



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

APPELLANT: Janet Rubel  
DOCKET NO.: 20-01352.001-R-1  
PARCEL NO.: 16-28-310-001

The parties of record before the Property Tax Appeal Board are Janet Rubel, 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:** \$51,588  
**IMPR.:** \$104,811  
**TOTAL:** \$156,399

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 is improved with a two-story dwelling of brick and wood siding exterior construction with 2,189 square feet of living area. The dwelling was built in 1965 and is approximately 55 years old. Features of the home include an unfinished full basement, central air conditioning, one fireplace and an attached garage with 440 square feet of building area. The property has a 10,123 square foot site and is located in Deerfield, West Deerfield Township, Lake County.

The appellant contends inequity with respect to the improvement assessment 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 that range in size from 1,998 to 2,662 square feet of living area. The homes range in age from 56 to 82 years old. Each comparable has a full or partial basement with two having finished area,

central air conditioning, and one fireplace. Three comparables have an attached garage ranging in size from 440 to 621 square feet of building area. The comparables are located from .06 to .35 of one mile from the subject property. The comparables have improvement assessments ranging from \$88,636 to \$106,177 or from \$39.89 to \$45.60 per square foot of living area. Based on this evidence the appellant requested the subject's improvement assessment be reduced to \$94,783.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$156,399. The subject property has an improvement assessment of \$104,811 or \$47.88 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, brick or brick and wood siding exterior construction that range in size from 1,952 to 2,297 square feet of living area. The homes were built from 1958 to 1965. Each comparable has a full or partial basement with four having finished area, central air conditioning, one fireplace and an attached garage ranging in size from 324 to 476 square feet of building area. The comparables are located from approximately .14 to .48 of one mile from the subject property. The comparables have improvement assessments ranging from \$114,231 to \$136,433 or from \$53.23 to \$64.23 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 parties submitted information on nine comparables to support their respect positions. The Board gives little weight to appellant's comparable #1 due to differences from the subject dwelling in age and size. The Board gives less weight to appellant's comparable #3 due to the fact this property lacks a garage while the subject has an attached garage with 440 square feet of building area. The Board finds the best evidence of assessment equity to be appellant's comparables #2 and #4 and the comparables submitted by the board of review. These comparables are relatively similar to the subject in location, size and features with the exception five of the comparables have partially finished basements while the subject has an unfinished basement, suggesting these comparables would require downward adjustments to make them more equivalent to the subject property. These comparables have improvement assessments that ranged from \$88,636 to \$136,433 or from \$43.34 to \$64.23 per square foot of living area. The subject's improvement assessment of \$104,811 or \$47.88 per square foot of living area falls within the range established by the best comparables in this record and well supported after considering the necessary adjustments. 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: September 20, 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

Janet Rubel, 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