FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jorge & Beatriz Espinoza
DOCKET NO.: 25-00318.001-R-1
PARCEL NO.: 04-21-123-005

The parties of record before the Property Tax Appeal Board are Jorge & Beatriz Espinoza, the appellants; 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:	$8,261
IMPR.:	$65,017
TOTAL:	$73,278

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 2025 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 vinyl exterior construction with 1,248 square feet of above grade living area. The dwelling was constructed in approximately 1995 and is 30 years old. Features of the home include a finished lower level and a 400 square foot garage. The property has an approximately 6,820 square foot site and is located in Zion, Zion Township, Lake County.

The appellants' appeal is based on both overvaluation and assessment inequity, with respect to both the land and improvement assessments, as the bases of the appeal.

In support of both the overvaluation and inequity arguments, the appellants submitted information on four comparables located within 0.72 of a mile from the subject property. The comparables have sites ranging in size from 5,720 to 8,220 square feet of land area that are improved with bi-level or tri-level dwellings of brick, wood, vinyl or aluminum exterior construction ranging in size from 1,004 to 1,204 square feet of above grade living area. The dwellings range in age from 19 to 69 years old. Each comparable has a finished lower level and from a 440 to 624 square foot garage. Three dwellings have central air conditioning. The comparables sold from December 2022 to June 2024 for prices ranging from $200,000 to $290,000 or from $174.37 to $282.65 per square foot of above grade living area, land included. The comparables have land assessments ranging from $6,932 to $9,756 or $1.19 and $1.21 per square foot of land area. The comparables have improvement assessments ranging from $48,654 to $78,295 or from $42.42 to $69.83 per square foot of above grade living area.

The appellants also submitted written comments, multiple printouts from a real estate website and photographs of the subject and comparable properties along with a second grid analysis of their comparables labeled "Lake County, IL Property Tax Information." The appellants stated they added a fence and solar panels to the subject property and noted the subject does not have central air conditioning. Photographs of the subject property depict average kitchen, bathroom and flooring condition. Printouts and photographs of the comparable properties depict comparable #1 has an updated kitchen, bathroom and flooring; comparable #2 has a similar kitchen and bath features as the subject with newer laminate flooring; comparable #3 has some kitchen updates, one updated bathroom and newer laminate flooring; while comparable #4 has a similar kitchen and one updated bathroom.

The appellants also submitted evidence their comparable #1 sold in August 2024 for a price of $182,000 and then in May 2025 for $290,000 after being remodeled while comparable #2 sold in January 2024 for $165,000 and was resold in August 2024 for $265,000 after updates.

Based on this evidence, the appellants requested the subject's total assessment be reduced to $49,995. The requested assessment reflects a total market value of $150,000 or $120.19 per square foot of above grade living area, land included, when applying the statutory level of assessment of 33.33%. The request would lower the subject's land assessment to $6,666 or $0.98 per square foot of land area and the improvement assessment to $43,329 or $34.72 per square foot of above grade living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $73,278. The subject's assessment reflects a market value of $219,856 or $176.17 per square foot of above grade living area, including land, when applying the statutory level of assessment of 33.33%. The subject has a land assessment of $8,261 or $1.21 per square foot of land area and an improvement assessment of $65,017 or $52.10 per square foot of above grade living area.

In support of its contention of the correct assessment on market value and equity grounds, the board of review submitted information on four comparables located within 0.72 of a mile from the subject property. Board of review comparable #3 is the same property as the appellants' comparable #3. The comparables have sites ranging in size from 2,037 to 8,843 square feet of land area and are improved with tri-level dwellings of aluminum or vinyl siding exterior construction ranging in size from 1,004 to 1,156 square feet of above grade living area. The dwellings range in age from 28 to 38 years old. Each comparable has a finished lower level and from a 484 to 576 square foot garage. Comparables #3 and #4 sold in October 2024 and July 2025 for prices of $267,000 and $270,000 or $233.39 and $268.92 per square foot of above grade living area, land included. The comparables have land assessments that range from $4,049 to $9,558 or from $1.08 to $1.99 per square foot of land area and improvement assessments ranging from $55,376 to $62,591 or from $52.41 to $55.30 per square foot of above grade living area.

