



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

APPELLANT: Angelo Valenti  
DOCKET NO.: 21-03213.001-R-1  
PARCEL NO.: 16-16-103-002

The parties of record before the Property Tax Appeal Board are Angelo Valenti, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC in Chicago, and the Lake County Board of Review.<sup>1</sup>

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:** \$61,927  
**IMPR.:** \$122,031  
**TOTAL:** \$183,958

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 wood siding exterior construction with 2,472 square feet of living area. The dwelling was built in 1977 and is approximately 44 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace, a 462 square foot attached garage and a 960 square foot detached garage. The property has a 27,817 square foot site and is located in Highland Park, West Deerfield 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 with the same assessment neighborhood code as the subject. The comparables are

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<sup>1</sup> The parties agreed to forgo the scheduled virtual hearing on this case and have the Board issue a decision based on the evidence in the record.

improved with two-story dwellings of wood siding or brick exterior construction that range in size from 2,460 to 2,865 square feet of living area and are either 43 or 44 years old. The comparables are reported to have basements with one having finished area. Each comparable has central air conditioning and an attached garage ranging in size from 440 to 529 square feet of building area. Three comparables each have one or two fireplaces. The comparables have improvement assessments ranging from \$72,271 to \$126,633 or from \$29.38 to \$46.69 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 \$183,958. The subject property has an improvement assessment of \$122,031 or \$49.37 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables with the same assessment neighborhood code as the subject. The comparables are described as one-story<sup>2</sup> or two-story dwellings of brick and wood siding exterior construction that range in size from 2,260 to 2,816 square feet of living area. The comparables were built from 1977 to 1984. Two comparables are reported to have a concrete slab foundation and two comparables have basements with one having finished area. Each comparable has central air conditioning, one fireplace and a garage ranging in size from 440 to 506 square feet of building area. The comparables have improvement assessments ranging from \$115,886 to \$142,926 or from \$49.80 to \$51.28 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 parties submitted eight equity comparables for the Board's consideration which have varying degrees of similarity to the subject in age, dwelling size, and features. Nevertheless, the Board gives less weight to appellant's comparable #1 which has a considerably lower improvement assessment than the other comparables in the record and thus appears to be an outlier. The Board gives less weight to appellant's comparable #2 and board of review comparable #1 due to their larger dwelling sizes when compared to the subject. The Board gives most weight to appellant's comparables #3 and #4 as well as board of review comparables #2, #3 and #4 which are most similar to the subject in dwelling size. However, each comparable lacks an additional detached garage and two comparables have finished basement area when compared to the subject. Nevertheless, these comparables have improvement assessments ranging from \$115,886 to

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<sup>2</sup> The Board finds comparable #4 has ground floor area of 700 square feet with above ground area of 2,260 square feet, suggesting this is a part two-story dwelling.

\$127,718 or from \$43.88 to \$51.28 per square foot of living area. The subject's improvement assessment of \$122,031 or \$49.37 per square foot of living area falls within the range established by the comparables in this record. Based on the evidence in this record, 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 improvement assessment based on inequity is not warranted.

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

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 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

AGENCY

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