



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

APPELLANT: American National Bank & Trust of Chicago  
DOCKET NO.: 20-04016.001-R-1  
PARCEL NO.: 16-32-108-019

The parties of record before the Property Tax Appeal Board are American National Bank & Trust of Chicago, the appellant, by attorney Eric Feldman of Eric Feldman & Assoc. P.C. 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:** \$49,740  
**IMPR.:** \$71,426  
**TOTAL:** \$121,166

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 split-level<sup>1</sup> dwelling of brick and wood siding exterior construction with 1,462 square feet of above ground living area. The dwelling was constructed in 1956. Features of the home include a finished lower level and central air conditioning. The property has a 9,050 square foot site and is located in Deerfield, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales with the same assessment

---

<sup>1</sup> The subject's property record card presented by the board of review contained a schematic diagram and dimensions, which suggests the subject dwelling is a split-level design. Furthermore, the subject's neighborhood code is described as "Deerfield Pk Split Levels," suggesting the dwellings in the neighborhood are split-level designs.

neighborhood code as the subject and located within .10 of mile from the subject property. The comparables have sites that range in size from 8,930 to 10,120 square feet of land area. The comparables are described as one-story dwellings of brick and wood siding exterior construction ranging in size from 1,252 to 1,664 square feet of above ground living area. The dwellings were each built in 1956. The comparables each have a lower level, two of which have finished area. Each comparable has a central air conditioning, two comparables each have one or two fireplaces and three comparables each have a garage with either 264 or 506 square feet of building area. The comparables sold from April 2019 to August 2020 for prices ranging from \$301,000 to \$457,500 or from \$180.89 to \$276.44 per square foot of above ground living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$99,891, which would reflect a market value of \$299,703 or \$205.00 per square foot of above ground 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 total assessment for the subject of \$121,166. The subject's assessment reflects a market value of \$363,971 or \$248.95 per square foot of above ground 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 within .53 of a mile from the subject property, one of which has the same assessment neighborhood code as the subject.<sup>2</sup> Three comparables have sites that range in size from 7,750 to 12,000 square feet of land area. No site size was provided for board of review comparable #3. The comparables are described as one-story dwellings of wood siding exterior construction ranging in size from 1,172 to 1,345 square feet of above ground living area. The dwellings were built from 1952 to 1958. One comparable has a finished lower level and three comparables each have an unfinished basement. Three comparables have central air conditioning, one comparable has a fireplace and three comparables each have a garage ranging in size from 240 to 484 square feet of building area. The comparables sold from January 2019 to November 2020 for prices ranging from \$350,000 to \$410,000 or from \$262.76 to \$318.69 per square foot of above ground living area, including land. 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.

---

<sup>2</sup> The neighborhood codes for board of review comparables #2 through #4 are described as "Ranches in Brookside/Osterman or Ranches SW Deerfield," suggesting the dwellings in these two neighborhoods are ranch style homes.

The record contains eight suggested comparable sales for the Board's consideration. The Board has given less weight to the comparables presented by the board of review, which are less similar to the subject in dwelling size, style and/or location. Furthermore, board of review comparable #2 lacks central air conditioning, a feature of the subject.

The Board finds the best evidence of market value to be the appellant's comparables, which are overall more similar to the subject in location, dwelling size, design and age. However, the Board finds two comparables have unfinished lower levels, a feature of the subject, suggesting upward adjustments would be required to make these comparables more equivalent to the subject. The Board also finds three of the comparables each have a garage, not a feature of the subject, suggesting downward adjustments would be required. Nevertheless, the comparables sold from April 2019 to August 2020 for prices ranging from \$301,000 to \$457,500 or from \$180.89 to \$276.44 per square foot of above ground living area, including land. The subject's assessment reflects a market value of \$363,971 or \$248.95 per square foot of above ground living area, including land, which falls within the range established by the best comparable sales in the record that were presented by the appellant. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its assessment is 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

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: February 21, 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

American National Bank & Trust of Chicago, by attorney:  
Eric Feldman  
Eric Feldman & Assoc. P.C.  
123 W. Madison St.  
Suite 1704  
Chicago, IL 60602

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085