



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

APPELLANT: Calin Paunescu
DOCKET NO.: 19-08603.001-R-1
PARCEL NO.: 15-36-101-019

The parties of record before the Property Tax Appeal Board are Calin Paunescu, 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: \$103,325
IMPR.: \$82,372
TOTAL: \$185,697

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 2,365 square feet of living area. The dwelling was built in 1958 and is approximately 61 years old. The home has a reported effective date of construction of 1967. Features of the home include a crawl space foundation, central air conditioning, one fireplace, two bathrooms, and an attached garage with 440 square feet of building area. The property also has a 638 square foot barn that was built in 1977.¹ The property has a site with approximately 90,810 square feet or 2.0871 acres of land and is located in Riverwoods, Vernon 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

¹ Some of the descriptive data for the subject property was derived from a copy of the subject's property record card submitted by the board of review.

comparables improved with one-story dwellings of wood siding exterior construction ranging in size from 2,104 to 2,774 square feet of living area. The dwellings range in age from 59 to 73 years old. Each comparable has slab or crawl space foundation, one fireplace, and 1½ or 2 bathrooms. Three comparables have one fireplace and an attached garage ranging in size from 435 to 604 square feet of building area. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .22 to .105 miles from the subject property. The improvement assessments on these properties ranges from \$61,180 to \$79,051 or from \$26.55 to \$29.36 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$67,100.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$185,697. The subject property has an improvement assessment of \$83,372 or \$34.83 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted a uniformity grid analysis containing information on four equity comparables improved with one-story dwellings of wood siding or brick exterior construction ranging in size from 2,199 to 2,618 square feet of living area. The dwellings were built from 1958 to 1962 with the oldest home having an effective construction date of 1967. One comparable has a partial basement with finished area and three comparables have either a slab foundation or a crawl space foundation. Each comparable has central air conditioning, one or two fireplaces, two to three bathrooms, and an attached or detached garage ranging in size from 462 to 672 square feet of building area. Two comparables have either a pole-building or a metal utility shed. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .47 to 1.37 miles from the subject property. The improvement assessments on these properties range from \$77,140 to \$136,479 or from \$32.11 to \$52.13 per square foot of living area.

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 record contains eight comparables submitted by the parties to support their respective positions. The Board gives less weight to appellant's comparable #1 due to the lack of central air conditioning, no garage, and differences from the subject in dwelling size. The Board gives less weight to appellant's comparable #2 due to differences from the subject in dwelling size. The Board gives less weight to board of review comparable #4 due to its larger dwelling size in relation to the subject dwelling and the partial finished basement, which is superior to the subject's crawl space foundation. The remaining comparables, appellant's comparables #3 and #4 as well as board of review comparables #1 through #3, are relatively similar to the subject in size, age and features with the exception that only one comparable has a pole-building which is

somewhat similar to the subject's barn. The best comparables have improvement assessments ranging from \$61,180 to \$96,781 or from \$29.08 to \$42.63 per square foot of living area. The subject's improvement assessment of \$83,372 or \$34.83 per square foot of living area is within the range established by the best comparables in this record and well supported considering the adjustments to some of the comparables due to the subject property having a barn.

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: June 21, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Calin Paunescu, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld and Associates, LLC
33 North Dearborn Street
Suite 1850
Chicago, IL 60602

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085