



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

APPELLANT: Courtney Hollowell  
DOCKET NO.: 20-02051.001-R-1  
PARCEL NO.: 16-24-308-006

The parties of record before the Property Tax Appeal Board are Courtney Hollowell, 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:** \$120,983  
**IMPR.:** \$182,435  
**TOTAL:** \$303,418

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 stucco exterior construction with 4,220 square feet of living area. The dwelling was built in 1923 and is approximately 97 years old. Features of the home include a basement that is partially finished, central air conditioning, two fireplaces, and an attached garage with 592 square feet of building area. The property has a site with approximately 22,360 square feet of land area and is located in Highland Park, Moraine 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 three equity comparables improved with 2-story or 2.5-story dwellings of brick or stucco exterior construction ranging in size from 4,039 to 4,909 square feet of living area. The homes range in age from 19 to 100 years old. The comparables have full basements with two having finished

area. Each comparable has central air conditioning, two or three fireplaces and an attached or detached garage ranging in size from 399 to 817 square feet of building area. The comparables are located from approximately .29 to .47 of one mile from the subject property. The comparables have improvement assessments ranging from \$158,654 to \$171,114 or from \$34.86 to \$39.28 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$159,206.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$303,418. The subject property has an improvement assessment of \$182,435 or \$43.23 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables improved with two-story dwellings of wood siding, brick or stone and wood siding exterior construction ranging in size from 3,832 to 4,663 square feet of living area. The homes were built from 1918 to 1940 with effective construction dates ranging from 1935 to 1975. Each of the comparables has a full basement with finished area and central air conditioning. The comparables have 2, 3 or 5 fireplaces. Three comparables have attached garages ranging in size from 400 to 550 square feet of building area. The comparables are located from approximately .16 to .78 of one mile from the subject property. The comparables have improvement assessments ranging from \$216,201 to \$281,300 or from \$52.05 to \$64.68 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 comparable sales submitted by the parties to support their respective positions. The Board gives little weight to appellant's comparable #1 due to differences from the subject dwelling in age. The Board gives little weight to appellant's comparable #2 due to differences from the subject in dwelling size. The Board gives most weight to appellant's comparable #3 and the board of review comparables. The Board finds the board of review comparables have similar actual ages as the subject dwelling but have younger effective ages than the subject dwelling suggesting these comparables would require downward adjustments for age. Conversely, board of review comparable #3 would require an upward adjustment as this property has no garage whereas the subject has an attached garage with 592 square feet of building area. These five comparables have improvement assessments that range from \$158,654 to \$281,300 or from \$39.28 to \$64.38 per square foot of living area. The subject's improvement assessment of \$182,435 or \$43.23 per square foot of living area falls within the range established by the best comparables in this record and well supported after considering the suggested 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

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COUNTY

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