



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

APPELLANT: Carl Coulson a/k/a CND Property Management III LLC  
DOCKET NO.: 19-06408.001-R-1  
PARCEL NO.: 07-30-207-026

The parties of record before the Property Tax Appeal Board are Carl Coulson a/k/a CND Property Management III LLC, 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:** \$8,585  
**IMPR.:** \$35,282  
**TOTAL:** \$43,867

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 frame exterior construction with 1,432 square feet of living area. The dwelling was constructed in 1950 and is 69 years old. Features of the home include a crawl-space foundation, a fireplace and a detached 400 square foot garage. The property has an approximately 11,500 square foot site and is located in Grayslake, Warren Township, Lake County.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on three equity comparables located in the same assessment neighborhood code as the subject. The comparables consist of one-story dwellings of frame exterior construction that range in age from 91 to 96 years old. The homes range in size from 1,007 to 1,342 square feet of living area. One comparable has a partial basement and two dwellings have crawl-space foundations. The garage

information indicates two dwellings have attached garages of 242 and 288 square feet of building area and comparable #3 is reported as "none/288" in the garage/carport data. The comparables have improvement assessments ranging from \$16,428 to \$26,037 or from \$16.04 to \$21.62 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$27,236 or \$19.02 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 \$43,867. The subject property has an improvement assessment of \$35,282 or \$24.64 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 located in the same assessment neighborhood code as the subject. The comparables consist of one-story dwellings of frame exterior construction that were built from 1936 to 1948, with comparable #3 having a reported effective age of 1980. The homes range in size from 1,223 to 1,632 square feet of living area. Three comparables have partial basements and two dwellings have crawl-space foundations. Comparables #3 and #4 each have central air conditioning and three of the dwellings each have a fireplace. Four comparables have garages ranging in size from 328 to 624 square feet of building area. The comparables have improvement assessments ranging from \$33,626 to \$42,849 or from \$23.92 to \$28.52 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 parties submitted a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #3 and board of review comparables #2, #4 and #5 for their superior partial basement foundations as compared to the subject's crawl-space foundation.

The Board finds the best evidence of assessment equity to be appellant's comparables #1 and #2 along with board of review comparables #1 and #3, recognizing that while the foundation types are similar when compared to the subject, the homes differ in age/effective age as compared to the subject. These comparables have improvement assessments that range from \$21,773 to \$42,849 or from \$19.40 to \$28.52 per square foot of living area. The subject's improvement assessment of \$35,282 or \$24.64 per square foot of living area falls within the range established by the best comparables in this record and after considering adjustments 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 supported.

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:

April 19, 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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APPELLANT

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COUNTY

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