



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

APPELLANT: Hilda & Gleason Imperial
DOCKET NO.: 22-00455.001-R-1
PARCEL NO.: 03-25-207-027

The parties of record before the Property Tax Appeal Board are Hilda & Gleason Imperial, the appellants, by attorney George N. Reveliotis of Reveliotis Law, P.C. in Park Ridge; 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: \$17,444
IMPR.: \$70,050
TOTAL: \$87,494

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 2022 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 2,215 square feet of living area. The dwelling was constructed in 2004. Features of the home include a basement, central air conditioning¹ and a 620 square foot attached garage. The property has an approximately 9,800 square foot site and is located in Beach Park, Newport Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted two separate grid analyses with information on seven comparable sales.² The comparables each have the same assessment neighborhood code as the subject. The parcels

¹ The appellants reported the subject dwelling has central air conditioning, which was not reported by nor was it refuted by the board of review.

² The Board has renumbered the appellants' second set of three comparables as #5 through #7 for ease of reference.

range in size from 7,362 to 12,014 square feet of land area. The comparables are improved with two-story dwellings of wood siding exterior construction ranging in size from 2,215 to 2,492 square feet of living area. The dwellings were built in 2002 or 2003. The appellants reported that each comparable has a basement, central air conditioning and an attached garage. According to the Multiple Listing Service (MLS) sheets submitted by the appellants for comparables #1 through #6, three comparables have finished basement area, four comparables each have a fireplace and six comparables each have a two-car garage. The comparables sold from December 2019 to February 2021 for prices ranging from \$250,000 to \$290,000 or from \$100.32 to \$116.89 per square foot of living area, including land. Based on this evidence, the appellants requested the subject's assessment be reduced to \$82,133, which would reflect a market value of \$246,424 or \$111.25 per square foot of ground living area, including land, when using 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 \$87,494. The subject's assessment reflects a market value of \$262,508 or \$118.51 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.³

In support of its contention of the correct assessment the board of review submitted information on four comparable sales that have the same assessment neighborhood code as the subject. The board of review's comparable #4 is the same property as the appellants' comparable #1. The parcels range in size from 7,360 to 9,800 square feet of land area. The comparables are improved with two-story dwellings of wood siding exterior construction ranging in size from 2,041 to 2,481 square feet of living area. The dwellings were each built in 2003. Each comparable has a basement, central air conditioning and a garage ranging in size from 410 to 430 square feet of building area. Three comparables each have a fireplace. The comparables sold from February 2021 to May 2022 for prices ranging from \$290,000 to \$325,000 or from \$116.89 to \$147.97 per square foot of living area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains ten comparable sales for the Board's consideration, as one sale was common to both parties. The Board has given less weight to the appellants' comparables #2 through #7

³ Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2022.

due to their sale dates occurring in 2019 or 2020, which are less proximate in time to the lien date at issue than the other sales in the record.

The Board finds the best evidence of market value to be the appellants' comparable #1/board of review comparable #4, along with board of review comparables #1, #2 and #3, which sold more proximate in time to the January 1, 2022 assessment date. These four comparables are similar to the subject in location, dwelling size, design, age and some features. The comparables sold from February 2021 to May 2022 for prices ranging from \$290,000 to \$325,000 or from \$116.89 to \$147.97 per square foot of living area, including land. The subject's assessment reflects a market value of \$262,508 or \$118.51 per square foot of living area, including land, which falls below the range established by the best comparable sales in the record in terms of overall market value but within the range on a price per square foot basis. Based on this record, the Board finds the appellants did not prove by a preponderance of the evidence that the subject was overvalued 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: March 26, 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

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