



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

APPELLANT: Kathryn Cole
DOCKET NO.: 19-05901.001-R-1
PARCEL NO.: 16-03-202-011

The parties of record before the Property Tax Appeal Board are Kathryn Cole, 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: \$212,178
IMPR.: \$207,151
TOTAL: \$419,329

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 ranch style dwelling of brick exterior construction with 4,646 square feet of living area. The dwelling was constructed in 1960. Features of the home include a full basement with a 2,085 square foot recreation room, central air conditioning, two fireplaces, and a 675 square foot garage. The property has a 41,463 square foot site¹ and is located in Lake Forest, Moraine Township, Lake County.

The appellant contends assessment inequity concerning the improvement assessment as the basis of the appeal; no dispute was raised concerning the land assessment. In support of this argument the appellant submitted information on four equity comparables improved with ranch style homes of brick, wood siding, or stone exterior construction ranging in size from 2,886 to 3,743

¹ The parties differ as to the square footage of the subject property. The Board finds the best description of the subject property is found in the property record card presented by the board of review.

square feet of living area. The dwellings range from 58 to 71 years old. The homes each have central air conditioning, one or two fireplaces, and a garage ranging in size from 418 to 927 square feet of building area. One of the comparables has an unfinished basement. The comparables are located within 0.60 of a mile from the subject property and are within the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$110,641 to \$144,058 or from \$37.81 to \$38.88 per square foot of living area. Based upon this evidence, the appellant requested the subject property's improvement assessment be reduced to \$178,522 or \$38.43 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 \$419,329. The subject property has an improvement assessment of \$207,151 or \$44.59 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 improved with ranch style homes of brick or wood siding and brick exterior construction ranging in size from 3,847 to 4,669 square feet of living area. The dwellings were built from 1953 to 1961 and have reported effective ages from 1965 to 1972. The homes each have a basement, three of which have finished area ranging in size from 470 to 1,008 square feet, central air conditioning, one to three fireplaces, and a garage ranging in size from 884 to 1,172 square feet of building area. The comparables are located within 0.59 of a mile of the subject property and are within the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$181,979 to \$205,390 or from \$43.99 to \$47.51 per square foot of living area. Based upon this evidence, the board of review requested confirmation of the subject property's assessment.

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 record does not establish that a reduction in the subject's assessment is warranted.

The record contains a total of eight comparables for the Board's consideration. The Board gives less weight to the appellant's comparables and the board of review's comparable #4, which each have considerably a smaller home than the subject and do not have any finished basement area like the subject dwelling features.

The Board finds the best evidence of assessment equity to be the board of review's comparables #1, #2, and #3, which are similar to the subject property in size, age, location, and most features. These comparables have improvement assessments ranging from \$192,796 to \$205,390 or from \$43.99 to \$47.51 per square foot of living area. The subject's improvement assessment of \$207,151 or \$44.59 per square foot of living area falls above the range based on the total improvement assessment of the best comparables in this record but falls within the range of the

best comparables on a per square foot basis. The subject has a 2,085 square foot recreation room, whereas the board of review's comparables #1, #2 and #3 each have much smaller recreation rooms ranging from 470 to 1,008 square feet of finished area. Based on this record, and after considering appropriate adjustments for differences, such as dwelling size and/or finished basement area, the Board finds the record 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: January 18, 2022



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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