



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

APPELLANT: Edward Angelbeck  
DOCKET NO.: 16-04649.001-R-1  
PARCEL NO.: 16-09-112-005

The parties of record before the Property Tax Appeal Board are Edward Angelbeck, the appellant, by attorney Robert Rosenfeld of Robert H. Rosenfeld and Associates, LLC in Chicago; 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:** \$111,687  
**IMPR.:** \$142,194  
**TOTAL:** \$253,881

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 2016 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 2,740 square feet of living area. The dwelling was constructed in 1934. Features of the home include a 95 square foot unfinished basement, central air conditioning, two fireplaces and a 580 square foot garage. The property has a 20,567 square foot site and is located in Lake Forest, West Deerfield 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 from .12 to .79 of a mile from the subject. The comparables consist of two-story dwellings of brick or frame exterior construction ranging in size from 2,524 to 2,979 square feet of living area. The dwellings were constructed from 1947 to 1959. One comparable has a slab foundation and two comparables have a basement, one of which has finished area. Two comparables have central air conditioning

and one comparable has three fireplaces. The comparables each have a garage ranging in size from 441 to 594 square feet of building area. One comparable has a site with 16,779 square feet of land area. The appellant failed to provide the land size of the other two comparables. The comparables sold from February 2015 to June 2016 for prices ranging from \$585,000 to \$805,000 or from \$220.75 to \$270.22 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$253,881. The subject's assessment reflects a market value of \$765,624 or \$279.42 per square foot of living area, land included, when using the 2016 three-year average median level of assessment for Lake County of 33.16% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located from .12 to .36 of a mile from the subject property, three of which are in the same neighborhood as the subject as defined by the local assessor. Board of review comparable #3 and the appellant's comparable #3 are the same property. The comparables are improved with two-story dwellings of brick, frame or brick and frame exterior construction ranging in size from 2,596 to 3,362 square feet of living area. The dwellings were constructed from 1927 to 1947. Each comparable has a basement, two of which have finished area. Two comparables have central air conditioning. Each comparable has one to four fireplaces and a garage ranging in size from 420 to 1,175 square feet of building area. The comparables have sites ranging in size from 20,972 to 37,310 square feet of land area. These properties sold from January 2014 to June 2017 for prices ranging from \$765,375 to \$1,099,000 or from \$265.47 to \$349.44 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 no reduction in the subject's assessment is warranted.

The parties submitted six suggested comparable sales for the Board's consideration. The Board gave less weight to comparables #1 and #2 submitted by the appellant due to their locations outside of the subject's neighborhood and their dissimilar design and age when compared to the subject. The Board also gave less weight to board of review comparables #1 and #4 as their sale dates in January 2014 and June 2017 are remote in time in relation to the January 1, 2016 assessment date and less likely to reflect the subject's market value as of the lien date.

The Board finds the best evidence of market value to be the parties common comparable and board of review comparable #2. These two comparables are similar to the subject in location, design and age, but have varying degrees of similarity to the subject in size and features. These comparables sold in July 2014 and August 2015 for prices of \$805,000 and \$892,500 or \$265.47

and \$270.22 per square foot of living area, including land. The subject is inferior to the parties common comparable in that it is smaller in dwelling size, lacks finished basement area and has fewer fireplaces, however, it is superior in that it has central air conditioning. The Board recognizes that board of review comparable #2 has a slightly dated sale and that the subject is inferior in dwelling size, basement area, number of fireplaces, garage size and land area. The subject's assessment reflects a market value of \$765,624 or \$279.42 per square foot of living area, including land, which falls below the best comparable sales established in this record on a total market value basis and above on a per square foot basis. As to the subject's slightly higher per square foot value, the Board finds that accepted real estate valuation theory provides, all other factors being equal, as the size of a property increases, its per unit value decreases. Likewise, as the size of a property decreases, its per unit value increases. Based on this analysis, the Board finds the subject's higher per square foot value is well justified given its smaller size. Therefore, based on this evidence 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: March 19, 2019



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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Edward Angelbeck, by attorney:  
Robert Rosenfeld  
Robert H. Rosenfeld and Associates, LLC  
33 North Dearborn Street  
Suite 1850  
Chicago, IL 60602

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085