



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

APPELLANT: Kent Shoellhorn
DOCKET NO.: 20-03095.001-R-1
PARCEL NO.: 11-15-405-003

The parties of record before the Property Tax Appeal Board are Kent Shoellhorn, 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: \$67,656
IMPR.: \$98,789
TOTAL: \$166,445

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-story dwelling of wood siding exterior construction containing 2,465 square feet of living area.¹ The dwelling was constructed in 1956 and is approximately 64 years old. The home has an effective built date of 1969 due to remodeling in 1969. Features of the home include an unfinished basement, central air conditioning, one fireplace, and an attached garage with 468 square feet of building area. The property has an approximately 43,124 square foot site is located in Libertyville, Libertyville 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 with the same neighborhood code as

¹ The Board finds the best description of the subjects' dwelling size is found in the property record card presented by the board of review which was not refuted by the appellant.

the subject property and located within 0.31 of a mile from the subject. The comparables are improved with 1-story dwellings of brick or wood siding exterior construction that range in size from 2,294 to 2,902 square feet of living area and are situated on sites that range in size from approximately 42,253 to 43,124 square feet of land area. The dwellings are from 61 to 67 years old. Each comparable has an unfinished basement, central air conditioning, one to three fireplaces, and a garage ranging in size from 480 to 539 square feet of building area. The properties sold from May 2018 to March 2020 for prices ranging from \$377,000 to \$565,000 or from \$164.34 to \$194.69 per square foot of living area, land included.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$146,281 reflecting a market value of \$438,887 or \$178.05 per square foot of living area, including land, when using the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's final assessment of \$166,445. The subject's assessment reflects an estimated market value of \$499,985 or \$202.83 square foot of living area, land included, when applying 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 the subject's assessment, the board of review submitted four comparable sales located within 0.72 of a mile from the subject with three having the same neighborhood code as the subject property. The comparables are improved with 1-story dwellings of wood siding or brick and wood siding exterior construction that range in size from 2,112 to 2,586 square feet of living area and are situated on sites that range in size from 31,360 to 82,760 square feet of land area. The dwellings were built from 1950 to 1967 with comparable #3 having an effective built date of 1974. The board of review reported that two comparables each have an unfinished basement, one comparable has an unfinished lower level, and one comparable has a concrete slab foundation. Each comparable has central air conditioning, one to three fireplaces, and an attached garage ranging in size from 497 to 660 square feet of building area. The comparables sold from March 2019 to April 2020 for prices ranging from \$465,000 to \$580,000 or from \$203.02 to \$256.52 per square foot of living area land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 parties submitted seven suggested comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #2 and #3 which have sales dates which occurred less proximate to the January 1, 2020 assessment date at issue, and less likely to reflect the subject's market value for the assessment date at issue. The Board gives less weight to the

board of review comparables #1, #3, and #4 which were reported to lack basements, a feature of the subject, or is located in a different assessment neighborhood than the subject.

The Board finds the best evidence of market value to be the appellant's comparable #1 and board of review comparable #2 which are more similar to the subject in location, design, age, dwelling size, and features. These two comparables sold in March and April 2020 for prices of \$475,000 and \$510,000 or \$189.09 and \$241.48 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$499,985 or \$202.83 per square foot of living area, land included, which is bracketed by the two best comparables in the record on both overall and per square foot bases. Based on this record and after considering adjustments to the two best comparables for differences, when compared to the subject, the Board finds a reduction in the subject's assessment is not warranted.

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: January 17, 2023



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

Kent Shoellhorn, 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