



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

APPELLANT: Matthew Schoenfeld
DOCKET NO.: 19-07490.001-R-1
PARCEL NO.: 11-20-404-002

The parties of record before the Property Tax Appeal Board are Matthew Schoenfeld, 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: \$56,124
IMPR.: \$108,341
TOTAL: \$164,465

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 split-level dwelling of frame and brick exterior construction with 2,272 square feet of above grade living area.¹ The dwelling was constructed in 1973, is 46 years old and has an effective year built of 1998. Features of the home include a finished lower level, central air conditioning, a fireplace and a 516 square foot garage. The property has an approximately 10,177 square foot site and is located in Libertyville, Libertyville 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

¹ The Board finds the subject's dwelling is best described as a split-level design, based on the floorplan sketch and other details reported in the subject's property record card.

comparables are reported to be improved with one-story or two-story dwellings of wood siding exterior construction that range in size from 1,792 to 1,944 square feet of above grade living area. The homes range in age from 43 to 46 years old. Each comparable is reported to have an unfinished basement, central air conditioning and a garage ranging in size from 410 to 528 square feet of building area. Three comparables each have one fireplace. The comparables have improvement assessments that range from \$78,688 to \$87,145 or from \$43.46 to \$44.83 per square foot of above grade living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$100,365 or \$44.17 per square foot of above grade living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$164,465. The subject has an improvement assessment of \$108,341 or \$47.69 per square foot of above grade living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located in the same assessment neighborhood code as the subject property. The comparables are improved with split-level dwellings of frame and brick exterior construction with 1,383 or 1,423 square feet of above grade living area. The homes were built from 1973 to 1976 with one comparable having an effective year built of 1988. Each comparable has a finished lower level and two comparables also have an unfinished basement. The comparables have central air conditioning and a garage ranging in size from 440 to 561 square feet of building area. Three comparables each have one fireplace. The comparables have improvement assessments that range from \$62,301 to \$70,962 or from \$45.05 to \$50.50 per square foot of above grade 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 eight equity comparables for the Board's consideration. The Board finds the appellant's comparables are all smaller in dwelling size when compared to the subject and differ from the subject in design while each of the board of review comparables are substantially smaller in dwelling size when compared to the subject. The comparables have improvement assessments that range from \$62,301 to \$87,145 or from \$43.46 to \$50.50 per square foot of above grade living area. The subject's improvement assessment of \$108,341 or \$47.69 per square foot of above grade living area falls above the range established by the best comparables in this record on an overall basis and within the range on a per square foot basis. Given the subject's larger dwelling size, relative to the comparables in the record, an overall value above the range 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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