



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

APPELLANT: Jaclyn Alberti
DOCKET NO.: 23-00597.001-R-1
PARCEL NO.: 03-21-404-013

The parties of record before the Property Tax Appeal Board are Jaclyn Alberti, 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: \$30,713
IMPR.: \$129,283
TOTAL: \$159,996

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 two-story dwelling of frame exterior construction with 3,350 square feet of living area. The dwelling was constructed in 1993 and is approximately 30 years old. Features of the home include a full unfinished basement, central air conditioning, two fireplaces and a 725 square foot garage. The property has a 44,431 square foot site and is located in Wadsworth, Newport Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales located in the same neighborhood code and within .27 of a mile from the subject. The parcels range in size from 46,174 to 77,106 square feet of land area which are each improved with a two-story dwelling. The dwellings are either 27 or 30 years old and range in size from 2,774 to 4,013 square feet of living area. Each comparable has a basement, one of which has finished area based on the attached data sheet from

the Multiple Listing Service (MLS). Features include central air conditioning, a fireplace and a garage ranging in size from 672 to 851 square feet of building area. The comparables sold from June to October 2021 for prices ranging from \$465,000 to \$582,000 or from \$140.53 to \$182.05 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment of \$157,434 which would reflect a market value of approximately \$472,349 or \$141.00 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$159,996. The subject's assessment reflects a market value of \$480,036 or \$143.29 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In response to the appeal, the board of review submitted an MLS data sheet depicting the sale of the subject property in December 2023 (prior to the filing of this appeal) reflecting a price of \$715,000, which is substantially greater than the estimated market value reflected by its 2023 assessment. In addition, the board of review noted that each of the comparables presented by the appellant sold in 2021, or dates from 14 to 18 months prior to the lien date in this appeal. Finally, the board of review presented documentation that the appellant's comparable sale #1 sold in two days for a price greater than its asking price.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales, three of which are located in the same neighborhood code as the subject and within .76 of a mile from the subject. The parcels range in size from 47,045 to 92,783 square feet of land area which are each improved with either a one-story or a two-story dwelling of brick or wood siding exterior construction. The dwellings range in age from 22 to 31 years old and range in size from 2,859 to 3,360 square feet of living area. Three comparables have basements and comparable #3 does not have a basement. Features include central air conditioning, one or two fireplaces and a garage ranging in size from 600 to 900 square feet of building area. The comparables sold from January 2022 to February 2023 for prices ranging from \$482,500 to \$630,000 or from \$146.12 to \$194.12 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 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

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 issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2023.

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 to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables which sold in 2021, dates more remote in time from the lien date than other sales in this record. Reduced weight has been given to board of review comparable #3 due to its lack of a basement foundation, which is a feature of the subject property.

The Board finds the best evidence of market value to be board of review comparable sales #1, #2 and #4 which present varying degrees of similarity to the subject property which necessitate adjustments to the best comparables for differences when compared to the subject. These most similar comparables sold from May 2022 to February 2023 for prices ranging from \$555,000 to \$630,000 or from \$181.55 to \$194.12 per square foot of living area, including land. The subject's assessment reflects a market value of \$480,036 or \$143.29 per square foot of living area, including land, which is below the range established by the best comparable sales in this record both in terms of overall value and on a per-square-foot of living area basis. Furthermore, the record reveals that the subject property sold in late 2023 for \$715,000 or substantially more than its estimated market value as reflected by its 2023 assessment. Therefore, based on this evidence and after considering appropriate adjustments to the best comparables when compared to the subject, 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: _____

August 20, 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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