



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

APPELLANT: Courtney James
DOCKET NO.: 20-03088.001-R-1
PARCEL NO.: 14-13-401-010

The parties of record before the Property Tax Appeal Board are Courtney James, 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: \$79,539
IMPR.: \$147,936
TOTAL: \$227,475

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 1.5-story dwelling¹ of wood siding exterior construction with 3,516 square feet of living area.² The dwelling was constructed in 1980 and is approximately 39 years old. Features of the home include a walkout basement, central air conditioning, four fireplaces, a 988 square foot attached garage, and an 1,118 square foot inground swimming pool. The property has an approximately 175,930 square foot or 4.0389 acre site and is located in Long Grove, Ela Township, Lake County.

¹ Both the appellant and the board of review reported the subject to be a two-story home whereas the subject's property record card describes the subject as a one-story home; however, the property record card contains a sketch showing that the subject dwelling has living area on a partial second floor. Thus, the Board finds that the subject is a 1.5-story dwelling.

² The parties differ regarding the subject property's dwelling size. The Board finds the best evidence of dwelling size is found in the subject's property record card presented by the board of review, which was not refuted by the appellant in rebuttal.

The appellant contends assessment inequity with respect to the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables located within the same assessment neighborhood code as the subject property. The comparables are improved with 2-story homes of brick or wood siding exterior construction ranging in size from 3,036 to 4,047 square feet of living area. The dwellings range in age from 26 to 53 years old. Each home has a basement, one of which is a walkout basement, central air conditioning, one to five fireplaces, and an attached garage ranging in size from 648 to 821 square feet of building area. Comparable #3 also has a detached garage. The comparables have improvement assessments ranging from \$99,477 to \$152,578 or from \$32.77 to \$38.65 per square foot of living area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment to \$129,940 or \$36.96 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 \$227,475. The subject property has an improvement assessment of \$147,936 or \$41.18 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on fourteen equity comparables located within the same assessment neighborhood code as the subject property. The comparables are improved with 2-story homes of frame or brick with frame exterior construction ranging in size from 3,293 to 3,908 square feet of living area. The homes were built from 1973 to 2017 with comparable #1 having an effective age of 1985 and comparable #4 having an effective age of 1989. Each home has an unfinished basement, two of which are walkout basements and one of which is a lookout basement, central air conditioning, and one to three fireplaces. Thirteen comparables each have an attached garage ranging in size from 527 to 989 square feet of building area. Comparable #12 also has an 864 square foot detached garage. Seven comparables each have an inground swimming pool ranging in size from 216 to 760 square of building area. The comparables have improvement assessments ranging from \$147,049 to \$196,936 or from \$43.10 to \$52.42 per square foot of living area. Based on this evidence the board of review requested confirmation of the subject's improvement assessment.

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 record contains a total of 18 equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2 and #3 and the board of review's comparables #2, #6, #8, #9, #11, #12, and #14, due to significant differences from the subject in age, dwelling size, and/or garage amenities.

The Board finds the best evidence of assessment equity to be the appellant's comparable #4 and the board of review's comparables #1, #3, #4, #5, #7, #10, and #13, which are relatively similar to the subject in dwelling size, age, and some features, although only four of these comparables have an inground swimming pool like the subject. These most similar comparables have improvement assessments that range from \$121,606 to \$165,668 or from \$38.65 to \$50.89 per square foot of living area. The subject's improvement assessment of \$147,936 or \$41.18 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from 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.



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: June 21, 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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