



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

APPELLANT: Anthony Krzysko
DOCKET NO.: 22-00583.001-R-1
PARCEL NO.: 13-11-101-005

The parties of record before the Property Tax Appeal Board are Anthony Krzysko, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$34,885
IMPR.: \$136,815
TOTAL: \$171,700

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 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 2-story dwelling of frame exterior construction with 2,620 square feet of living area. The dwelling was built in 1965 and is approximately 57 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace, and a garage with 660 square feet of building area. The property has an approximately 24,191 square foot site and is located in Tower Lakes, Cuba 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 located in the subject's assessment neighborhood code and from 0.39 of a mile to 1.1 miles from the subject. The comparables have sites that range in size from 6,752 to 52,732 square feet of land area. The comparables are improved with 2-story dwellings of frame or frame and brick exterior construction ranging in size from 2,178 to 3,241 square feet of living area. The dwellings range in age from 44 to 87

years old. The comparables each have a basement with three having finished area. Each comparable has central air conditioning, one or three fireplaces, and a garage ranging in size from 240 to 664 square feet of building area. The properties sold from November 2020 to September 2021 for prices ranging from \$390,000 to \$560,000 or from \$162.43 to \$179.06 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$150,126 which reflects a market value of \$450,423 or \$171.92 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 \$171,700. The subject's assessment reflects a market value of \$516,236 or \$197.04 per square foot of living area, land included, when using the 2022 three-year average median level of assessment for Lake County of 33.26% as determined by the Illinois Department of Revenue.

The board of review noted that the subject had a 471 square foot screen porch and a 188 square foot enclosed porch "that may be converted to living after a field visit is completed in 2023. The board of review commented in the grid analysis for its comparable #2 "condition good to offset depreciation."

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales¹ located in the subject's assessment neighborhood code and within 0.64 of a mile from the subject. The comparables have sites that range in size from 9,600 to 23,220 square feet of land area. The comparables are improved with 1.5-story dwellings of frame or brick exterior construction ranging in size from 2,302 to 2,574 square feet of living area. The dwellings were built from 1940 to 1965 and thus are approximately 57 to 82 years old. Comparable #2, the oldest home, has a reported effective age of 1956. Each comparable has a partially finished basement, central air conditioning, one or two fireplaces, and a garage ranging in size from 546 to 742 square feet of building area. The properties sold from May 2021 to August 2022 for prices ranging from \$461,137 to \$554,000 or from \$188.42 to \$221.25 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of 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.

¹ Board of review comparable #4 has the same address, sale date, and sale price as board of review comparable #3, therefore, signifying the two parcels sold in the same transaction. Therefore, the Board will combine the lot sizes for the two parcels.

The record contains seven comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2, and #4 which differ from the subject in age and/or dwelling size. The Board also gives less weight to the appellant's comparable #3 which has a 2020 sale date occurring less proximate in time to the subject's January 1, 2022 assessment date at issue than other sales in this record.

The Board finds the best evidence of market value to be the board of review comparables which sold proximate in time to the subject's assessment date and are similar to the subject in location, age/effective age, dwelling size, and some features, except each comparable has a partially finished basement, unlike the subject, suggesting downward adjustments for this difference would be necessary to make them more equivalent to the subject. Conversely, board of review comparable #2 has a considerably smaller lot size than the subject suggesting an upward adjustment for this difference would be necessary to make it more equivalent to the subject. These properties sold from May 2021 to August 2022 for prices ranging from \$461,137 to \$554,000 or from \$188.42 to \$221.25 per square foot of living area, land included. The subject's assessment reflects an estimated market value of \$516,236 or \$197.04 per square foot of living area, land included, which falls within the range established by the best comparable sales in this record. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported and a reduction in the subject's assessment is not 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:

May 21, 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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