



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

APPELLANT: Adrian Manea
DOCKET NO.: 21-05121.001-R-1
PARCEL NO.: 11-02-201-106

The parties of record before the Property Tax Appeal Board are Adrian Manea, 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: \$49,889
IMPR.: \$82,321
TOTAL: \$132,210

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 and cedar exterior construction containing 3,039 square feet of living area. The dwelling was built in 1998. Features of the home include a crawl space foundation, central air conditioning, one fireplace, and an attached three-car garage with 619 square feet of building area. The property has a site with approximately 11,370 square feet of land area located in Waukegan, Libertyville Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$380,000 as of January 1, 2020. The appraisal was prepared by R. Steven Kephart, a State of Illinois certified residential real estate appraiser.

The appraiser described the subject property as being well cared for with no functional depreciation noted and physical depreciation due to normal wear which was represented by the dwelling's effective age of 10 years. The appraiser explained the subject has had ongoing repair and maintenance which accounts for the difference between the subject's actual age (22 years old as of January 1, 2020) and the estimated effective age. The appraiser indicated the subject suffered from external depreciation because of excessive road noise from I-94.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value using four comparable sales improved with two-story dwellings of brick and vinyl, brick and aluminum, or vinyl exterior construction that range in size from 3,039 to 3,128 square feet of living area. The homes were 22 or 23 years old. Each comparable has a basement with three having finished area, central air conditioning, one fireplace, and a three-car garage. The comparables have sites with either 10,019 or 11,761 square feet of land area. These properties are located from approximately .11 to .18 of a mile from the subject property. The sales occurred from February 2019 to August 2019 for prices ranging from \$365,000 to \$446,700 or from \$116.69 to \$146.99 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject resulting in adjusted prices ranging from \$330,900 to \$414,900 and arrived at an estimated market value of \$380,000 as of January 1, 2020. The appellant requested the subject's total assessment be reduced to \$126,612.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$132,210. The subject's assessment reflects a market value of \$397,624 or \$130.84 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 improved with two-story dwellings of wood siding exterior construction that range in size from 2,805 to 3,088 square feet of living area. The homes were built in 1997 and 1998. Each comparable has a full unfinished basement, central air conditioning, one fireplace, and an attached garage ranging in size from 428 to 630 square feet of building area. These properties have sites ranging in size from 10,210 to 14,620 square feet of land area. The comparables have the same assessment neighborhood code as the subject and are located from approximately .08 to .25 of a mile from the subject property. The sales occurred from July 2020 to July 2021 for prices ranging from \$450,000 to \$572,800 or from \$157.88 to \$185.49 per square foot of living area, including land.

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 Board finds the best evidence of market value to be the board of review comparable sales as these properties sold more proximate in time to the assessment date than the comparable sales contained in the appellant's appraisal. The comparable sales submitted by the board of review were similar to the subject property in most respects with the exception each comparable has an unfinished basement whereas the subject has a crawl space foundation suggesting each comparable would require a downward adjustment to make them more equivalent to the subject for this superior attribute. The board of review comparable sales sold for prices ranging from \$450,000 to \$572,800 or from \$157.88 to \$185.49 per square foot of living area, including land. The subject's assessment reflects a market value of \$397,624 or \$130.84 per square foot of living area, including land, which is below the range established by the best comparable sales in the record but justified when considering the suggested adjustment to the comparables for basement area. Less weight was given the appellant's appraisal as the effective date of the report was one year prior to the assessment date at issue and the sales in the report did not occur as proximate in time to the assessment date as the sales provided by the board of review. Based on this evidence the Board finds the assessment of the subject property 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: January 16, 2024



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Adrian Manea, by attorney:
Ronald Kingsley
Lake County Real Estate Tax Appeal, LLC
40 Landover Parkway
Suite 2
Hawthorn Woods, IL 60047

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085