



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

APPELLANT: Steven Keller  
DOCKET NO.: 19-06057.001-R-1  
PARCEL NO.: 16-35-103-009

The parties of record before the Property Tax Appeal Board are Steven Keller, 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:** \$57,269  
**IMPR.:** \$81,719  
**TOTAL:** \$138,988

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 containing 2,052 square feet of living area. The dwelling was constructed in 1954 and is approximately 65 years old. Features of the home include a crawl space foundation, central air conditioning, one fireplace and an attached garage with 462 square feet of building area. The property has a site with approximately 28,140 square feet of land area 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 improved with one-story dwellings of brick or wood siding exterior construction ranging in size from 2,052 to 2,128 square feet of living area. The homes range in age from 63 to 79 years old. It appears that each comparable has a crawl space foundation with two

comparables also having partial basements. Each property has central air conditioning and one fireplace. Three comparables have either an attached or detached garage ranging in size from 294 to 484 square feet of building area. Each comparable has a different assessment neighborhood code than the subject property. The comparables have improvement assessments ranging from \$50,363 to \$57,678 or from \$24.48 to \$27.19 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$52,597.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$138,988. The subject property has an improvement assessment of \$81,719 or \$39.82 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on five equity comparables improved with one-story dwellings of wood siding, brick, or brick and wood siding exterior construction ranging in size from 1,902 to 2,320 square feet of living area. The homes were built from 1954 to 1964. One comparable has a slab foundation, one comparable has a partial basement and a partial slab foundation, and three comparables have full basements with two having recreation rooms. Each property has central air conditioning, four comparables have one fireplace, and each property has an attached garage ranging in size from 418 to 520 square feet of building area. Comparable #3 has an inground swimming pool. The comparables have the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$76,510 to \$115,175 or from \$40.23 to \$53.16 per square foot of living area.

### **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 nine comparables submitted by the parties to support their respective positions. The Board gives less weight to the appellant's comparables due to differences from the subject in location as each property has a different neighborhood code than the subject property. The Board gives less weight to board of review comparables #3, #4 and #5 as each has a full basement, two with finished area, which is superior to the subject's crawl space foundation. Additionally, board of review comparable #3 has an inground pool, a feature the subject does not have. The Board finds the best evidence of assessment equity to be the comparables #1 and #2 submitted by the board of review, each with a slab foundation or partial basement but similar to the subject in other aspects. These properties have improvement assessments of \$76,510 and \$97,034 or \$40.23 and \$41.83 per square foot of living area, respectively. The subject's improvement assessment of \$81,719 or \$39.82 per square foot of living area falls within these two properties on an overall basis but below the comparables on a per square foot basis. Based on this record 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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