



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

APPELLANT: Karla Saldana  
DOCKET NO.: 23-02270.001-R-1  
PARCEL NO.: 04-20-101-013

The parties of record before the Property Tax Appeal Board are Karla Saldana, the appellant; and the Lake County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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:** \$8,677  
**IMPR.:** \$44,000  
**TOTAL:** \$52,677

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 tri-level dwelling of wood siding exterior construction with 1,209 square feet of living area. The home was built in 1979 and is approximately 44 years old. Features include a lower level with finished area, central air conditioning, 1.5 bathrooms, and a garage with 550 square feet of building area. The property has an approximately 13,167 square foot site and is located in Zion, Zion Township, Lake County.

The appellant contends both overvaluation and assessment inequity with respect to both the land and improvement assessments, as the bases of the appeal.<sup>1</sup>

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<sup>1</sup> The appellant originally appealed the subject's assessment on the bases of overvaluation and new construction. However, due to deficiencies in the original appeal identified by PTAB, the appellant subsequently provided a corrected residential appeal form.

In support of the overvaluation argument, the appellant submitted information on three comparable sales located from 0.78 of a mile to 2.0 miles from the subject property; none of which are located within the same assessment neighborhood as the subject. The comparables have sites that range in size from 7,170 to 8,100 square feet of land area. The comparables are improved with bi-level/raised ranch<sup>2</sup> or tri-level dwellings of vinyl, wood, or aluminum siding exterior construction ranging in size from 1,004 to 1,222 square feet of living area. The homes range in age from 17 to 38 years old. Each comparable has a lower level with finished area, central air conditioning, 2.0 bathrooms, and a garage that ranges in size from 440 to 576 square feet of building area. One comparable has a fireplace. The properties sold from August 2022 to July 2023 for prices of either \$91,000 or \$125,000 or from \$74.47 to \$124.50 per square foot of living area, land included.<sup>3</sup>

As to the inequity argument, the appellant submitted information on five equity comparables located within 0.96 of a mile from the subject property, none of which are located in the same neighborhood code as the subject. The comparables are improved with tri-level dwellings of wood siding exterior construction ranging in size from 1,046 to 1,302 square feet of living area. The homes range in age from 45 to 51 years old. Each comparable has a lower level with finished area and a garage that ranges in size from 308 to 572 square feet of building area. Four comparables each have central air conditioning. Three comparables each have a fireplace. The comparables have land assessments ranging from \$6,693 to \$7,996 or from \$0.57 to 0.94 per square foot of land area. The comparables have improvement assessments ranging from \$36,569 to \$45,656 or from \$34.96 to \$37.50 per square foot of living area.

In the original appeal submittal, the appellant submitted a memorandum to the Property Tax Appeal as well as photographs of the subject and suggested comparables. The photographs of the subject were taken by the appellant to illustrate structural defects and deficiencies with the subject including, but not limited to, cracks on the exterior walls; old windows, siding, and roofing; outdated kitchen and old appliances; and outdated bathroom. Additional evidence submitted by the appellant included photographs of the comparables and limited information from Multiple Listing Service datasheets for the appellant's comparable sales obtained from Zillow.com. The appellant asserted that the subject property is located off a busy street which has become "an industrial commercial business area" that was once a quiet neighborhood. The appellant provided a map in support of this assertion. The appellant asserted the board of review comparables were in better neighborhoods, with better landscaping, and exterior features. The appellant also provided a copy of the letter sent by the appellant to the Lake County board of review.

Based on the foregoing evidence, the appellant requested the subject's assessment be reduced to \$45,757 reflecting a market value of \$137,285 or \$113.55 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%. The appellant's request would reduce the subject's land assessment to \$5,543 or \$0.42 per square foot of land area and the subject's improvement assessment to \$40,214 or \$33.26 per square foot of living area.

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<sup>2</sup> Additional descriptive information was gleaned from the supplemental grid presented by the appellant which was used to update/correct Section V data.

<sup>3</sup> The Board notes the appellant miscalculated the price per square foot of the suggested comparables in the grid and the Board made appropriate corrections.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$57,099. The subject's assessment reflects a market value of \$171,830 or \$142.13 per square foot of living area, land included, when using the 2023 three-year average median level of assessment for Lake County of 33.23% as determined by the Illinois Department of Revenue. The subject would have a land assessment of \$8,677 or \$0.66 per square foot of land area and an improvement assessment of \$48,422 or \$40.05 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information consisting of two grid analyses, the first grid containing sales data on three comparable sales and the second grid containing three comparables<sup>4</sup> with equity data.<sup>5</sup> The three comparable sales are located in the same assessment neighborhood code as the subject property and within 0.77 of a mile from the subject. These properties have sites that range in size from 9,170 to 44,270 square feet of land area and are improved with tri-level dwellings of vinyl or wood siding exterior construction ranging in size from 1,144 to 1,174 square feet of living area. The homes range in age from 26 to 47 years old. Each comparable has a lower level with finished area, central air conditioning, 2.0 bathrooms, and a garage with either 528 or 588 square feet of building area. The properties sold from May 2021 to October 2022 for prices ranging from \$160,000 to \$226,000 or from \$137.22 to \$196.59 per square foot of living area, land included.

