



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

APPELLANT: Ronald Cole
DOCKET NO.: 20-01987.001-R-1
PARCEL NO.: 16-03-109-018

The parties of record before the Property Tax Appeal Board are Ronald Cole, 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: \$235,149
IMPR.: \$374,194
TOTAL: \$609,343

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 2-story dwelling of wood siding exterior construction with 6,282 square feet of living area. The dwelling was built in 1987 and is 33 years old. Features of the home include a full basement with finished area, central air conditioning, one fireplace and an 864 square foot garage. The property has a site containing approximately 47,350 square feet and is located in Lake Forest, 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 located within the same assessment neighborhood code as the subject property. The comparables are described as 1.5-story or 2-story dwellings of brick, stucco, or Dryvit exterior construction that range in size from 4,794 to 8,166 square feet of living area. The dwellings are 26 to 78 years old and have basements with three having finished area. Each comparable has

central air conditioning, one to four fireplaces, and a garage ranging in size from 746 to 1,690 square feet of building area. The comparables have improvement assessments that range from \$247,371 to \$362,531 or from \$32.98 to \$58.44 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$609,343. The subject property has an improvement assessment of \$374,194 or \$59.57 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 located within the same assessment neighborhood code as the subject property. The comparables are improved with 2-story dwellings of brick, wood siding, or stone and wood siding exterior construction that range in size from 5,452 to 6,250 square feet of living area. The dwellings were constructed from 1971 to 1999 with the oldest comparable having an effective year built of 1995. The comparables have basements, three of which are finished with a recreation room. Each comparable has central air conditioning and a garage ranging in size from 750 to 1,142 square feet of building area. Four comparables each have three fireplaces. Two comparables each have an inground swimming pool. The comparables have improvement assessments that range from \$270,389 to \$496,424 or from \$44.75 to \$89.60 per square foot of living area. The board of review noted the county comparables are more similar to the subject in gross living area and show practical uniformity. Based on this evidence, the board of review requested that the assessment be confirmed.

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 nine comparables for the Board's consideration. The Board gives less weight to the appellant's comparables due to significant differences in age or dwelling size when compared to the subject. The Board also gives less weight to board of review comparables #3 and #5 which have inground swimming pools unlike the subject. The Board finds the best evidence assessment equity to be board of review comparables #1, #2 and #4 which are more similar to the subject in dwelling size and age with varying degrees of similarity in features. These comparables have improvement assessments ranging from \$370,349 to \$496,424 or from \$67.93 to \$89.60 per square foot of living area. The subject's improvement assessment of \$374,194 or \$59.57 per square foot of living area falls within the range established by the best comparables in this record on an overall basis but below on a square foot basis. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, 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:

October 18, 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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