



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

APPELLANT: Dee Kahnweiler-Levenson  
DOCKET NO.: 19-05971.001-R-1  
PARCEL NO.: 16-36-210-023

The parties of record before the Property Tax Appeal Board are Dee Kahnweiler-Levenson, 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:** \$112,773  
**IMPR.:** \$61,818  
**TOTAL:** \$174,591

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 one-story dwelling of brick exterior construction with 2,067 square feet of living area. The dwelling was constructed in 1948 and is approximately 71 years old. The dwelling has a reported effective age of 1952. Features of the home include a concrete slab foundation, central air conditioning, two fireplaces and a 518 square foot attached garage. The property has a 15,260 square foot site and is located in Highland Park, Moraine 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 four equity comparables located within the same assessment neighborhood code as the subject property. The comparables are improved with one-story dwellings of brick or wood siding exterior construction ranging in size from 1,136 to 4,332 square feet of living area. The dwellings range in age from

68 to 96 years old. Each comparable has a concrete slab foundation, three comparables have central air conditioning and each comparable has one or two fireplaces. The appellant reported that two comparables each have an attached garage containing either 440 or 621 square feet of building area and two comparables each have none/518 garages. The comparables have improvement assessments that range from \$26,644 to \$115,817 or from \$15.44 to \$26.74 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$53,648 or \$25.96 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 \$174,591. The subject property has an improvement assessment of \$61,818 or \$29.91 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 within the same assessment neighborhood code as the subject property. The comparables are improved with one-story dwellings of brick and wood siding exterior construction ranging in size from 1,997 to 2,188 square feet of living area. The dwellings were built from 1946 to 1953 with comparable #1 having reported effective age of 1961. The board of review reported that one comparable has a crawl space foundation and three comparables each have a basement, two of which have recreation rooms. The comparables each have central air conditioning and a fireplace. Three comparables each have an attached garage that ranges in size from 396 to 729 square feet of building area. The comparables have improvement assessments that range from \$57,761 to \$97,064 or from \$28.92 to \$44.36 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 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 record contains a total of eight suggested equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #3 and #4 which differ from the subject in dwelling size and/or age. The Board gives reduced weight to board of review comparables #1, #3 and #4 as each dwelling has a basement in contrast to the subject dwelling's concrete slab foundation.

The Board finds the best evidence of assessment equity to be the appellant's comparable #2 and board of review comparable #2. These two properties are similar to the subject in location, dwelling size, design and age. However, the Board finds that each comparable has fewer fireplaces than the subject and neither comparable has a garage like the subject. The comparables have improvement assessments of \$55,041 and \$57,761 or \$26.36 and \$28.92 per square foot of living area, respectively. The subject's improvement assessment of \$61,818 or \$29.91 per square foot of living area is greater than the two best comparables in the record but

appears to be justified given its superior features. Based on this record and after considering adjustments to the comparables for differences when compared to 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:

February 15, 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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