



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

APPELLANT: Edward Kriege
DOCKET NO.: 20-02869.001-R-1 through 20-02869.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Edward Kriege, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-02869.001-R-1	12-28-401-001	145,563	197,736	\$343,299
20-02869.002-R-1	12-28-109-029	7,912	0	\$7,912

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 two parcels improved with a 1.75-story dwelling of brick and wood siding exterior construction with 3,200 square feet of living area. The dwelling was constructed in 1938 and is approximately 82 years old. Features of the home include a basement, central air conditioning, three fireplaces, and a 451 square foot garage. The property has a combined 22,750 square foot site¹ and is located in Lake Forest, Shields Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales located from 0.46 to 0.94 of a mile

¹ The parties differ regarding the subject's lot size. The Board finds the best evidence of lot size is found in the subject's property record cards presented by the board of review, which were not refuted by the appellant in written rebuttal.

from the subject. The parcels range in size from 13,499 to 34,695 square feet of land area and are improved with 1.5-story or 2-story homes of brick or wood siding exterior construction ranging in size from 3,040 to 3,390 square feet of living area. The dwellings range in age from 81 to 120 years old. Each home has a basement, one of which has finished area, central air conditioning, one or three fireplaces, and a 462 or 475 square foot garage. The comparables sold from January 2019 to May 2020 for prices ranging from \$760,000 to \$1,070,000 or from \$250.00 to \$315.63 per square foot of living area, including land. Based on this evidence the appellant requested a reduction in the subject's assessment to \$318,347 which would reflect a market value of \$955,137 or \$298.48 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The board of review submitted two sets of its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$351,211. The subject's assessment reflects a market value of \$1,055,005 or \$329.69 per square foot of living area, land included, when using the 2020 three year average median level of assessment for Lake County of 33.29% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located from 0.04 of a mile to 1.40 miles from the subject. The parcels range in size from 13,050 to 34,140 square feet of land area and are improved with 1.5-story, 1.75-story, or 2-story homes of brick or wood siding exterior construction ranging in size from 2,921 to 3,559 square feet of living area. The dwellings were built from 1928 to 1948 with comparable #4 built in 1929 having an effective age of 1944. Three homes each have a basement, one of which has finished area, and one home has a concrete slab foundation. Three homes each have central air conditioning and each home has one or two fireplaces. The comparables have one or two garage ranging in size from 294 to 1,040 square feet of building area. Comparables #3 and #4 each have a fully finished attic. The comparables sold from December 2019 to September 2020 for prices ranging from \$1,065,000 to \$1,345,000 or from \$364.60 to \$426.98 per square foot of living area, including land. Based on this evidence the board of review requested the subject's assessment be confirmed.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). 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 a total of seven comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparable #1 and the board of review's comparables #1, #3, and #4, due to significant differences from the subject in age, foundation type, attic finish, number of garages, garage size, and/or proximity to the subject.

The Board finds the best evidence of market value to be the appellant's comparables #2 and #3 and the board of review's comparable #2, which are relatively similar to the subject in dwelling

size, age, location, and features, although only one of these comparables is similar to the subject in lot size. These most similar comparables sold from January 2019 to May 2020 for prices ranging from \$995,000 to \$1,070,000 or from \$307.48 to \$364.60 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,055,005 or \$329.69 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds 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:

December 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

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

APPELLANT

Edward Kriege, 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