



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

APPELLANT: Michelle You
DOCKET NO.: 21-02461.001-R-1
PARCEL NO.: 13-24-204-008

The parties of record before the Property Tax Appeal Board are Michelle You, 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: \$39,500
IMPR.: \$163,674
TOTAL: \$203,174

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 1.5-story dwelling of wood siding and brick exterior construction with 3,693 square feet of living area.¹ The dwelling was constructed in 1976 and is approximately 45 years old. Features of the home include a basement with finished area, central air conditioning, two fireplaces, a 672 square foot attached garage, and an inground swimming pool. The property has a 53,072 square foot site and is located in Barrington, Cuba Township, Lake County.

The appellant contends assessment inequity concerning the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables located within the same assessment neighborhood code as the subject. The

¹ The parties differ regarding the subject's dwelling size. The Board finds the best evidence of dwelling size is found in the subject's property record card which contains a sketch with measurements of the subject home.

comparables are improved with 1.5-story homes of frame or frame and brick exterior construction ranging in size from 3,173 to 4,042 square feet of living area. The dwellings are 50 or 55 years old. Each home has a basement, one of which has finished area, central air conditioning, two fireplaces, and an attached garage ranging in size from 706 to 816 square feet of building area. Comparable #3 also has a 657 square foot detached garage. The comparables have improvement assessments ranging from \$129,445 to \$178,613 or from \$43.75 to \$59.06 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 \$203,174. The subject property has an improvement assessment of \$163,674 or \$44.32 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables located within the same assessment neighborhood code as the subject. The comparables are improved with 1.5-story, 2-story, or part 1-story part 2-story homes² of wood siding or brick and wood siding exterior construction. The homes range in size from 2,850 to 3,478 square feet of living area and were built from 1970 to 1983 with the oldest home having an effective age of 1977. Each home has a basement with finished area, central air conditioning, two or three fireplaces, and a garage ranging in size from 576 to 768 square feet of building area. Comparable #1 has a greenhouse. The comparables have improvement assessments ranging from \$142,371 to \$182,449 or from \$49.10 to \$52.46 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 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 record contains a total of six comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #2 and #3 and the board of review's comparable #3, due to substantial differences from the subject in dwelling size and/or basement finish.

The Board finds the best evidence of assessment equity to be the appellant's comparable #1 and the board of review's comparables #1 and #2, which are more similar to the subject in dwelling size, age, location, and features, although none of these comparables have an inground swimming pool like the subject, suggesting upward adjustments to these comparables would be

² The board of review reported comparable #2 is a 1-story home but also reported above ground living area that is greater than the reported ground floor living area, suggesting this home has second floor living area.

needed to make them more equivalent to the subject. These comparables have improvement assessments that range from \$162,629 to \$182,449 or from \$44.19 to \$52.46 per square foot of living area. The subject's improvement assessment of \$163,674 or \$44.32 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 appropriate adjustments to the best comparables for differences from the subject, 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: October 17, 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

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