



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

APPELLANT: Janice Kiptoon  
DOCKET NO.: 21-04888.001-R-1  
PARCEL NO.: 08-09-106-025

The parties of record before the Property Tax Appeal Board are Janice Kiptoon, 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:** \$11,986  
**IMPR.:** \$57,773  
**TOTAL:** \$69,759

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 split-level dwelling of brick exterior construction with 1,542 square feet of above ground living area.<sup>1</sup> The dwelling was constructed in 1964. Features of the home include an 814 square foot finished lower level and a detached garage containing 750 square feet of building area. The property has a site measuring approximately 9,317 square feet and is located in Waukegan, Waukegan Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted a grid analysis with information on twelve equity comparables located within .94 of a mile from the subject and within the same

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<sup>1</sup> The appellant described the subject dwelling as a "1-story" home. However, the Board finds that the subject's property record card which contains a schematic diagram depicting the home as "split-level" is the best evidence of the subject dwelling's design.

assessment neighborhood code as the subject property. The comparables are described as 1-story homes of wood frame construction ranging in size from 1,326 to 1,592 square feet of above ground living area. The homes were built from 1958 to 1992. Three comparables are described as each having an unfinished basement; six comparables have central air conditioning; four homes each have a fireplace; and each dwelling has a garage ranging in size from 264 to 576 square feet of building area. The improvement assessments of the comparables range from \$45,262 to \$61,588 or from \$32.67 to \$45.55 per square foot of above ground living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$69,759. The subject property has an improvement assessment of \$57,773 or \$37.47 per square foot of above ground living area.

In support of its contention of the correct assessment, the board of review submitted a property record card for the subject property along with a grid analysis with information on five equity comparables located within .75 of a mile from the subject and within the same assessment neighborhood code as the subject property. The comparables consist of split-level dwellings with brick, wood siding and brick, or aluminum siding exteriors ranging in size from 1,302 to 1,392 square feet of above ground living area. The homes were built from 1959 to 1974. The comparables each feature a finished lower level with one having an unfinished basement. Four comparables have central air conditioning, and each comparable has a fireplace and an attached or a detached garage ranging in size from 414 to 702 square feet of building area. The comparables have improvement assessments that range from \$52,267 to \$60,288 or from \$37.78 to \$42.49 per square foot of above ground living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

### **Conclusion of Law**

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of seventeen equity comparables in support of their positions before the Property Tax Appeal Board. The Board gave less weight to appellant's comparables due to being different design homes than the subject dwelling, having a basement area which is not a feature of the subject dwelling, and/or being much newer in age when compared to the subject. The Board also gave less weight to board of review comparable #4 based on having a basement which is not a feature of the subject dwelling.

The Board finds the best evidence of equity in assessment to be board of review comparables #1, #2, #3, and #5 which are similar to the subject property in terms of location, design, dwelling size, age, foundation, and most features. These most similar comparables in the record have

improvement assessments ranging from \$52,267 to \$60,288 or from \$37.78 to \$42.49 per square foot of above ground living area. The subject's improvement assessment of \$57,773 or \$37.47 per square foot of above ground living area falls within the range established by the most similar comparables in this record both in terms of overall improvement assessment and on a per square foot of living area basis. After considering adjustments to the best comparables in the record for any differences from the subject, the Board finds that the appellant did not establish by clear and convincing evidence that the subject dwelling is inequitably assessed and, therefore, no reduction in the subject's improvement 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:

July 18, 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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COUNTY

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