



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

APPELLANT: Jack Schneiderman  
DOCKET NO.: 19-08606.001-R-1  
PARCEL NO.: 15-33-217-015

The parties of record before the Property Tax Appeal Board are Jack Schneiderman, 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 ***a reduction*** 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:** \$20,199  
**IMPR.:** \$117,958  
**TOTAL:** \$138,157

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 is improved with a two-story dwelling of wood siding exterior construction containing 2,459 square feet of living area. The dwelling was built in 1988 and is approximately 31 years old. Features of the home include an unfinished full basement, central air conditioning, 2½ bathrooms, and an attached garage with 440 square feet of building area. The property has a 9,330 square foot site and is located in Buffalo Grove, 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 comparables improved with two-story dwellings of wood siding exterior construction ranging in size from 2,444 to 2,707 square feet of living area. The dwellings range in age from 34 to 39 years old. Each property has an unfinished full basement, central air conditioning, 2½ bathrooms, and an attached garage with either 460 or 462 square feet of building area. Three

comparables have one or two fireplaces. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .16 to .45 of one mile from the subject property. The comparables have improvement assessments ranging from \$116,808 to \$127,913 or from \$47.25 to \$47.99 per square foot of living area, including land. The appellant requested the subject's improvement assessment be reduced to \$117,417.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$145,534. The subject property has an improvement assessment of \$125,335 or \$50.97 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 improved with two-story dwellings of wood siding exterior construction with either 2,470 or 2,583 square feet of living area. The dwellings were built in 1985 or 1986. Each comparable has a full or partial basement with four having recreation rooms ranging in size from 430 to 975 square feet. Each comparable has central air conditioning and an attached garage with either 440 or 460 square feet of building area. One comparable has a fireplace. The comparables have one to three full bathrooms and one or two half-bathrooms. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .16 to .47 of one mile from the subject property. The comparables have improvement assessments ranging from \$124,605 to \$131,525 or from \$50.45 to \$52.72 per square foot of living area, including land.

### **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 *met/did not meet* this burden of proof and a reduction in the subject's assessment *is/is not* warranted.

The parties submitted information on nine comparables similar to the subject in location, age and style. The Board gives less weight to appellant's comparable #1 due to differences from the subject in dwelling size. The Board gives less weight to board of review comparables #1, #3, #4 and #5 as each comparable has finished basement area, unlike the subject's unfinished basement. The Board finds the best evidence of assessment equity to be appellant's comparables #2 through #4 and board of review comparable #2 as each comparable has an unfinished basement like the subject dwelling. Appellant's comparables #2 and #4 would require downward adjustments as each has one fireplace whereas the subject has no fireplace. Board of review comparable #2 would require a downward adjustment as it has an additional bathroom in relation to the subject dwelling. These comparables have improvement assessments that range from \$116,808 to \$131,525 or from \$47.79 to \$50.92 per square foot of living area. The subject's improvement assessment of \$125,335 or \$50.97 per square foot of living area falls within the overall range but above the range on a per square foot of living area basis. Based on this record, after considering the necessary adjustments to the best comparables the Board finds the appellant demonstrated

with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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.

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Chairman



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Member



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Member



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Member



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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: July 19, 2022



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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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COUNTY

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