



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

APPELLANT: Samuel & Andrea Solomon
DOCKET NO.: 19-03873.001-R-1
PARCEL NO.: 16-34-108-013

The parties of record before the Property Tax Appeal Board are Samuel & Andrea Solomon, the appellants, 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: \$70,665
IMPR.: \$101,366
TOTAL: \$172,031

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 1.5-story dwelling of wood siding exterior construction with 2,265 square feet of living area. The dwelling was constructed in 1963 and is approximately 56 years old. Features of the home include a concrete slab foundation, central air conditioning, a fireplace, and a 462 square foot garage. The property has a 12,400 square foot site and is located in Deerfield, Moraine Township, Lake County.

The appellants contend assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellants submitted information on three equity comparables located within the same assessment neighborhood code as the subject. The comparables are improved with 1.5-story dwellings of wood siding exterior construction that range in size from 1,845 to 4,171 square feet of living area and are either 56 or 58 years old. The comparables each have a concrete slab or crawl space foundation; two comparables have central

air conditioning; and each comparable has one or two fireplaces and a garage ranging in size from 484 to 528 square feet of building area. The comparables have improvement assessments ranging from \$78,344 to \$162,707 or from \$39.01 to \$42.46 per square foot of living area. Based on this evidence, the appellants requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$172,031. The subject has an improvement assessment of \$101,366 or \$44.75 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 that are located within the same assessment neighborhood code as the subject. The comparables are improved with a 1.75-story and three, 1.5-story dwellings of brick or brick and wood siding exterior construction that range in size from 2,147 to 2,728 square feet of living area and were built from 1964 to 1967 years old. Three comparables have unfinished basements and one comparable has a crawl space foundation. Each comparable has central air conditioning, one or two fireplaces, and a garage ranging in size from 506 to 572 square feet of building area. The comparables have improvement assessments ranging from \$101,176 to \$144,691 or from \$47.12 to \$53.04 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted seven equity comparables for the Board's consideration. The Board gave less weight to appellants' comparable #1 due to its significantly larger dwelling size when compared to the subject. The Board also gave less weight to board of review comparables #1, #3 and #4 which have basement foundations unlike the subject's crawl space foundation.

The Board finds the best evidence of assessment equity to be appellants' comparables #2 and #3 along with board of review comparable #2 which are relatively similar to the subject in location, design, age, dwelling size and some features. These comparables have improvement assessments ranging from \$78,344 to \$107,847 or from \$41.45 to \$47.12 per square foot of living area. The subject has an improvement assessment of \$101,366 or \$44.75 per square foot of living area, which is within the range established by the best comparables in this record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellants did not prove by 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 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

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

APPELLANT

Samuel & Andrea Solomon, 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