



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

APPELLANT: John Welu  
DOCKET NO.: 19-08749.001-R-1  
PARCEL NO.: 12-21-221-018

The parties of record before the Property Tax Appeal Board are John Welu, 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:** \$138,361  
**IMPR.:** \$147,069  
**TOTAL:** \$285,430

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 1.5-story dwelling of brick exterior construction with 2,025 square feet of living area. The dwelling was constructed in 1947 and is 73 years old. Features of the home include a basement that is finished with a recreation room,<sup>1</sup> central air conditioning, a fireplace and a 440 square foot garage. The property has a 13,640 square foot site and is located in Lake Bluff, Shields 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 with the same assessment neighborhood code as the subject. The comparables are described as 1.5-story dwellings of wood siding or brick exterior construction ranging in size

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<sup>1</sup> The board of review's evidence disclosed the subject has a basement that is finished with an 842 square foot recreation room which was unrefuted by the appellant.

from 1,662 to 2,117 square feet of living area. The dwellings are 80 to 100 years old. Each comparable has an unfinished basement, one or two fireplaces, and a garage or a carport ranging in size from 200 to 336 square feet of building area. Three comparables have central air conditioning. The comparables have improvement assessments ranging from \$94,988 to \$129,812 or from \$57.15 to \$61.38 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$285,430. The subject property has an improvement assessment of \$147,069 or \$72.63 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 with the same assessment neighborhood code as the subject. The comparables are described as 1.5-story or 2-story dwellings of wood siding, brick, or wood siding and stone exterior construction ranging in size from 1,908 to 2,205 square feet of living area. The dwellings were constructed from 1900 to 1948 with effective ages from 1926 to 1973. Four comparables have basements with two having a recreation room and one comparable has a lower level. Each comparable has central air conditioning and one or two fireplaces. Four comparables each have a garage ranging in size from 285 to 484 square feet of building area. The comparables have improvement assessments ranging from \$133,322 to \$157,660 or from \$65.23 to \$82.63 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 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 no reduction in the subject's assessment is warranted.

The parties submitted nine equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables and board of review comparables #1, #2 and #3 which have unfinished basements unlike the subject. The Board finds the best evidence of assessment equity to be board of review comparables #4 and #5 which have finished basement area and are relatively similar to the subject location, dwelling size, and other features. The two comparables have improvement assessments of \$144,959 and \$151,592 or \$65.74 and \$71.24 per square foot of living area. The subject has an improvement assessment of \$147,069 or \$72.63 per square foot of living area, which is bracketed by the best two comparables on an overall basis but is somewhat above on a square foot basis. However, after considering adjustments to the two 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: 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

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