



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

APPELLANT: Lorina Jacobson
DOCKET NO.: 23-01501.001-R-2
PARCEL NO.: 16-23-411-012

The parties of record before the Property Tax Appeal Board are Lorina Jacobson, 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: \$137,159
IMPR.: \$457,318
TOTAL: \$594,477

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 brick exterior construction with 4,733 square feet of living area. The dwelling was constructed in 1995 and is approximately 28 years old. Features of the home include a full basement with finished area, 6½ bathrooms, central air conditioning, four fireplaces on one stack and a 1,100 square foot garage.¹ The property has a 23,235 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a brief along with information on three comparable sales located in the subject's neighborhood code and within .50 of a mile from the subject. The parcels range in size from 21,675 to 24,372 square feet of land area which are each improved with a two-story

¹ Descriptive details not provided by the appellant have been drawn from the property record card supplied by the board of review. The appellant did not submit rebuttal challenging this information.

dwelling ranging in age from 21 to 29 years old. The homes range in size from 4,233 to 4,918 square feet of living area and in the brief, the appellant noted that comparable #2 is a larger dwelling than the subject. Each comparable has an unfinished basement, central air conditioning, one fireplace and a garage ranging in size from 529 to 714 square feet of building area. The comparables sold from July 2021 to April 2022 for prices ranging from \$940,000 to \$1,375,000 or from \$199.87 to \$324.83 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$594,477. The subject's assessment reflects a market value of \$1,783,609 or \$376.85 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located in the subject's neighborhood code and within .94 of a mile from the subject. The parcels range in size from 19,000 to 55,640 square feet of land area which are each improved with a two-story dwelling ranging of brick exterior construction. The homes range in age from 20 to 90 years old and range in size from 5,241 to 5,386 square feet of living area. Each comparable has a full basement with finished area, central air conditioning, two to five fireplaces and a garage ranging in size from 528 to 888 square feet of building area. Comparable #2 has an inground swimming pool. The comparables sold from August 2022 to April 2023 for prices of \$2,200,000 or \$2,300,000 or from \$408.47 to \$438.85 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 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 six comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1 and #3, each of which sold in 2021, dates more remote in time to the lien date at issue of January 1, 2023 and in comparison to other sales that occurred more proximate in time to the lien date. The Board has given reduced weight to board of review comparable #1, due to the dwelling's significantly older age of 90 years when compared to the subject dwelling that is 28 years old.

² 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.

The Board finds the best evidence of market value to be appellant's comparable sale #2 and board of review comparable sales #2 and #3, each of which are similar to the subject in location, age, style, dwelling size, foundation type and some other features. Appellant's comparable #2 lacks basement finish and has a smaller garage which suggests upward adjustments would be necessary to make the comparable more equivalent to the subject. Similarly, the best board of review comparables necessitate adjustments for differences in bathroom count, dwelling size and other features, including smaller garages and for comparable #2, an inground pool which is not a feature of the subject. These most similar comparables sold for prices of \$1,340,000 or \$2,300,000 or from \$272.47 to \$438.85 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,783,609 or \$376.85 per square foot of living area, including land, which is within 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, including land, which is logical given appropriate adjustments for differences. Based on this evidence, 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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