Based on this evidence, the board of review requested the subject's assessment be confirmed.

In written rebuttal, the appellants critiqued the board of review's comparables arguing all four properties have "lower assessments" than the subject property. Furthermore, the appellants asserted the board of review comparables #3 and #4 are updated properties. Finally, the appellants contended the board of review failed to provide three comparable sales as instructed in Section V of the appeal petition.

Conclusion of Law

Initially, the Board finds the appellants filing the appeal have the burden of proof that the subject property's assessment is not reflective of market value or is assessed inequitably. The Property Tax Appeal Board's appeal petition requires the appellants to submit no less than three comparable properties in support of the basis of their appeal. However, the board of review is not bound by this requirement.

The appellants contend, in part, 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains five comparable sales for the Board's consideration, as one property was common to both parties. The Board gives reduced weight to appellants' comparables #1, #3 and #4 along with board of review comparable #3 which are less similar to the subject in age, dwelling size and/or sold less proximate in time to the January 1, 2025 assessment date.

The Board finds the best evidence of market value to be appellants' comparable #2 and board of review comparable #4 which sold proximate to the assessment date at issue and are more similar to the subject in location, age, site size, dwelling size and most features. However, these properties each have a larger garage size and feature central air conditioning, when compared to the subject, suggesting downward adjustments are needed to make these properties more equivalent to the subject. These two comparables sold in June and October 2024 for prices of $265,000 and $267,000 or $219.55 and $233.39 per square foot of above grade living area, including land. The subject's assessment reflects a market value of $219,856 or $176.17 per square foot of above grade living area, including land, falls below the two best comparable sales in this record which appears logical. Therefore, after considering adjustments to the two best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment, based on overvaluation, is not justified.

The appellants also contend assessment inequity as an alternative 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 Board finds the appellants did not meet this burden of proof and a reduction in the subject's assessment, based on assessment inequity is not warranted.

The record contains seven equity comparables for the Board's consideration as one property was common to both parties.

With respect to the equity argument for the subject's land assessment, the Board gives less weight to appellants' comparable #1 and #3 and board of review comparables #1, #2 and #3 which are less similar to the subject in site size than other properties in the record. The Board finds the best evidence of land assessment equity to be appellants' comparable #2 and #4 along with board of review comparable #4, which are more similar to the subject in location and site size. These best comparables have land assessments of $7,280 to $8,788 or $1.21 per square foot of land area. The subject property has a land assessment of $8,261 or $1.21 per square foot of land area which is the same per square foot land assessment established by the best land comparables in the record. After considering adjustments to the comparables for differences from the subject, the Board finds a reduction in the subject's land assessment is not supported.

As to the subject's improvement assessment, the Board gives less weight to appellants' comparables #1, #3 and #4 along with board of review comparables #1 and #3, including the common property, which are less similar to the subject in age and/or dwelling size. The Board finds the best evidence of improvement assessment equity to be appellants' comparable #2 and board of review comparables #2 and #4 which are more similar to the subject in location, age, dwelling size and some features. However, these properties each have larger garage size and two of these properties have central air conditioning, which the subject property lacks, suggesting downward adjustments are needed to account for these differences with the subject. These best comparables have improvement assessments ranging from $60,587 to $78,295 or from $52.41 to $64.87 per square foot of above grade living area. The subject's improvement assessment of $65,017 or $52.10 per square foot of above grade living area falls within the range established by the best comparables in this record on an overall improvement assessment basis and below the range on a per square foot basis.

After considering adjustments to the comparables for differences from the subject, the Board finds the appellants did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's improvement assessment is not justified.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill.2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which appears to exist on the basis of the evidence in this record.

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:

C E R T I F I C A T I O N

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: July 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

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