPELLANT: Jamie Lane
DOCKET NO.: 21-04417.001-R-1
PARCEL NO.: 11-20-402-030

The parties of record before the Property Tax Appeal Board are Jamie Lane, 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: \$57,632
IMPR.: \$91,306
TOTAL: \$148,938

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 wood siding exterior construction with 2,180 square feet of living area. The dwelling was constructed in 1968 and has an effective age of 1971. Features of the home include a basement,¹ central air conditioning, one fireplace and a 420 square foot garage. The property has an approximately 13,532 square foot site and is located in Libertyville, Libertyville Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted a grid analysis and Multiple Listing Service (MLS) sheets on comparables #1 and #3. The appellant's three comparable sales are located within 0.36 of a mile from the subject property. The comparables have sites that range in size from 9,973 to 11,878 square feet

¹ The board of review submitted a copy of an Multiple Listing Service sheet associated with the May 2022 sale of the subject property which depicts the subject had a partially finished basement at the time of sale.

of land area and are improved with two-story dwellings of brick and frame exterior construction that range in size from 2,175 to 2,377 square feet of living area. The dwellings were built in 1966 or 1968. Each comparable has a basement with one having finished area.² Each dwelling has central air conditioning and a garage ranging in size from 410 to 583 square feet of building area. Two homes each have one fireplace. The MLS sheets for comparables #1 and #3 report these properties were updated in 2012 and 2019, respectively. The properties sold in April 2019 and July 2020 for prices ranging from \$380,000 to \$510,000 or from \$174.59 to \$225.17 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$127,881 which reflects a market value of \$383,681 or \$176.00 per square foot of living area, land included, 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 \$148,938. The subject's assessment reflects a market value of \$447,934 or \$205.47 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 response to the appellant's evidence and argument, the board of review submitted an MLS sheet associated with the May 2022 sale of the subject property for a price of \$599,000. The listing sheet reports the property was on the open market for a period of five days and the sale price was equal to the original list price. The MLS sheet for the subject property depicts the dwelling had its kitchen and baths updated in 2016 and that the subject's basement was partially finished at the time of the sale.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located within 0.51 of a mile from the subject property. The comparables have sites that range in size from 10,050 to 12,770 square feet of land area and are improved with two-story dwellings of brick or wood siding exterior construction that range in size from 2,166 to 2,669 square feet of living area. The homes were built from 1968 to 1983. Each comparable has a basement, central air conditioning, one fireplace and a garage ranging in size from 400 to 452 square feet of building area. The properties sold from May 2020 to September 2021 for prices ranging from \$510,000 to \$575,000 or from \$215.44 to \$235.46 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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.

² The MLS sheet for appellant comparable #1 reports the dwelling has a finished basement.

The parties submitted six comparable sales for the Board's consideration. The Board gives less weight to appellant comparables #1 and #3 which sold in 2019, less proximate in time to the January 1, 2021 assessment date than other properties in the record. The Board gives less weight to board of review comparables #2 and #3 which are dissimilar to the subject in age and/or dwelling size.

The Board finds the best evidence of market value to be appellant comparable #2 along with board of review comparable #1 which sold proximate to the assessment date at issue and are more similar to the subject in location, age, design, dwelling size and other features. These two best comparables sold in July 2020 and September 2021 for prices of \$380,000 and \$510,000 or for \$174.71 and \$235.46 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$447,934 or \$205.47 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record. After considering appropriate adjustments to the comparables for differences from the subject, the Board finds the subject's assessment is justified and a reduction in the subject's assessment is not warranted.

Furthermore, the subject's May 2022 sale for a price of \$599,000 undermines the appellant's argument that the subject property is over assessed.

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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