



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

APPELLANT: Gerald Sak
DOCKET NO.: 21-02121.001-R-1
PARCEL NO.: 16-27-119-013

The parties of record before the Property Tax Appeal Board are Gerald Sak, 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: \$57,774
IMPR.: \$77,320
TOTAL: \$135,094

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 1-story dwelling of brick and wood siding exterior construction with 1,433 square feet of living area. The dwelling was built in 1970 and is approximately 51 years old. Features of the home include a finished lower level, central air conditioning, and a garage with 572 square feet of building area. The property has an approximately 10,262 square foot site and is located in Highland Park, Moraine 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 equity comparables located within the same assessment neighborhood code as the subject property. The properties are improved with 1-story dwellings of brick exterior construction ranging in size from 1,433 to 1,534 square feet of living area. The dwellings range in age from 62 to 67 years

old. Each comparable has a lower level with finished area and central air conditioning. One comparable has one fireplace. Three comparables each have a garage that ranges in size from 264 to 528 square feet of building area. These properties have improvement assessments ranging from \$63,975 to \$68,220 or from \$42.40 to \$47.61 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$63,338 or \$44.20 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 \$135,094. The subject property has an improvement assessment of \$77,320 or \$53.96 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on six equity comparables located within the same assessment neighborhood code as the subject property. The properties are improved with 1-story dwellings of brick, wood siding, or brick and wood siding exterior construction ranging in size from 1,212 to 1,568 square feet of living area. The dwellings were built from 1953 to 1977 and thus would range in age from approximately 44 to 68 years old. Comparables #5 and #6 have effective years built of 1975 and 1971, respectively. The comparables each have a finished lower level with comparable #2 also having a partial basement. Each dwelling has central air conditioning and a garage that ranges in size from 462 to 682 square feet of building area. Five comparables each have one fireplace. These properties have improvement assessments ranging from \$70,099 to \$88,317 or from \$53.59 to \$60.05 per square foot of living area. Based on this evidence, the board of review requests no change to the subject's assessment.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted nine equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables as well as board of review comparables #5 and #6 which are less similar to the subject in age than other comparables in this record. The Board also gives less weight to board of review comparable #2 which has basement area, unlike the subject.

The Board finds the best evidence of assessment equity to be board of review comparables #1, #3, and #4 which are overall more similar to the subject in location, age, dwelling size, and other features. These comparables have improvement assessments ranging from \$70,099 and \$80,007 or from \$53.59 to \$60.05 per square foot of living area. The subject's improvement assessment of \$77,320 or \$53.96 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not

prove by 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:

November 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

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