



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

APPELLANT: Ivan Wolfson
DOCKET NO.: 20-01974.001-R-1
PARCEL NO.: 16-36-303-020

The parties of record before the Property Tax Appeal Board are Ivan Wolfson, 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: \$76,528
IMPR.: \$49,318
TOTAL: \$125,846

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 one-story dwelling of brick exterior construction with 1,368 square feet of living area. The dwelling was built in 1953 and is 67 years old. Features of the home include a full basement with finished area, central air conditioning, one fireplace, two full baths, and an attached one-car garage with 231 square feet of building area. The property has an approximately 8,910 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 one-story dwellings of wood siding or brick exterior construction ranging in size from 1,071 to 1,713 square feet of living area. The dwellings are 66 or 94 years old. Each property has a full basement with three having finished area, central air conditioning,

and one fireplace. Two comparables have two full baths. Two comparables have a full bath and a half bath. Three comparables have either an attached or detached garage ranging in size from 252 to 504 square feet of building area. The comparables have the same assessment neighborhood code as the subject property. These properties have improvement assessments ranging from \$22,112 to \$45,365 or from \$15.33 to \$30.55 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$31,840.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$125,846. The subject property has an improvement assessment of \$49,318 or \$36.05 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on three equity comparables improved with one-story dwellings of brick or brick and wood siding exterior construction ranging in size from 1,164 to 1,495 square feet of living area. The dwellings were built from 1951 to 1954 with comparable #1 having an effective year built of 1970. Three comparables have a full basement with one having finished area. One comparable has three full baths and two comparables have one full bath. Each dwelling has central air conditioning, one fireplace, and garage ranging in size from 264 to 325 square feet of building area. The comparables have the same assessment neighborhood code as the subject property. These properties have improvement assessments ranging from \$40,058 to \$58,291 or from \$32.89 to \$41.28 per square foot of living area. Based on this evidence, the board of review requests no change to 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 a reduction in the subject's assessment is not warranted.

The parties submitted seven comparables similar to the subject in location, and style. The Board finds the best evidence of assessment equity to be appellant's comparable #2 and board of review comparables #2 and #3 as these comparables are improved with homes most similar to the subject dwelling in age and size. The Board finds that two of these comparables have unfinished basements whereas the subject has finished basement area and one comparable does not have a garage whereas the subject has a garage, thus, upward adjustments are necessary to make them more equivalent to the subject property. These three comparables have improvement assessments that range from \$40,058 to \$49,176 or from \$30.55 to \$34.41 per square foot of living area. The subject's improvement assessment of \$49,318 or \$36.05 per square foot of living area falls above the range established by the best comparables in this record. Less weight is given the remaining comparables due to differences from the subject dwelling in size, age and/or being an outlier due to a considerably lower improvement assessment than the other comparables in the 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: November 22, 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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