

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jason Rynes

DOCKET NO.: 21-03329.001-R-1 PARCEL NO.: 11-13-101-002

The parties of record before the Property Tax Appeal Board are Jason Rynes, 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: \$65,803 **IMPR.:** \$227,714 **TOTAL:** \$293,517

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 2-story dwelling of frame and brick exterior construction with 4,611 square feet of living area. The dwelling was constructed in 2013 and is approximately 8 years old. Features of the home include an unfinished full basement, central air conditioning, three fireplaces, and a 712 square foot attached garage. The property has an approximately 58,526 square foot site and is located in Green Oaks, Libertyville 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 suggested equity comparables located in the same assessment neighborhood code as the subject property and located within 0.33 of a mile from the subject. The comparables are improved with 2-story dwellings of brick exterior construction ranging in size from 3,920 to 5,541 square feet of living area. The dwellings range in age from 20 to 23 years old. Each comparable has an unfinished basement, central air conditioning, one to three fireplaces, and a garage that ranges in size from 774 to 957

square feet of building area. The comparables have improvement assessments that range from \$173,559 to \$236,193 or from \$44.28 to \$46.46 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$204,152 or \$44.27 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 \$293,517. The subject property has an improvement assessment of \$227,714 or \$49.38 per square foot of living area.

In written comments, the board of review asserted that its comparables were the only homes built in the neighborhood in the last 20 years.

In support of its contention of the correct assessment, the board of review submitted information on three suggested equity comparables located in the same neighborhood code as the subject property and within 0.18 of a mile from the subject. The comparables are improved with 1-story or 2-story dwellings of frame or frame and brick exterior construction ranging in size from 3,273 to 4,653 square feet of living area. The dwellings were built from 2003 to 2020 and thus range in age from approximately 1 to 8 years old. Each comparable has an unfinished basement, central air conditioning, one to five fireplaces, and a garage ranging in size from 778 to 1,127 square feet of building area. The comparables have improvement assessments ranging from \$199,476 to \$251,345 or from \$47.10 to \$60.95 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 taxpayer 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 seven suggested comparables for the Board's consideration. The Board gives less weight to the appellant's comparables and board of review comparable #1 which are less similar to the subject in age or dwelling size than other comparables in this record.

The Board finds the best evidence of assessment equity to be the board of review comparables #2 and #3 which are overall more similar to the subject in location, design, dwelling size, and features. These two comparables have improvement assessments of \$251,345 and \$206,989 or of \$54.02 and \$47.10 per square foot of living area, respectively. The subject's improvement assessment of \$227,714 or \$49.38 per square foot of living area falls is bracketed by the two best comparables in this record. Based on this record and after considering adjustments to the two best comparables for differences when compared to 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.

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Member	Member
Dan De Kinin	Swan Bokley
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
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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 <u>PETITION AND EVIDENCE</u> 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

Jason Rynes, by attorney: Robert Rosenfeld Robert H. Rosenfeld & Associates, LLC 40 Skokie Blvd Suite 150 Northbrook, IL 60062

COUNTY

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