



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

APPELLANT: Deborah Budnik
DOCKET NO.: 20-02278.001-R-1
PARCEL NO.: 16-15-103-010

The parties of record before the Property Tax Appeal Board are Deborah Budnik, 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: \$57,677
IMPR.: \$137,431
TOTAL: \$195,108

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 one-story dwelling of brick and wood siding exterior construction with 2,815 square feet of living area. The dwelling was constructed in 1956 and is approximately 64 years old. The dwelling has a reported effective age of 1975 due to remodeling in 2001. Features of the home include a basement with finished area, central air conditioning, one fireplace, and a 440 square foot garage. The property has an approximate 16,137 square feet 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 with the same assessment neighborhood code as the subject and located within .46 of a mile from the subject property. The comparables are improved with one-story dwellings of brick exterior construction ranging in size from 2,200 to 2,373 square feet of living area. The

dwellings are either 63 or 64 years old. The appellant reported that each comparable has a basement, two of which have finished area. Each comparable has central air conditioning and a garage ranging in size from 264 to 506 square feet of building area. Three comparables each have one fireplace. The comparables have improvement assessments that range from \$65,938 to \$95,541 or from \$29.98 to \$40.50 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$105,421 or \$37.45 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 \$195,108. The subject property has an improvement assessment of \$137,431 or \$48.82 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 with the same assessment neighborhood code as the subject and located within .28 of a mile from the subject property. The comparables are improved with one-story dwellings of brick, wood siding, wood siding and brick, or brick and stone exterior construction ranging in size from 2,183 to 2,831 square feet of living area. The dwellings were built from 1954 to 2009 and have reported effective ages ranging from 1957 to 2009. The board of review reported that three comparables each have a basement with finished area and one comparable has a crawl space foundation. Each comparable has central air conditioning, one or two fireplaces, and a garage ranging in size from 330 to 504 square feet of building area. The comparables have improvement assessments that range from \$108,013 to \$154,702 or from \$48.41 to \$54.65 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 record contains eight suggested equity comparables for the Board's consideration. However, the Board finds that board of review comparable #1 is the only comparable truly similar to the subject in location, design, age, dwelling size, and features. The other comparables in the record have significant differences from the subject in age/effective age, dwelling size, basement finish, foundation, and/or other features. Nevertheless, the comparables have improvement assessments ranging from \$65,938 to \$154,702 or from \$29.98 to \$54.65 per square foot of living area. The subject's improvement assessment of \$137,431 or \$48.82 per square foot of living area falls within the range established by the comparables in the record. Based on the evidence in 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 improvement assessment based on inequity is not warranted.

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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COUNTY

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