



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

APPELLANT: Famous Frierson
DOCKET NO.: 18-01723.001-R-1
PARCEL NO.: 04-28-109-005

The parties of record before the Property Tax Appeal Board are Famous Frierson, the appellant, by attorney Sreeram Natarajan, of Natarajan Worstell 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: \$4,556
IMPR.: \$33,530
TOTAL: \$38,086

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 2018 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 one-story dwelling of vinyl siding exterior construction with 1,092 square feet of living area. The dwelling was constructed in 1992. Features of the home include an unfinished basement, central air conditioning and a 480 square foot garage. The property has a 9,000 square foot site and is located in Zion, Zion 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 five equity comparables located in the same neighborhood code as the subject property. The comparables are improved with one-story dwellings of wood or aluminum siding exterior construction that range in size from 1,092 to 1,176 square feet of living area. The homes were built from 1988 to 1992. One comparable has an unfinished basement and four comparables lack a basement. Four comparables have central air conditioning and one comparable has a garage

with 672 square feet of building area. The comparables have improvement assessments ranging from \$17,700 to \$25,706 or from \$15.05 to \$21.86 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$21,862 or \$20.02 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 \$38,086. The subject property has an improvement assessment of \$33,530 or \$30.71 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 in the same neighborhood code as the subject. The comparables are improved with one-story dwellings of wood or aluminum siding exterior construction that range in size from 1,064 to 1,176 square feet of living area. The homes were built from 1986 to 2004. Each comparable has an unfinished basement and a garage ranging in size from 440 to 672 square feet of building area. Two of the comparables each have central air conditioning. The comparables have improvement assessments that range from \$32,173 to \$36,768 or from \$30.10 to \$31.27 per square foot of living area. The board of review included comment on their grid analysis noting that three of the appellant's comparables lacked a garage. Based on this evidence, the board of review requested the subject's assessments 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 nine equity comparables for the Board's consideration. The Board gave less weight to the appellant's comparables #2, #3, #4 and #5 which lack a basement and a garage features that are present in the subject improvements. The Board gave less weight to board of review comparable #2 due to its newer age when compared to the subject.

The Board finds the best evidence of assessment equity to be appellant's comparable #1 along with board of review comparables #1, #3 and #4 which are more similar to the subject in terms of location, age, design, basement and garage. Two of these best comparables lack central air conditioning suggesting an upward adjustment when compared to the subject which includes central air conditioning. These comparables had improvement assessments that ranged from \$17,700 to \$35,944 or from \$15.05 to \$30.56 per square foot of living area. The subject's improvement assessment of \$33,530 or \$30.71 per square foot of living area falls within the value range and just above the per square foot range established by the best comparables in this record. 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: November 17, 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

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