Two of the three equity comparables are located in the same assessment neighborhood as the subject and are improved with bi-level/raised ranch or conventional (ranch) style dwellings<sup>6</sup> of wood siding exterior construction ranging in size from 1,120 to 1,288 square feet of living area. The parcels range in size from 12,996 to 13,188 square feet of land area. The dwellings are each 45 years old. Two comparables each have a lower level with finished area and one comparable has a full basement. Each comparable has central air conditioning, 2.0 bathrooms, and a garage that ranges in size from 480 to 1,120 square feet of building area. One comparable has a fireplace. The comparables have land assessments ranging from \$8,563 to \$8,690 or \$0.66 per square foot of land area. These properties have improvement assessments ranging from \$50,257 to \$58,360 or from \$44.87 to \$48.28 per square foot of living area. Based on the foregoing evidence, the board of review requested confirmation of the subject's assessment on both market value and equity grounds.

In written rebuttal, the appellant emphasized the tri-level design of the subject and the lack of comparability of several of the board of review comparables due to differences in their design and/or foundation type. The appellant noted that board of review comparable sale #3 sold in May 2021, remote in time and would be unacceptable by Lake County if the appellant was to use it as evidence. The appellant analyzed each of the board of review comparables for differences from the subject. The appellant also pointed out exterior differences between the properties and subject in relation to landscaping, fencing, and driveways, to mention a few. The appellant submitted photographs of the comparables along with property information printouts, with

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<sup>4</sup> The Board finds comparable #1 to be the same property as the subject.

<sup>5</sup> Some property characteristics for both sets of comparables were gleaned from the evidence presented by the appellant, which was unrefuted by the board of review.

<sup>6</sup> Additional descriptive information, not disclosed for the comparables, was gleaned from the evidence presented by the appellant, which was unrefuted by the board of review.

handwritten notes and comments, to document the property characteristic differences of the board of review comparables relative to the subject. Based on the evidence provided, the appellant appealed to PTAB to review and approve the appeal.

### **Conclusion of Law**

The appellant contends in part an assessment inequity argument, for both the land and improvement assessments, as a basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity, and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The appellant did not meet this burden of proof for the subject's land assessment and a reduction in the land assessment is not warranted. However, the Board finds the appellant met this burden of proof and a reduction in the subject's improvement assessment is warranted.

This record contains eight suggested equity comparables for the Board's consideration, for both the land and improvement assessments.

Concerning the land assessment, the Board gives less weight to the appellant's comparables which have parcels located in a different assessment neighborhood than the subject, less proximate in location relative to the subject than the board of review comparables. The board of review comparables are located in the same assessment neighborhood as the subject, within 153 feet of the subject property, and are more similar in size to the subject's parcel. These parcels have land assessments ranging from \$8,563 to \$8,677 or \$0.66 per square foot of land area. The subject has a land assessment of \$8,677 or \$0.66 per square foot of land area which matches each of the best comparables on a per square foot basis and board of review comparable #2 at the upper end of the overall range. Based on the evidence, the subject's land assessment is supported and a reduction is not warranted.

In regard to the improvement assessment, the Board gives less weight to the board of review comparables which have dissimilar designs than the subject and/or differences in foundation type from the subject.

The Board finds the best evidence of improvement assessment equity to be the appellant's comparables, each of which is similar to the subject in design, age, dwelling size, and most features. These comparables have improvement assessments ranging from ranging from \$36,569 to \$45,656 or from \$34.96 to \$37.50 per square foot of living area. The subject's improvement assessment of 48,422 or \$40.05 per square foot of living area falls above the range established by the best comparables in this record and is excessive. The Board gives greatest weight to the appellant's comparable #5 which has an improvement assessment of \$44,631 or \$35.76 per square foot of living area and is most similar to the subject in age and dwelling size but would require adjustments for differences from the subject in bathroom count, fireplace count, and garage size. Based on the foregoing evidence and after considering appropriate adjustments to the equity comparables for differences when compared to the subject, the Board finds the

appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment based on assessment equity is justified.

Alternatively, 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). After an analysis of the comparable sales data and considering the reduction in the improvement assessment for assessment inequity, the Board finds that the subject property is now equitably assessed and no further reduction in the subject's assessment is warranted on grounds of overvaluation.

In conclusion, the Board finds the appellant demonstrated a lack of uniformity in the subject's improvement assessment by clear and convincing evidence. Therefore, the Board finds the subject property's improvement assessment as established by the board of review is incorrect and a reduction is 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.

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Chairman

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Member

Member

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Member

Member

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Member

Member

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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 18, 2025

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Clerk of the Property Tax Appeal Board

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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APPELLANT

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COUNTY

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