



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

APPELLANT: Michael Ranker  
DOCKET NO.: 19-03708.001-R-1  
PARCEL NO.: 16-05-202-103

The parties of record before the Property Tax Appeal Board are Michael Ranker, 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 ***a reduction*** 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:** \$100,982  
**IMPR.:** \$207,890  
**TOTAL:** \$308,872

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 2019 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 4,246 square feet of living area. The dwelling was constructed in 1986 and is approximately 33 years old. The home features a full unfinished basement, central air conditioning, a fireplace, and a 720-square foot attached garage. The property has a 24,289-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 in the same assessment neighborhood code as the subject property. The comparables have sites ranging in size from 21,213 to 27,712 square feet of land area and are improved with 2-story or 1.8-story dwellings with brick or wood siding exterior construction that range in size from 3,128 to 4,222 square feet of living area. The dwellings range in age from 31 to 34 years old and are each described as

having a full or partial basement, one with finished area. The comparables each feature central air conditioning, one or two fireplaces, and an attached garage ranging in size from 462 to 759 square feet of building area. The comparables sold from April 2017 to May 2018 for prices ranging from \$650,000 to \$940,000 or from \$207.80 to \$233.66 per square foot of living area, including land. The appellant provided photos of the subject and the comparables, along with a brief prepared by appellant's counsel. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$308,872 which would reflect a market value of \$926,709 or \$218.25 per square foot of living area, land included, at the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$345,307. The subject's assessment reflects a market value of \$1,049,884 or \$247.26 per square foot of living area, land included, when using the 2019 three-year average median level of assessment for Lake County of 32.89% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located in the same assessment neighborhood code as the subject property. The comparables are improved with 2-story dwellings with brick or wood siding exterior construction that range in size from 3,350 to 3,914 square feet of living area. The board of review did not disclose the site sizes of its three comparables nor did it provide copies of the property record cards for its comparables. The dwellings were built from 1984 to 1986. Two comparables each feature an unfinished basement and one comparable has a concrete slab foundation. Each comparable has central air conditioning, one or two fireplaces, and an attached garage containing either 644 or 704 square feet of building area. Comparable #3 also features a reinforced concrete swimming pool. The comparables sold from May to August 2018 for prices ranging from \$998,000 to \$1,070,000 or from \$254.98 to \$298.51 per square foot of living area, including land. The board of review also submitted the property record card for the subject property. Based on this evidence, the board of review requested that the assessment be sustained.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the parties submitted a total of six comparable sales for the Board's consideration. The Board gave less weight to appellant's comparable #1 and board of review comparables #2 and #3 based on their considerably smaller dwelling sizes being from 15% to 30% smaller in dwelling size relative to the subject. Additionally, board of review comparable #2 has a concrete slab foundation, dissimilar to the subject's full basement, and board of review comparable #3 has a concrete swimming pool feature which the subject lacks. Furthermore, the Board gave reduced weight to the board of review comparables as the board of review did not

provide site sizes for its comparables making it difficult to conduct a meaningful comparative analysis of this overvaluation/market value claim.

The Board finds the best evidence of market value to be appellant's comparables #2 and #3 which are most similar to the subject in location, age, dwelling size, foundation, and most features. These best comparables in the record sold in April 2017 and May 2018 for prices of \$940,000 and \$900,000 or for \$233.66 and \$213.17 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$1,049,884 or \$247.26 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. After considering adjustments to the comparables for differences from the subject, the Board finds that the subject property is over-assessed and, therefore, a reduction in the subject's assessment commensurate with the appellant's request 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: December 21, 2021



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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