



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

APPELLANT: Raymond Gialo
DOCKET NO.: 23-00579.001-R-1
PARCEL NO.: 02-26-402-004

The parties of record before the Property Tax Appeal Board are Raymond Gialo, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Hawthorn Woods; 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: \$11,678
IMPR.: \$77,591
TOTAL: \$89,269

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 2023 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 wood siding exterior construction with 1,760 square feet of living area. The dwelling was constructed in 1985 and is approximately 38 years old. Features of the home include an unfinished basement, central air conditioning, a fireplace, and a garage containing 440 square feet of building area. The property has an 8,696 square foot site and is located in Lindenhurst, Lake Villa Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on five comparable sales located within .42 of a mile from the subject and within the same assessment neighborhood code as the subject property. The comparables have sites ranging in size from 8,895 to 11,456 square feet of land area. The sites are improved with 2-story dwellings of wood frame exterior finishes that range in size from 1,782 to 2,096 square feet of living area and that range in age from 27 to 46 years old. Each

comparable features an unfinished basement, central air conditioning, a fireplace, and a garage ranging in size from 400 to 484 square feet of building area. The comparables sold from February 2021 to October 2022 for prices ranging from \$245,000 to \$330,000 or from \$133.11 to \$177.42 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's total assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$89,269. The subject's assessment reflects a market value of \$267,834 or \$152.18 per square foot of living area, land included, when using the statutory level of assessment of 33.25%.¹

In support of its contention of the correct assessment, the board of review submitted a grid analysis with information on four comparable sales with board of review comparables #1 and #2 being the same properties as appellant's comparables #5 and #4, respectively. The comparables are located from .13 of a mile to 1.69 miles from the subject and in the same assessment neighborhood code as the subject property. The comparables have parcels ranging in size from 8,896 to 11,018 square feet of land area. The sites are improved with 2-story dwellings of wood or vinyl siding exteriors that range in size from 1,740 to 2,064 square feet of living area and that range in age from 31 to 48 years old. Each dwelling features a basement, one with finished area. Each home also has central air conditioning, one or two fireplaces, and a garage containing either 400 or 440 square feet of building area. The comparables sold from June 2022 to June 2023 for prices ranging from \$304,900 to \$330,000 or from \$155.04 to \$178.98 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 parties submitted a total of seven comparable sales for the Board's consideration which includes two common comparables. After analyzing the evidence submitted, the Board gave less weight to board of review comparable #3 based on its location being more than one mile from the subject and given its partially finished basement, dissimilar to the subject's unfinished basement. The Board also gave less weight to appellant's comparables #1, #2, and #3 based on their sale dates occurring in 2021 which are less proximate in time to the January 1, 2023 assessment date at issue and therefore less likely to reflect the subject's market value as of the lien date than the remaining comparables in the record.

¹ 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 2023.

On this record, the Board finds the best evidence of market value to be board of review comparables #1, #2, and #4 which includes the parties' common comparables. These three comparables are each located in close proximity to the subject and are relatively similar to the subject in design, lot size, age, and most features. However, board of review comparable #2/appellant's comparable #4 is larger in dwelling size relative to the subject dwelling indicating that downward adjustment is needed to this comparable for this difference from the subject. The best comparables in this record sold from June 2022 to June 2023 for prices ranging from \$304,900 to \$330,000 or from \$155.04 to \$177.42 per square foot of living area, including land. The subject's assessment reflects a market value of \$267,834 or \$152.18 per square foot of living area, including land, which is lower than the best comparable sales in this record in terms of overall value as well as on a per square foot of living area basis.

Based on this record and after considering all the comparables submitted by the parties with emphasis on those properties that sold most proximate in time to the lien date at issue and those comparables most similar in characteristics to the subject, and after considering adjustments to the best comparables in this record for differences from the subject, the Board finds that the appellant did not establish by a preponderance of the evidence that the subject property is overvalued. Therefore, the Board finds 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: _____

November 19, 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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