



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

APPELLANT: Jay Baehr  
DOCKET NO.: 20-01140.001-R-1  
PARCEL NO.: 16-28-105-005

The parties of record before the Property Tax Appeal Board are Jay Baehr, 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:** \$58,875  
**IMPR.:** \$167,995  
**TOTAL:** \$226,870

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 2020 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 and wood siding exterior with 2,176 square feet of living area. The dwelling was constructed in 1961 and is approximately 59 years old. Features of the home include a part unfinished basement and part finished lower level, central air conditioning, one fireplace, and a 504 square foot attached garage.<sup>1</sup> The property has an approximate 12,035-square foot site and is located in Deerfield West Deerfield 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 property and located

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<sup>1</sup> The Board finds the best evidence to be the property record card and schematic diagram provided by the board of review.

within .56 of a mile from the subject. The properties are improved with one-story dwellings of brick or wood siding exterior construction that range in size from 1,656 to 2,297 square feet of living area. The dwellings range in age from 51 to 57 years old. Each comparable has a lower level with finished area, central air conditioning, and an attached garage that ranges in size from 484 to 528 square feet of building area. Three comparables each have one fireplace. The comparables have improvement assessments ranging from \$99,023 to \$138,325 or from \$54.03 to \$60.22 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$125,120 or \$57.50 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$226,870. The subject property has an improvement assessment of \$167,995 or \$77.20 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on three assessment equity comparables with the same assessment neighborhood code as the subject property and located within .71 of a mile from the subject. The comparables are improved with one-story dwellings of brick or brick and wood siding exterior construction that range in size from 2,013 to 2,066 square feet of living area. The dwellings were constructed in either 1960 or 1961. Each comparable has a lower level with finished area, central air-conditioning, and an attached garage that ranges in size from 546 to 1,105 square feet of building area. One comparable has one fireplace. The properties have improvement assessments ranging from \$147,368 to \$158,392 or from \$71.33 to \$78.41 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 taxpayer contends assessment inequity regarding the improvement 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 improvement assessment is not warranted.

The parties submitted a total of seven comparables for the Board's consideration. The Board gives less weight to the appellant's comparable #3 which has a significantly smaller dwelling size than the subject. The Board finds the best evidence of assessment equity to be the parties' remaining comparables which are similar to the subject in location, design, age, dwelling size, and most features. These comparables have improvement assessments ranging from \$54.03 to \$78.41 per square foot of living area. The subject's improvement assessment of \$77.20 falls within the range established by the best comparables in this record on a per square foot basis. Based on the evidence in this record, and after considering necessary adjustments to the best comparables for differences from the subject, the Board finds that the appellant has not demonstrated by clear and convincing evidence that the subject dwelling is inequitably assessed and, therefore, no reduction in the subject's improvement assessment is warranted.

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: September 20, 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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