



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

APPELLANT: Sarah Agne  
DOCKET NO.: 20-04031.001-R-1  
PARCEL NO.: 16-20-403-046

The parties of record before the Property Tax Appeal Board are Sarah Agne, 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:** \$59,954  
**IMPR.:** \$123,126  
**TOTAL:** \$183,080

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 part one-story dwelling and part two-story<sup>1</sup> dwelling of brick exterior construction with 2,871 square feet of living area. The dwelling was constructed in 1967. Features of the home include a basement with finished area, central air conditioning, a fireplace and a 484 square foot garage. The property has a 12,450 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 five comparable sales with the same assessment neighborhood code as the subject and located within .25 of a mile from the subject property. The comparables have sites that range in size from 12,240 to 20,090 square feet of land area. The

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<sup>1</sup> The Board finds the best description of the subject's story height is found in the subject's property record card submitted by the board of review which contained a schematic diagram and dimensions of the subject dwelling.

comparables are improved with two-story dwellings of brick or brick and wood siding exterior construction ranging in size from 2,714 to 3,255 square feet of living area. The dwellings were built from 1966 to 1970. One comparable has a crawl space foundation and four comparables each have a basement. Each comparable has central air conditioning, a fireplace and a garage ranging in size from 440 to 552 square feet of building area. The comparables sold from May 2019 to June 2020 for prices ranging from \$465,000 to \$530,000 or from \$160.48 to \$190.20 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$160,123, which would reflect a market value of \$480,417 or \$167.33 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 total assessment for the subject of \$183,080. The subject's assessment reflects a market value of \$549,955 or \$191.56 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 five comparable sales located within .45 of a mile from the subject property, two of which have the same assessment neighborhood code as the subject. Comparables #2 and #3 have site sizes of 12,080 and 9,150 square feet of land area, respectively. No site sizes were provided for comparables #1, #4 and #5. The comparables are improved with two-story dwellings of brick, wood siding or brick and wood siding exterior construction ranging in size from 2,583 to 2,960 square feet of living area. The dwellings were built from 1956 to 1970 with comparable #3 having a reported effective age of 1978. The comparables each have basement, one of which has finished area. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 420 to 550 square feet of building area. The comparables sold from March 2019 to January 2021 for prices ranging from \$540,000 to \$737,500 or from \$193.34 to \$249.16 per square foot of 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.

The record contains ten suggested comparable sales for the Board's consideration. The board has given less weight to the appellant's comparable #1 due to its crawl space foundation, when compared to the subject's basement foundation and appellant's comparable #5 due to its larger dwelling size when compared to the subject. The Board has given reduced weight to board of review comparable #1 due to its sale date occurring less proximate in time to the assessment date at issue than the other comparable sales in the record, and thus is less likely to be indicative of the subject's market value as of January 1, 2020. The Board has also given reduced weight to

board of review comparables #2, #3 and #4 due to differences from the subject in age or dwelling size.

The Board finds the best evidence of market value to be parties' remaining comparable sales, which are similar to the subject in location, dwelling size, age and some features, except none of the comparables have a finished basement like the subject, suggesting upward adjustments would be required to make these comparables more equivalent to the subject. Nevertheless, the comparables sold from March 2019 to June 2020 for prices ranging from \$465,000 to \$540,000 or from \$160.48 to \$193.34 per square foot of living area, including land. The subject's assessment reflects a market value of \$549,955 or \$191.56 per square foot of living area, including land, which falls above the range established by the best comparable sales in the record in terms of overall market value but within the range on a price per square foot basis. The subject's higher overall market value appears to be justified given its finished basement area. Based on this record and after considering adjustments to the comparables for differences when compared to the subject, the Board finds no reduction in the subject's 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.

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Chairman



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Member



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Member



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Member



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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: March 21, 2023



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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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