



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

APPELLANT: Rebecca Ayala Rios  
DOCKET NO.: 24-01681.001-R-1  
PARCEL NO.: 06-09-103-001

The parties of record before the Property Tax Appeal Board are Rebecca Ayala Rios, 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 **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:** \$16,937  
**IMPR.:** \$118,383  
**TOTAL:** \$135,320

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 2024 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 2,957 square feet of living area. The dwelling was constructed in 1976. Features of the home include a walk-out basement with finished area,<sup>1</sup> central air conditioning and a three-car garage with 700 square feet of building area.<sup>2</sup> The property has a 37,700 square foot site and is located in Round Lake Beach, Lake Villa Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant completed Section IV – Recent Sale Data of the appeal petition. The appellant

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<sup>1</sup> The Multiple Listing Service (MLS) printout submitted by the board of review disclosed the subject's walk-out basement is finished with a recreation area, exercise room, and full bathroom, which were not reported by nor refuted by the appellant.

<sup>2</sup> The board of review disclosed the subject property has a barn, which was not reported by nor was it refuted by the appellant.

reported that the subject was purchased on April 1, 2024 for \$392,500. The appellant disclosed the subject property was purchased from Jason Hopper, the parties to the transaction were not related, the property was sold by a realtor and had been advertised in the Multiple Listing Service (MLS) for a period of 45 days. The appellant also disclosed the property was not sold due to a foreclosure, nor was it sold using a contract for deed. To document the sale, the appellant submitted a settlement statement which reiterated the sale date of April 1, 2024 but depicted a sale price of \$406,000 and also disclosed the distribution of commissions.

In further support of the subject's overvaluation argument, the appellant submitted information of four comparable sales that are located from .31 to .83 of a mile from the subject property, two of which have the same assessment neighborhood code as the subject. The comparables have sites that range in size from 6,970 to 41,600 square feet of land area. The comparables are improved with one-story or two-story dwellings of wood siding exterior construction ranging in size from 2,679 to 4,252 square feet of living area. The dwellings were built from 1965 to 1994. The comparables have varying degrees of similarity when compared to the subject in foundation type and other features. The appellant reported that the four comparables sold from June 2021 to November 2022 for prices ranging from \$288,000 to \$325,000 or from \$76.43 to \$107.50 per square foot of living area, including land.<sup>3</sup>

The appellant also submitted a Market Summary Analysis for the subject property prepared by Elona Hamilton from Hamilton Group, Realtors, which did not depict an effective date of the report. Hamilton provided information on five comparable properties that have varying degrees of similarity when compared to the subject in location, dwelling size, design, age and features, where four of the five comparables were provided by the appellant in the comparable sales grid analysis of the appeal petition. The five properties sold from July 2021 to June 2022 for prices ranging from \$288,000 to \$334,000. Hamilton suggested a marketing price for the subject property of \$316,400.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$105,458, which would reflect a market value of \$316,406 or \$82.27 per square foot of living area, including land, when using 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 \$135,320. The subject's assessment reflects a market value of \$406,001 or \$105.56 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>4</sup>

In response to the appeal, the board of review submitted a memorandum noting the subject property sold on April 1, 2024 for \$406,000. In support of this claim, the board of review submitted copies of the Multiple Listing Service (MLS) printout the PTAX-203 Illinois Real

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<sup>3</sup> The MLS printout submitted with the Market Summary Analysis depicts the property located at 67 W Tall Grass, PIN 06-08-202-048, with 3,169 square feet of living area and the property sold on June 30, 2022 for \$334,000 or \$105.40 per square foot of living area, including land.

<sup>4</sup> 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 2024.

Estate Sales Declaration reiterating the sale date and sale price. The board of review also contended that the appellant's appeal petition incorrectly states a sale price of \$392,500. The board of review argued that the appellant's four comparable sales occurred in 2021 and 2022 and are clearly less reliable value indicators than the subject's own sale, which occurred within approximately 3 months from the January 1, 2024 assessment date.

Lastly, the board of review asserted that the Supreme Court has ruled that a contemporaneous sale of property between parties dealing at arm's length is a relevant factor in determining the correctness of an assessment and is practically conclusive on the issue on whether the assessment is reflective of market value Rosewell v. 2626 Lakeview Limited Partnership, 120 Ill.App.3d 369 (1st Dist. 1983), People ex rel. Munson v. Morningside Heights, Inc, 45 Ill.2d 338 (1970), People ex rel. Korzen v. Belt Railway Co. of Chicago, 37 Ill.2d 158 (1967); and People ex rel. Rhodes v. Turk, 391 Ill. 424 (1945).

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 record contains evidence of the subject's recent sale. The appellant also submitted four comparable sales and a Market Summary Analysis for the Board's consideration.

Initially, the Board has given little weight to the report prepared by Elona Hamilton from Hamilton Group, Realtors, as this document did not provide an effective date of the report. Furthermore, the report contained five sales that occurred in 2021 and 2022, less proximate to the January 1, 2024 assessment date and thus less likely to be indicative of the subject's market value as of the lien date at issue. Moreover, Hamilton suggested a marketing price of \$316,400 for the subject property, which is significantly less than its April 2024 purchase price of \$406,000 without explanation.

The Board has also given little weight to the appellant's four comparable sales, which have sale dates that occurred in 2021 or 2022, less proximate in time to the January 1, 2024 assessment date than the sale of the subject property which occurred within 4 months of the lien date at issue. Additionally, the comparables differ from the subject dwelling in age and/or size, and two comparables are dissimilar one-story designs, when compared to the subject's two-story design.

The Board finds the best evidence of market value to be the purchase of the subject property in April 2024 for a price of \$406,000. The record contains evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a Realtor, the property had been advertised on the open market with the Multiple Listing

Service and it had been on the market for 45 days. In further support of the transaction the appellant submitted a copy of the settlement statement and the board of review submitted a copy of the MLS printout and the PTAX-203 Illinois Real Estate Transfer Declaration, all depicting a sale price of \$406,000. The Board finds the purchase price is equivalent to the market value reflected by the assessment.

The Illinois Supreme Court has ruled that a contemporaneous sale of two parties dealing at arm's-length is not only relevant to the question of fair cash value but is practically conclusive on the issue of whether an assessment is reflective of market value. Korzen v. Belt Railway Co. of Chicago, 37 Ill.2d 158 (1967). Furthermore, **the sale of a property during the tax year in question** is a relevant factor in considering the validity of the assessment. Rosewell v. 2626 Lakeview Limited Partnership, 120 Ill.ap.3d 369m 375 (1<sup>st</sup> Dist. 1983) [Emphasis added]

Therefore, based on the evidence in this record the Board finds no reduction in the subject's assessment 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.



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:

April 21, 2026



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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