



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

APPELLANT: Michael Cordaro
DOCKET NO.: 21-01738.001-R-1
PARCEL NO.: 12-28-110-047

The parties of record before the Property Tax Appeal Board are Michael Cordaro, 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 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: \$94,861
IMPR.: \$126,429
TOTAL: \$221,290

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 2-story dwelling of wood siding exterior construction with 2,516 square feet of living area. The dwelling was constructed in 1920 and is approximately 101 years old. Features of the home include an unfinished basement, two fireplaces and a garage with 360 square feet of building area. The property has an approximately 11,130 square foot site and is located in Lake Forest, Shields Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four suggested equity comparables that are in the same assessment neighborhood code as the subject and located from .28 of a mile to 1.5 miles from the subject property. The comparables are reported to be improved with 1.5-story, 1.75-story or 2-story dwellings of either brick or wood siding exterior construction ranging in size from 2,173 to 2,761 square feet of living area. The dwellings range in age from 87 to 106 years old. Each comparable has a basement, one with finished area and a garage ranging in size from 288 to 448 square feet of building area. One comparable has central air conditioning and two comparables each have a fireplace. The comparables have improvement assessment ranging from

\$100,414 to \$130,550 or from \$46.20 to \$49.94 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$120,264 or \$47.80 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 \$227,932. The subject property has an improvement assessment of \$133,071 or \$52.89 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on five suggested equity comparables that are in the same assessment neighborhood code as the subject and located from .46 of a mile to 1.53 miles from the subject property. The comparables are improved with 2-story dwellings of brick, wood siding, stone and stucco or brick and wood siding exterior construction ranging in size from 2,427 to 2,861 square feet of living area. The dwellings were built from 1908 to 1927 with comparables #1, #2, #3 and #4 having effective ages ranging from 1933 to 1945. Each comparable has a basement, four with finished area, one or five fireplaces and a garage ranging in size from 400 to 672 square feet of building area. Four comparables each have central air conditioning and three comparables each have a fully finished attic. The comparables have improvement assessments ranging from \$168,651 to \$248,978 or from \$61.53 to \$93.74 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's 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 based upon the evidence in the record a reduction in the subject's assessment is warranted.

The parties submitted nine suggested comparables for the Board's consideration. The Board has given less weight to appellant's comparables #1 and #3 as well as the board of review comparables, which differ from the subject in central air conditioning, basement finish and/or fully finished attic.

The Board finds the best evidence of assessment to be appellant's comparables #2 and #4, which are relatively similar to the subject in location, design, dwelling size, age and some features. These two most similar comparables have improvement assessments of \$127,107 and \$130,550 or \$47.28 and \$49.94 per square foot of living area. The subject property has an improvement assessment of \$133,071 or \$52.89 per square foot of living area, which is greater than the best comparables in the record. Based on this record, the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the 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: January 16, 2024



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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