

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Roula Jajeh

DOCKET NO.: 20-02963.001-R-1 PARCEL NO.: 12-30-302-003

The parties of record before the Property Tax Appeal Board are Roula Jajeh, 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: \$133,093 **IMPR.:** \$537,900 **TOTAL:** \$670,993

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 of brick exterior construction with 5,868 square feet of living area. The dwelling was constructed in 1997 and is approximately 23 years old. Features of the home include a basement, central air conditioning, three fireplaces, and a garage containing 1,122 square feet of building area. The property has an approximately 54,920 square foot site and is located in Lake Forest, Shields 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 neighborhood code as the subject property. The comparables consist of two-story dwellings of brick or shingle exterior construction that are 17 to 26 years old. The homes range in size from 5,024 to 6,336 square feet of living area. Each dwelling has central air conditioning, two to five fireplaces, a garage ranging in size from 832 to 989 square

feet of building area, and a basement with 1,480 to 2,705 square feet of finished area. The comparables have improvement assessments ranging from \$408,868 to \$554,471 or from \$81.38 to \$87.76 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$497,459 or \$84.77 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 \$670,993. The subject property has an improvement assessment of \$537,900 or \$91.67 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 that are located in the same assessment neighborhood code as the subject property. Comparables #2 and #3 are the same as appellant's comparables #4 and #2, respectively. The comparables consist of two-story dwellings of brick, brick and stone, brick and stucco, or stone and stucco exterior construction that were built from 1995 to 2005. The homes range in size from 6,318 to 6,892 square feet of living area. Each dwelling has central air conditioning, three to five fireplaces, and a garage ranging in size from 598 to 989 square feet of building area. Each comparable has a basement, with comparables #1 through #3 having from 1,480 to 3,083 square feet of finished area. Comparables #1, #2, and #4 feature finished attic space and comparables #1 and #3 feature inground swimming pools. The comparables have improvement assessments ranging from \$526,036 to \$648,260 or from \$79.39 to \$94.06 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 concerning the improvement 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 six equity comparables, two of which were common to the parties, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #2 and board of review comparables #1, #3, and #4, one of which is a common property, due to their larger dwelling size, inground swimming pool, and/or lack of finished basement when compared to the subject.

The Board finds the best evidence of assessment equity to be appellant's comparables #1, #3, and #4 and board of review comparable #2, one of which was a common property. The Board finds these comparables are more similar to the subject in dwelling size, age, and features. These comparables had improvement assessments that ranged from \$408,868 to \$554,471 or from \$81.38 to \$87.76 per square foot of living area. The subject's improvement assessment of \$537,900 falls within the range established by the best comparables in this record on an overall basis. While the subject's assessment per square foot of living area of \$91.67 falls slightly above the range established by the best comparables in the record, the Board finds this logical due to

the principle of economies of scale which generally provides that as the size of a property increases, the per unit value decreases, and in contrast, as the size of a property decreases, the per unit value increases. Based on this record and after considering adjustments to the best comparables for differences, 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.

22	- Fe-
	hairman
a R	Aster Soffen
Member	Member
Dan De Kinin	Sarah Bokley
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:	June 21, 2022
	111:10 16
	Man O
	Clark of the December Town Arrows I December

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 <u>PETITION AND EVIDENCE</u> 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

Roula Jajeh, 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