



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

APPELLANT: Steven Less  
DOCKET NO.: 20-02697.001-R-1  
PARCEL NO.: 15-07-212-004

The parties of record before the Property Tax Appeal Board are Steven Less, 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:** \$30,849  
**IMPR.:** \$108,035  
**TOTAL:** \$138,884

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 wood siding exterior construction containing 2,643 square feet of living area. The dwelling was built in 1991 and is approximately 29 years old. Features of the home include a full basement finished with a 699 square foot recreation room, central air conditioning, and an attached garage with 497 square feet of building area. The property has a site with approximately 12,020 square feet of land area and is located in Vernon Hills, Vernon 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 improved with two-story dwellings of wood siding exterior construction that range in size from 2,643 to 2,964 square feet of living area. The homes range in age from 27 to 31 years old. Each comparable has an unfinished full basement, central air conditioning and an

attached garage with either 420 or 497 square feet of building area. Three comparables have one fireplace. These properties have the same assessment neighborhood code as the subject and are located within .52 of one mile from the subject property. The comparables have improvement assessments ranging from \$96,965 to \$113,851 or from \$36.45 to \$38.46 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$99,971.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject property of \$138,884 with an improvement assessment of \$108,035 or \$40.88 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 improved with two-story dwellings with wood siding exterior construction containing 2,643 square feet of living area. The dwellings were built from 1989 to 1992. Each comparable has a full basement that is finished with a recreation room, central air conditioning and an attached garage with 497 square feet of building area. Four comparables each have one fireplace and two comparables have in-ground swimming pools. These properties have the same assessment neighborhood code as the subject and are located within approximately .55 of one mile of the subject property. These comparables have improvement assessments ranging from \$107,552 to \$116,867 or from \$40.69 to \$44.22 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 Board finds the best evidence of assessment equity to be appellant's comparable #2 and the comparables provided by the board of review as these properties are improved with dwellings similar to the subject in style, age and are identical in dwelling size. These comparables have similar features as the subject with the exception that appellant's comparable #2 has an unfinished basement and a fireplace while the subject has finished basement area and no fireplace. Four of the board of review comparables have one fireplace and two have in-ground swimming pools, features the subject does not have, suggesting these comparables would require downward adjustments to make them more equivalent to the subject dwelling. These comparables have improvement assessments that range from \$100,156 to \$116,867 or from \$37.89 to \$44.22 per square foot of living area. The subject's improvement assessment of \$108,035 or \$40.88 per square foot of living area falls within the range established by the best comparables in this record and is well supported after considering the suggested adjustments. The remaining comparables are given less weight due to differences from the subject in dwelling size and/or lack of finished basement area. 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:

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

Steven Less, 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