



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

APPELLANT: John Briggs
DOCKET NO.: 21-00530.001-R-1
PARCEL NO.: 13-14-206-007

The parties of record before the Property Tax Appeal Board are John Briggs, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & 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: \$19,685
IMPR.: \$117,726
TOTAL: \$137,411

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 2021 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 dwelling of frame exterior construction with 2,371 square feet of living area. The dwelling was constructed in 1961 and has an effective age of 1977. Features of the home include a lower level with finished area, a fireplace, a 235 square foot enclosed porch, and a 911 square foot garage. The property has a 18,303 square foot site and is located in North Barrington, Cuba Township, Lake County.

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 five equity comparables with the same assessment neighborhood code as the subject property. The comparables are improved with 1.5-story or split-level homes of brick, frame, or brick frame exterior construction ranging in size from 1,534 to 2,934 square feet of living area. The dwellings were built from 1953 to 1964 with comparable #5 having an effective year built of 1957. Each home has a lower level with finished area and central air conditioning. Four comparables each have a fireplace. Four

comparables each have a garage ranging in size from 308 to 648 square feet of building area. Two homes have basements. The comparables have improvement assessments ranging from \$69,715 to \$119,974 or from \$37.39 to \$45.17 per square foot of living area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$137,411. The subject property has an improvement assessment of \$117,726 or \$49.65 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on five equity comparables with the same assessment neighborhood code as the subject property. The comparables are improved with split-level homes of brick or frame exterior construction ranging in size from 1,950 to 3,531 square feet of living area. The dwellings were built from 1951 to 1981 with comparable #4 having an effective year built of 1974. Two homes each have a walkout basement with finished area. Each home has a lower level with finished area and central air conditioning. Four comparables each have one to four fireplaces. Two comparables each have a garage with 672 or 676 square feet of building area. The comparables have improvement assessments ranging from \$76,310 to \$169,725 or from \$45.45 to \$58.07 per square foot of living area. The board of review through the township assessor also noted the subject property had an addition and remodel completed in 2016 and 2017. Before and after exterior photographs of the subject property were submitted that shows the addition. Based on this evidence the board of review requested confirmation of the subject's improvement assessment.

Conclusion of Law

The taxpayer 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 ten equity comparables for the Board's consideration. The Board gives less weight to appellant's comparables #1, #2 and #5 as well as board of review comparables #4 and #5 due to differences in dwelling size when compared to the subject.

The Board finds the best evidence of assessment equity to be appellant's comparables #3 and #4 along with board of review comparables #1, #2 and #3 which are more similar in dwelling size with varying degrees of similarity in location, year built, effective year built and features. These comparables have improvement assessments ranging from \$75,566 to \$131,355 or from \$37.39 to \$58.07 per square foot of living area. The subject's improvement assessment of \$117,726 or \$49.65 per square foot of living area falls within the range established by the best comparables in this record. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's assessment is supported. Based on this record 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:

August 22, 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

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