



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

APPELLANT: Eileen Schmidtke
DOCKET NO.: 21-03503.001-R-1
PARCEL NO.: 15-29-305-025

The parties of record before the Property Tax Appeal Board are Eileen Schmidtke, 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: \$22,997
IMPR.: \$86,477
TOTAL: \$109,474

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 dwelling¹ of wood siding exterior construction with 1,852 square feet of living area. The dwelling was constructed in 1972, is approximately 49 years old, and has an effective age of 1973. Features of the home include a crawl space foundation, central air conditioning, a fireplace, and a 455 square foot garage. The property has an 8,775 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

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

¹ The parties differ regarding the subject's design and dwelling size. The Board finds the best evidence of design and dwelling size to be the subject's property record card presented by the board of review which contains a sketch with measurements and was not refuted by the appellant in written rebuttal.

comparables are improved with 2-story homes of wood siding exterior construction ranging in size from 1,881 to 2,044 square feet of living area. The dwellings range in age from 49 to 51 years old. Each home has a crawl space foundation and central air conditioning. Three homes each have a garage ranging in size from 252 to 455 square feet of building area. The comparables have improvement assessments ranging from \$56,368 to \$82,045 or from \$29.97 to \$40.14 per square foot of living area. Based on this evidence the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$109,474. The subject property has an improvement assessment of \$86,477 or \$46.69 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 located within the same assessment neighborhood code as the subject. The comparables are improved with 2-story homes of wood siding exterior construction ranging in size from 1,746 to 2,000 square feet of living area. The dwellings were built in 1972 or 1973 and three comparables have effective ages ranging from 1973 to 1980. Each home has a crawl space foundation, central air conditioning, and a 252 or a 455 square foot garage. One home has a fireplace. The comparables have improvement assessments ranging from \$78,852 to \$86,937 or from \$43.47 to \$46.49 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 eight equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparable #1, which has a significantly lower assessment than other comparables in this record, suggesting this property is an outlier. The Board gives less weight to the appellant's comparable #2, which lacks a garage that is a feature of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3 and #4 and the board of review's comparables, which are similar to the subject in dwelling size, age/effective age, location, and most features, although two of the comparables have smaller garages than the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These most similar comparables have improvement assessments that range from \$74,358 to \$86,937 or from \$37.59 to \$46.49 per square foot of living area. The subject's improvement assessment of \$86,477 or \$46.69 per square foot of living area falls within the range established by the best comparables in terms of total improvement assessment and just above the range on a per square foot basis; however, after

considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's assessment is supported. Based on 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 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: June 27, 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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