



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

APPELLANT: Ilya Brin  
DOCKET NO.: 20-02484.001-R-1  
PARCEL NO.: 15-33-110-023

The parties of record before the Property Tax Appeal Board are Ilya Brin, 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:** \$ 30,111  
**IMPR.:** \$113,186  
**TOTAL:** \$143,297

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 two-story dwelling<sup>1</sup> of frame exterior construction with 2,290 square feet of living area. The dwelling was constructed in 1985 and is approximately 35 years old. Features of the home include an unfinished full basement, central air conditioning, a fireplace and a 440 square foot garage. The property has a 7,918 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends assessment inequity concerning 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 assigned neighborhood code as the subject and within .35 of a mile from the subject. The comparables consist of two-story dwellings of wood siding exterior

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<sup>1</sup> Both parties describe the dwelling as a two-story home despite the subject's property record card schematic drawing depicting a part one-story and part two-story dwelling.

construction. The homes range in age from 34 to 41 years old and range in size from 2,377 to 2,490 square feet of living area. Each comparable has an unfinished full basement, central air conditioning and a garage ranging in size from 400 to 460 square feet of building area. Three of the comparables each have a fireplace. The comparables have improvement assessments ranging from \$101,700 to \$108,287 or from \$41.09 to \$44.13 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$98,069 or \$42.82 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 \$143,297. The subject property has an improvement assessment of \$113,186 or \$49.43 per square foot of living area.

In response to the appellant's evidence, the board of review argued that each of the appellant's comparables differ in dwelling size when compared to the subject; in contrast, the board of review presented four comparables identical in dwelling size to the subject.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located in the same assigned neighborhood code as the subject and within .23 of a mile from the subject. The comparables consist of two-story dwellings of frame exterior construction that were built in either 1985 or 1986. The homes each contain 2,290 square feet of living area and feature basements, three of which have finished area. Each comparable has central air conditioning and a 440 square foot garage. Three of the comparables each have a fireplace. The comparables have improvement assessments ranging from \$113,655 to \$116,684 or from \$49.63 to \$50.95 per square foot of living area. Based on this evidence and argument, 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 parties submitted a total of nine comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables which differ in dwelling size from the subject.

The Board finds the best evidence of assessment equity to be the board of review comparables which are similar to the subject in location, age and dwelling size but necessitate downward adjustments to three dwellings which have finished basement area. These four comparables have improvement assessments that range from \$113,655 to \$116,684 or from \$49.63 to \$50.95 per square foot of living area. The subject's improvement assessment of \$113,186 or \$49.43 per

square foot of living area falls below the range established by the best comparables in this record and appears to be well-supported by the best comparable, board of review #1, when considering differences in some amenities. Based on this record 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.

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Chairman



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Member



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Member



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Member



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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: July 19, 2022



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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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APPELLANT

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COUNTY

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