

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Carl Coulson
DOCKET NO.: 19-08838.001-R-1
PARCEL NO.: 07-30-210-055

The parties of record before the Property Tax Appeal Board are Carl Coulson, 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: \$6,626 **IMPR.:** \$23,935 **TOTAL:** \$30,561

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 one-story dwelling of wood siding exterior construction with 1,032 square feet of living area. The dwelling was constructed in 1922 and is approximately 97 years old. Features of the property include a crawl space foundation, one bathroom and a detached garage with 400 square feet of building area. The property has a 5,750 square foot site and is located in Grayslake, Warren 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 one-story style, dwellings of wood siding exterior construction ranging in size from 1,024 to 1,342 square feet of living area. The dwellings range in age from 89 to 96 years old. One comparable has a partial basement, three comparables have a crawl space foundation, each property has one bathroom, one comparable has a fireplace, and one

comparable has an attached garage with 242 square feet of building area. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .16 to .48 of one mile from the subject property. The improvement assessments on these properties range from \$16,428 to \$26,037 or from \$16.04 to \$19.10 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$18,782.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$30,561. The subject property has an improvement assessment of \$23,935 or \$23.19 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 one-story dwellings of wood siding exterior construction ranging in size from 1,074 to 1,164 square feet of living area. The dwellings were built from 1925 to 1933. Each comparable has a crawl space foundation, one bathroom and a detached garage with either 484 or 864 square feet of building area. One comparable has central air conditioning. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .09 to .49 of one mile from the subject property. The improvement assessments on these properties range from \$25,394 to \$29,940 or from \$23.22 to \$25.72 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 appellant's comparables due to differences from the subject dwelling in size and/or the lack of a garage. The Board gives most weight to board of review comparables as these properties are most similar to the subject dwelling in size and features than are the appellant's comparables. These three comparables have improvement assessments ranging from \$25,394 to \$29,940 or from \$23.22 to \$25.72 per square foot of living area. The subject's improvement assessment of \$23,935 or \$23.19 per square foot of living area is slightly 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.

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Member	Member
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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
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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 <u>PETITION AND EVIDENCE</u> 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

Carl Coulson, 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