



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

APPELLANT: Joan Cortesi
DOCKET NO.: 17-03172.001-R-1
PARCEL NO.: 16-08-208-001

The parties of record before the Property Tax Appeal Board are Joan Cortesi, 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: \$78,183
IMPR.: \$262,730
TOTAL: \$340,913

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 2017 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 2-story dwelling of wood siding exterior construction with 4,919 square feet of living area. The dwelling was constructed in 1968 with an effective age of 1984. Features of the home include a partial basement with finished area, central air conditioning, a fireplace, four full and one half bathrooms, a 576 square foot open frame porch, and a 494 square foot attached garage. The subject property also has an 800 square foot inground swimming pool. The property is located in Lake Forest, West Deerfield Township, Lake County.

The appellant contends assessment inequity with respect to the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables located within 0.28 of a mile from the subject property and where each of the comparables are located in the subject's neighborhood code as assigned by the township

assessor. The comparable sites are improved with 2-story dwellings of brick or wood siding exterior construction that range in size from 4,091 to 4,553 square feet of living area. The homes were built from 1985 to 1988. Each comparable has an unfinished basement, two full and one half bathroom, central air conditioning, one fireplace and a garage ranging in size from 506 to 786 square feet of building area. One comparable has a 112 square foot porch. The comparables have improvement assessments that range from \$177,311 to \$194,093 or from \$42.54 to \$47.34 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$218,436 or \$44.41 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$340,913. The subject property has an improvement assessment of \$262,730 or \$53.41 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables located within approximately 0.94 of a mile from the subject property and where none of the comparables are located within the same neighborhood code as the subject. The comparable sites are improved with one 1.75-story and three 2-story dwellings of brick exterior construction that range in size from 4,573 to 5,404 square feet of living area. The homes were built from 1960 to 1983. Each comparable has a basement, three with finished area, central air conditioning, one to three fireplaces and a garage ranging in size from 598 to 1,128 square feet of building area. The comparables have bathroom counts that range from three to six full in addition to each having one half bathroom. Comparable #1 has a 1,014 square foot concrete patio and comparable #4 has three concrete or brick patios which range in size from 360 to 1,125 square feet of area. The comparables have improvement assessments that range from \$247,686 to \$316,448 or from \$53.37 to \$58.56 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

Conclusion of Law

The taxpayer contends assessment inequity as the 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 appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted seven comparables for the Board's consideration. The Board gives less weight to the board of review's comparables due to their location outside of the subject's neighborhood. The Board finds the best evidence of assessment equity to be appellant's comparables which are similar in location, design, dwelling size and effective age. These comparables had improvement assessments that ranged from \$177,311 to \$194,093 or from \$42.54 to \$47.34 per square foot of living area. The subject's improvement assessment of \$262,730 or \$53.41 per square foot of living area falls above the range which is supported based on the subject being superior to the comparables in bathroom count, finished basement, inground swimming pool and/or larger porch area. After considering adjustments to the comparables for differences with the subject, the Board finds the appellant did not demonstrate with clear and

convincing evidence that the subject's improvement was inequitably assessed and 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: July 21, 2020



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

Joan Cortesi, 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