



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

APPELLANT: Scott Levenfeld  
DOCKET NO.: 19-08818.001-R-1  
PARCEL NO.: 16-36-307-016

The parties of record before the Property Tax Appeal Board are Scott Levenfeld, 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:** \$76,299  
**IMPR.:** \$180,881  
**TOTAL:** \$257,180

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 two-story dwelling of brick and wood siding exterior construction with 3,570 square feet of living area. The dwelling was built in 1966 and is approximately 53 years old. The dwelling has an effective date of construction of 1971. Features of the home include a full basement finished with an 827 square foot recreation room, central air conditioning, one fireplace, 4½ bathrooms, and an attached garage with 550 square feet of building area. The property has a 15,110 square foot site and is located in Highland Park, Moraine 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 or brick exterior construction ranging in size from 2,710 to 4,068 square feet of living area. The dwellings range in age from

52 to 94 years old. Each comparable has a full basement with one having finished area, central air conditioning, two or three full bathrooms and one or two half-bathrooms. Three comparables have one or two fireplaces and three comparables have attached garages ranging in size from 506 to 627 square feet of building area. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .25 to .67 of one mile from the subject property. The improvement assessments on these properties range from \$115,156 to \$186,860 or from \$42.49 to \$46.51 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$158,954.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$257,180. The subject property has an improvement assessment of \$180,881 or \$50.67 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 three equity comparables improved with two-story dwellings of brick, dryvit, or brick and wood siding exterior construction ranging in size from 3,521 to 3,588 square feet of living area. The dwellings were built from 1931 to 1967 but have effective construction dates from 1965 to 1983. Each comparable has a full basement finished with a recreation room ranging in size from 905 to 1,339 square feet, central air conditioning, one to three fireplaces and an attached garage ranging in size from 484 to 714 square feet of building area. The comparables have either two or four full bathrooms and two comparables have an additional half-bathroom. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .16 to .54 of one mile from the subject property. The improvement assessments on these properties range from \$190,456 to \$200,543 or from \$53.08 to \$56.48 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 seven comparables submitted by the parties to support their respective positions. The Board gives less weight to the comparables submitted by the appellant due to differences from the subject property in dwelling age, size, finished basement area, number of bathrooms, number of fireplaces and/or lack of a garage. The Board finds the comparables provided by the board of review are improved with dwellings more similar to the subject dwelling in size, age and features than are the appellant's comparables; therefore, the Board gives more weight to the board of review comparables. The board of review comparables have improvement assessments that range from \$190,456 to \$200,543 or from \$53.08 to \$56.48 per square foot of living area. The subject's improvement assessment of \$180,881 or \$50.67 per square foot of living area is below the range established by the best comparables in this record.

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

Scott Levenfeld, 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