



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

APPELLANT: Thomas Reidy
DOCKET NO.: 19-07476.001-R-1
PARCEL NO.: 14-18-209-017

The parties of record before the Property Tax Appeal Board are Thomas Reidy, 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: \$14,752
IMPR.: \$45,449
TOTAL: \$60,201

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 wood siding exterior construction with 975 square feet of living area. The dwelling was constructed in 1955 and is 64 years old. Features of the home include a concrete slab foundation, central air conditioning and a 480 square foot garage. The property has a 13,268 square foot site and is located in Lake Zurich, Ela Township, Lake County.

The appellant contends assessment inequity, with respect to the improvement assessment, 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. The comparables are improved with one-story dwellings of wood siding exterior construction that range in size from 1,050 to 1,386 square feet of living area. The homes range in age from 65 to 68 years old. Two comparables have a concrete slab foundation, one comparable has a part

unfinished basement and part slab foundation, and one comparable has a crawl space foundation. Each comparable has central air conditioning and three comparables have a garage ranging in size from 288 to 440 square feet of building area. The comparables have improvement assessments that range from \$44,934 to \$60,069 or from \$42.79 to \$43.36 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$42,115 or \$43.19 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 \$60,201. The subject has an improvement assessment of \$45,449 or \$46.61 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 property. The comparables are improved with one-story dwellings of wood siding exterior construction that range in size from 1,050 to 1,102 square feet of living area. The homes were built from 1956 to 1987 with the oldest property having an effective year built of 1996. Four comparables have a finished lower level and one comparable has an unfinished basement. Three comparables have central air conditioning, three comparables each have one or two fireplaces and each comparable has a garage ranging in size from 220 to 600 square feet of building area. The comparables have improvement assessments that range from \$65,026 to \$77,181 or from \$60.04 to \$70.04 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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.

The parties submitted nine equity comparables for the Board's consideration. The Board gives less weight to the appellant comparables #1 and #2 along with each of the board of review comparables which differ from the subject in age/effective age, foundation type and/or lack of a garage.

The Board finds the best evidence of assessment equity to be the remaining two appellant comparables which are more like the subject in location, age, design and other features, but have substantially larger dwelling sizes when compared to the subject, suggesting a downward adjustment is necessary to make these properties more equivalent to the subject. These comparables have improvement assessments of \$60,069 and \$59,059 or for \$43.34 and \$43.36 per square foot of living area, respectively. The subject's improvement assessment of \$45,449 or \$46.61 per square foot of living area falls below the two best comparables in this record on an overall basis and above the two best comparables on a per square foot basis. Accepted real estate

theory provides that, all things being equal, as the size of a property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. Therefore, given the subject's smaller dwelling size, relative to the two best comparables, its higher per square foot value appears logical. After considering appropriate adjustments to the comparables for differences from 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:

May 17, 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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