



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

APPELLANT: Rudy Sabbagha  
DOCKET NO.: 18-01966.001-R-1  
PARCEL NO.: 16-06-203-012

The parties of record before the Property Tax Appeal Board are Rudy Sabbagha, 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:** \$182,667  
**IMPR.:** \$323,564  
**TOTAL:** \$506,231

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 2-story dwelling of brick exterior construction with 5,770 square feet of living area. The dwelling was constructed in 1996. Features of the home include an unfinished basement, central air conditioning, two fireplaces and a 1,032 square foot garage. The property has a 59,242 square foot site and is located in Lake Forest, West Deerfield Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on three equity comparables located within the same assessment neighborhood as the subject and from .21 to .30 of a mile from the subject property. The comparables consist of 2-story dwellings of brick exterior construction ranging in size from 5,114 to 6,018 square feet of living area. The dwellings were built from 1998 to 2000. Each comparable features a basement with finished

area, central air conditioning, two or three fireplaces and a garage ranging in size from 658 to 1,148 square feet of building area. Comparable #2 has a 612 square foot inground swimming pool. The comparables have improvement assessments ranging from \$222,016 to \$269,551 or from \$36.89 to \$46.56 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$246,975 or \$42.80 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 \$506,231. The subject property has an improvement assessment of \$323,564 or \$56.08 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on eight equity comparables located within the same assessment neighborhood as the subject and from .173 to .374 of a mile from the subject property. The comparables consist of a 1.75-story dwelling and five, 2-story dwellings of brick or wood siding exterior construction ranging in size from 4,950 to 5,821 square feet of living area. The dwellings were built from 1997 to 2007. Each comparable features a basement with four having finished area, central air conditioning, one to four fireplaces and one or two garages with sizes totaling 732 to 1,232 square feet of building area. The comparables have improvement assessments ranging from \$330,016 to \$389,935 or from \$58.29 to \$72.81 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be sustained.

### **Conclusion of Law**

The appellant 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 no reduction in the subject's assessment is warranted.

The parties submitted eleven suggested equity comparables for the Board's consideration. The Board gave less weight to the appellant's three comparables, along with board of review comparables #1, #3, #4, #6, #7 and #8 which differ from the subject in dwelling size, design, age, basement finish and/or have an inground swimming pool unlike the subject.

The Board finds the best evidence of assessment equity to be board of review comparables #2 and #5. These two comparables are similar to the subject in location, dwelling size, design, age and features. They have improvement assessments of \$389,935 and \$371,886 or \$68.19 and \$63.89 per square foot of living area, respectively. The subject property has an improvement assessment of \$323,564 or \$56.08 per square foot of living area, which is below the two most similar comparables in this record. Based on this record 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:

December 15, 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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