



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

APPELLANT: Paul Goldberg  
DOCKET NO.: 21-02189.001-R-1  
PARCEL NO.: 16-31-106-008

The parties of record before the Property Tax Appeal Board are Paul Goldberg, the appellant, by attorney Andrew J. Rukavina, of The Tax Appeal Company in Mundelein; 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:** \$78,287  
**IMPR.:** \$121,612  
**TOTAL:** \$199,899

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 two-story dwelling of brick and wood siding exterior construction with 3,006 square feet of living area. The dwelling was constructed in 1996. Features of the home include an unfinished basement, central air conditioning, a fireplace, and a garage containing 589 square feet of building area. The property is located in Riverwoods, 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 located within .18 of a mile of the subject and within the subject's assessment neighborhood. The comparables consist of two-story dwellings of wood siding exterior construction ranging in size from 2,654 to 3,245 square feet of living area. The homes were built in 1995 or 1996. Each dwelling has central air conditioning, a basement with two having finished area, and a garage ranging in size from 600 to 660 square feet

of building area. Three comparables each have a fireplace. The comparables sold from February 2019 to April 2021 for prices ranging from \$475,000 to \$638,000 or from \$175.40 to \$212.89 per square foot of living area, including land. Based on this evidence, the appellant requested a reduced assessment of \$182,396, for an estimated market value of \$547,243 or \$182.05 per square foot of living area, including land, when applying 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 \$199,899. The subject's assessment reflects a market value of \$601,200 or \$200.00 per square foot of living area, land included, when using the 2021 three-year average median level of assessment for Lake County of 33.25% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted an appraisal of the subject property and information on three additional comparable sales. The appraisal estimated the subject property had a market value of \$600,000 as of March 28, 2019. The appraisal was prepared by Donald Arceri, a Certified Residential Real Estate Appraiser. The purpose of the appraisal was to determine the market value of the subject property for a refinance transaction.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach by examining five comparable sales and one listing within 1.24 miles of the subject. The comparables are improved with two-story dwellings ranging in size from 2,653 to 2,922 square feet of living area. The dwellings are 14 to 24 years old. Each comparable has central air conditioning, a basement with finished area, and a two-car or three-car garage. The sales occurred from June 2018 to February 2019 for prices ranging from \$565,000 to \$640,000 or from \$201.92 to \$235.21 per square foot of living area, including land. Adjustments were applied for differences between the comparables and the subject property for dwelling size, condition, bathroom count, and other features to arrive at adjusted prices ranging from \$596,780 to \$658,975. Based on this data, the appraiser arrived at a market value of \$600,000 or \$199.60 per square foot of living area, including land, as of March 28, 2019.

The board of review also submitted three additional comparable sales located within .47 of a mile of the subject and within the subject's assessment neighborhood. The comparables consist of two-story or part one-story and part two-story<sup>1</sup> dwellings of wood siding exterior construction ranging in size from 2,654 to 2,819 square feet of living area. The dwellings were built in 1994 or 1995. Each dwelling has central air conditioning, an unfinished basement, and a garage ranging in size from 500 to 660 square feet of building area. Comparable #1 has a fireplace. The comparables sold from June to August 2021 for prices ranging from \$573,000 to \$750,000 or from \$203.26 to \$282.59 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**

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<sup>1</sup> Although the board of review describes comparable #3 has a one-story dwelling, the grid reports a 2,192 square foot ground floor and 2,819 square feet of above ground living area, indicating that this is a part two-story dwelling.

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 parties submitted a total of eight comparable sales and an appraisal to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to the appellant's comparables #2 through #4 due to their less proximate sale dates for valuation as of January 1, 2021. The Board gives little weight to the appraisal submitted by the board of review as it has an effective date of March 2019 and relies on comparable sales occurring in 2018 and 2019, making it a less reliable indicator of value as of the January 1, 2021 lien date at issue.

The Board finds the best evidence of market value to be appellant's comparable sales #1 and #5 along with the board of review comparable sales, which are similar to the subject in age, location, dwelling size, and features. These most similar comparables sold from February 2020 to August 2021 for prices ranging from \$475,000 to \$750,000 or from \$175.40 to \$282.59 per square foot of living area, including land. Excluding the high and low sales from the analysis results in a tighter range of sale prices from \$493,000 to \$649,000 or from \$182.05 to \$239.66 per square foot of living area, including land. The subject's assessment reflects a market value of \$601,200 or \$200.00 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds 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:

July 18, 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

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

APPELLANT

Paul Goldberg, by attorney:  
Andrew J. Rukavina  
The Tax Appeal Company  
28643 North Sky Crest Drive  
Mundelein, IL 60060

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085