



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

APPELLANT: Charles Westropp
DOCKET NO.: 20-02055.001-R-1
PARCEL NO.: 16-36-308-096

The parties of record before the Property Tax Appeal Board are Charles Westropp, 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: \$65,164
IMPR.: \$222,473
TOTAL: \$287,637

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 brick and vinyl siding exterior construction with 3,345 square feet of living area.¹ The dwelling was constructed in 2004 and is approximately 16 years old. Features of the home include a full basement with a 1,246-square foot recreation room, central air conditioning, a fireplace, and an attached garage with 441 square feet of building area. The property has a site measuring approximately 14,932 square feet of land area 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 located in the same assessment neighborhood code as is assigned to the subject property. The comparables consist of 2-story homes of brick or wood siding exterior

¹ Some descriptive information was drawn from the subject's property record card submitted by the board of review.

construction that range in size from 3,111 to 3,502 square feet of living area. The homes range in age from 13 to 26 years old. The comparables are described as each having a full basement, two with recreation rooms containing 1,215 and 1,254 square feet of finished area. Each comparable also features central air conditioning, one or two fireplaces, and an attached garage ranging in size from 399 to 682 square feet of building area. The comparables have improvement assessments that range from \$197,336 to \$221,237 or from \$63.17 to \$64.19 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$213,210 or \$63.74 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 \$287,637. The subject property has an improvement assessment of \$222,473 or \$66.51 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 in the same assessment neighborhood code as is assigned to the subject property. The comparables consist of 2-story and 3-story dwellings with brick, brick and stone, stone and stucco, or brick and vinyl siding exteriors that range in size from 3,130 to 3,810 square feet of living area. The homes were each built from 2003 to 2006. Each comparable features a full basement with a recreation room containing from 1,010 to 1,336 square feet of finished area. Each comparable also has central air conditioning, one or two fireplaces, and a garage ranging in size from 400 to 792 square feet of building area. The comparables have improvement assessments that range from \$212,708 to \$250,884 or from \$64.50 to \$67.99 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

Conclusion of Law

The taxpayer 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 a total of nine equity comparables in support of their positions before the Property Tax Appeal Board. The Board gave less weight to appellant's comparables #1 and #2 due to their lack of finished basement area, dissimilar to the subject's 1,246-square foot recreation room in the basement. The Board also gave reduced weight to board of review comparables #2 and #4 based on their significantly larger dwelling sizes relative to the subject. In addition, board of review comparable #4 is a 3-story dwelling, dissimilar to the subject's 2-story design.

The Board finds the best evidence of equity in assessment in this record to be appellant's comparables #3 and #4, along with board of review comparables #1, #3, and #5 which are most similar to the subject in location, design, age, dwelling size, finished basement, and most

features. These most similar comparables in the record have improvement assessments ranging from \$205,533 to \$246,111 or from \$64.17 to \$67.99 per square foot of living area. The subject's improvement assessment of \$222,473 or \$66.51 per square foot of living area falls well within the range established by the most similar comparables in this record both on an overall improvement assessment basis and on a per square foot of living area basis.

After considering adjustments to the best comparables in this record for differences from the subject, the Board finds that the appellant did not establish by clear and convincing evidence that the subject dwelling is inequitably assessed and, therefore, a reduction in the subject's improvement 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Charles Westropp, 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