



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

APPELLANT: Jan Kielczewski  
DOCKET NO.: 19-07459.001-R-1  
PARCEL NO.: 15-18-401-009

The parties of record before the Property Tax Appeal Board are Jan Kielczewski, 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:** \$ 45,515  
**IMPR.:** \$138,879  
**TOTAL:** \$184,394

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 2,615 square feet of living area. The dwelling was constructed in 1987 and is approximately 32 years old. Features of the home include a partial basement with 1,770 square feet of finished area. Features include central air conditioning, two fireplaces and a 925 square foot garage. The property has an approximately 44,430 square foot site and is located in Long Grove, Vernon 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 four equity comparables located in the same assessment neighborhood code as the subject property. The comparables consist of one-story dwellings of wood siding or brick exterior construction that were 31 or 32 years old. The homes range in size from 2,559 to 5,113 square feet of living area.

Each dwelling has a full or partial basement, three of which have finished areas ranging in size from 2,284 to 2,511 square feet. Features include central air conditioning, one to five fireplaces and a garage ranging in size from 625 to 952 square feet of building area. The comparables have improvement assessments ranging from \$130,624 to \$220,484 or from \$43.12 to \$51.04 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$127,559 or \$48.78 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 \$184,394. The subject property has an improvement assessment of \$138,879 or \$53.11 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, where board of review comparables #1, #2 and #3 are the same properties as appellant's comparables #4, #3 and #1, respectively. The new comparable property identified as board of review comparable #4 is located in the same assessment neighborhood code as the subject property. The comparable is a one-story dwelling of wood siding exterior construction built in 1992. The home contains 3,094 square feet of living area and has a partial basement with 2,087 square feet of finished area, central air conditioning, four fireplaces and a 765 square foot garage. The comparable has an improvement assessment of \$163,577 or \$52.87 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 five equity comparables, three of which are common to both parties, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1, #2 and #3 along with board of review comparables #2 and #3 due to the substantially larger dwelling sizes of each of these three homes when compared to the subject.

The Board finds the best evidence of assessment equity to be appellant's comparable #4/board of review comparable #1 along with board of review comparable #4. These two comparables are the most similar to the subject in location, age, dwelling size and several features. The properties have improvement assessments of \$130,624 and \$163,577 or of \$51.04 and \$52.87 per square foot of living area. The subject's improvement assessment of \$138,879 or \$53.11 per square foot of living area is bracketed by the two best comparables in this record on an overall basis and falls

just above the two best comparables on a per-square-foot basis, which appears to be logical given the subject's larger garage size. Based on this record and after considering appropriate adjustments to the best 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:

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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