



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

APPELLANT: Eric Egan
DOCKET NO.: 21-00598.001-R-1
PARCEL NO.: 12-34-102-002

The parties of record before the Property Tax Appeal Board are Eric Egan, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC in Chicago; and the Lake County Board of Review.¹

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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: \$198,894
IMPR.: \$82,100
TOTAL: \$280,994

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 is improved with a one-story dwelling of wood siding exterior construction containing 2,414 square feet of living area. The dwelling was built in 1957 and is approximately 64 years old. Features of the home include an unfinished 483 square foot partial basement, central air conditioning, two fireplaces and garage with 400 square feet of building area. The property has an approximately 28,900 square foot site located in Lake Forest, Shields 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 four equity comparables located in the same assessment neighborhood code as the subject property.

¹ The parties agreed to forego the scheduled virtual hearing on this case and have the Board issue a decision based on the evidence in the record.

The comparables are improved with one-story dwellings of brick or wood siding exterior construction that range in size from 2,064 to 3,373 square feet of living area. The homes range in age from 62 to 71 years old. Each comparable has a partial basement ranging in size from 712 to 2,010 square feet of area with two having finished area. The dwellings each have one to four fireplaces and a garage ranging in size from 504 to 650 square feet of building area. Three comparables have central air conditioning. The comparables have improvement assessments that range from \$43,917 to \$93,510 or from \$14.20 to \$28.17 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$57,996 or \$24.02 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 \$289,419. The subject has an improvement assessment of \$90,525 or \$37.50 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 located in the same assessment neighborhood code as the subject property. The comparables are improved with one-story dwellings of brick or wood siding exterior construction that range in size from 2,147 to 2,696 square feet of living area. The homes were built from 1953 to 1964. Each comparable has a full or partial basement ranging in size from 1,471 to 1,653 square feet of area with two having finished area. The homes each have one or two fireplaces and a garage ranging in size from 273 to 696 square feet of building area. Three dwellings have central air conditioning. The comparables have improvement assessments that range from \$82,011 to \$137,026 or from \$31.18 to \$55.39 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted nine equity comparables for the Board's consideration. The Board gives less weight to appellant comparables #1, #2 and #3 and board of review comparables #1 and #5 which differ from the subject in dwelling size and/or have finished basements in contrast to the subject's unfinished basement.

The Board finds the best evidence of assessment equity to be appellant comparable #4 and board of review comparables #2, #3 and #4 which are more similar to the subject in location, age, design, dwelling size and other features, although each of these properties has a larger basement size relative to the subject. These best comparables have improvement assessments that range from \$80,247 to \$101,190 or from \$28.17 to \$43.92 per square foot of living area. Appellant comparable #4 is most similar to the subject in basement size and has an improvement assessment of \$80,247 or \$28.17 per square foot. The subject's improvement assessment of

\$90,525 or \$37.50 per square foot of living area falls within the range established by the best comparables in this record. However, after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is 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:

December 20, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Eric Egan, 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