



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

APPELLANT: Stacey Rosen
DOCKET NO.: 21-03271.001-R-1
PARCEL NO.: 16-36-302-059

The parties of record before the Property Tax Appeal Board are Stacey Rosen, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$70,309
IMPR.: \$134,671
TOTAL: \$204,980

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 split-level dwelling of brick exterior construction with 2,845 square feet of above grade living area. The dwelling was constructed in 1962 and is approximately 59 years old. Features of the home include a basement with finished area, central air conditioning, a fireplace, a 460 square foot garage, and an 800 square foot inground swimming pool. The property has an approximately 12,350 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant contends assessment inequity, with respect to the improvement assessment, as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located within .25 of a mile from the subject and have the same assessment neighborhood code as the subject. The comparables are described as split-level dwellings of brick exterior construction that range in size from 2,783 to 3,450 square feet of above grade

living area. The homes range in age from 56 to 60 years old. One comparable has concrete slab foundation, and three comparables have basements with one comparable having finished area. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 500 to 624 square feet of building area. The comparables have improvement assessments that range from \$120,327 to \$142,185 or from \$40.21 to \$43.24 per square foot of above grade living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$118,668 or \$41.71 per square foot of above grade living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$204,980. The subject has an improvement assessment of \$134,671 or \$47.34 per square foot of above grade living area.

In support of its contention of the correct assessment, the board of review submitted information on five equity comparables located within .28 of a mile from the subject and have the same assessment neighborhood code as the subject. Comparable #3 is the same property as the appellant's comparable #1. The comparables are described as split-level dwellings of brick, brick and wood siding, or vinyl siding and brick exterior construction that range in size from 2,729 to 3,150 square feet of above grade living area. The homes were built from 1961 to 1965, and comparables #1, #4 and #5 have effective ages of 1970, 1980, 1982, respectively. One comparable has crawl space foundation. Four comparables have a basement with finished area. Each comparable has central air conditioning, one fireplace and a garage ranging in size from 484 to 552 square feet of building area. The comparables have improvement assessments that range from \$126,255 to \$141,861 or from \$40.21 to \$48.22 per square foot of above grade living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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, as one comparable is common to the parties. All the parties' comparables lack an inground swimming pool, which is a feature of the subject. The Board gives less weight to the appellant's comparable #1/board of review comparable #3 and appellant comparables #2 and #3 which differ from the subject in in dwelling size, foundation type, and/or lack a basement finish.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables. These comparables are relatively similar to the subject in location, age, dwelling size, finished basement area, and some features. These five comparables have improvement assessments that range from \$120,327 to \$141,861 or from \$43.24 to \$48.22 per square foot of above grade living

area. The subject's improvement assessment of \$134,671 or \$47.34 per square foot of above grade living area falls within the range established by the best comparables in this record. After considering appropriate adjustments to the comparables for differences from the subject, including but not limited to a lack of an inground swimming pool, 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: 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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