



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

APPELLANT: Jane Williams
DOCKET NO.: 19-06014.001-R-1
PARCEL NO.: 16-05-407-021

The parties of record before the Property Tax Appeal Board are Jane Williams, 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: \$93,267
IMPR.: \$239,755
TOTAL: \$333,022

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 4,104 square feet of living area. The dwelling was constructed in 1985 and is approximately 34 years old. Features of the home include an unfinished basement, central air conditioning, a fireplace, and a 672 square foot garage. The property has a 15,611 square foot site and is located in Lake Forest, West Deerfield 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 1.8-story to 2-story homes of brick or wood siding exterior construction ranging in size from 3,171 to 4,628 square feet of living area. The dwellings are from 32 to 38 years old. The homes each have a basement, one of which has finished area, central air conditioning, one or two fireplaces, and a

garage ranging in size from 483 to 650 square feet of building area. The comparables are located from 0.10 to 0.32 of a mile from the subject property and within the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$167,222 to \$251,490 or from \$52.15 to \$55.44 per square foot of living area. Based upon this evidence, the appellant requested the subject property's improvement assessment be reduced to \$221,862 or \$54.06 per square foot of living area.¹

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$333,022. The subject property has an improvement assessment of \$239,755 or \$58.42 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables improved with two-story homes of brick exterior construction ranging in size from 3,976 to 4,155 square feet of living area. The dwellings were built in 1986 or 1987. The homes each have a basement, one of which has a recreation room, central air conditioning, one or two fireplaces, and a garage ranging in size from 759 to 925 square feet of building area. The comparables are located from 0.10 to 0.27 of a mile from the subject property and within the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$241,715 to \$255,555 or from \$59.65 to \$64.27 per square foot of living area.

The board of review also submitted a copy of the grid analysis of the appellant's comparables, with notes stating that the appellant's comparable #4 was a foreclosure sold in an "As Is" condition. The board of review submitted a listing sheet for the appellant's comparable #4 disclosing that the property was listed for sale on the Multiple Listing Service and sold through a realtor although the property was "REO/Lender Owned."

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

¹ The appellant initially requested a reduction in the subject's improvement assessment to \$221,862 or \$54.06 per square foot of living area, but the appellant's amended Residential Appeal petition seeks an improvement assessment of -\$93.267. Because assessment requests may not present negative numbers, the Board is analyzing the original request herein.

The record contains a total of seven comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1 and #4, which each have a 1.8-story design compared to the subject's 2-story design, and the appellant's comparables #2 and #3, which each differ in dwelling size from the subject dwelling. The Board gives less weight to the board of review's comparable #3, due to its recreation room compared to the subject's unfinished basement.

The Board finds the best evidence of assessment equity to be the board of review's comparables #1 and #2, which are similar to the subject in style, construction, dwelling size, age, location, and most features. These comparables have improvement assessments of \$241,715 and \$253,478 or \$59.65 and \$61.01 per square foot of living area, respectively. The subject's improvement assessment of \$239,755 or \$58.42 per square foot of living area falls just below the best comparables in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences, 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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