



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

APPELLANT: Janet R. Bernstein
DOCKET NO.: 21-05081.001-R-1
PARCEL NO.: 16-36-403-024

The parties of record before the Property Tax Appeal Board are Janet R. Bernstein, the appellant, by attorney Ronald Kingsley of Lake County Real Estate Tax Appeal, LLC in Lake Forest; 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: \$67,006
IMPR.: \$87,712
TOTAL: \$154,718

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 vinyl siding exterior construction with 2,492 square feet of living area.¹ The dwelling was constructed in 1938 and has a reported effective age of 1947. Features of the home include a basement with finished area, central air conditioning, two fireplaces and a 420 square foot garage. The property has an 8,902 square foot site and is located in Highland Park, Moraine 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 12 equity comparables that have the same assessment neighborhood code as the subject and are located

¹ The Board finds the best description of the subject property is found in the subject's property record card provided by the board of review disclosing the subject dwelling has vinyl siding exterior construction and finished basement area, which was not refuted by the appellant.

from .10 of a mile to 1.03 miles from the subject. The comparables are improved with 2-story dwellings ranging in size from 2,372 to 2,610 square feet of living area. The dwellings were built from 1907 to 1966 with seven comparables having reported effective ages ranging from 1915 to 1969. Each comparable has a basement, a fireplace and a garage ranging in size from 220 to 552 square feet of building area. Eleven comparables have central air conditioning. The comparables have improvement assessments ranging from \$71,970 to \$117,217 or from \$28.82 to \$47.67 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$82,548 or \$33.13 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 \$154,718. The subject property has an improvement assessment of \$87,712 or \$35.20 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on five equity comparables that have the same assessment neighborhood code as the subject and are located from .37 of a mile to 1.12 miles from the subject property. The comparables are improved with 1.5-story, 1.75-story or 2-story dwellings of brick or wood siding exterior construction ranging in size from 2,295 to 2,641 square feet of living area. The dwellings were built from 1926 to 1956 with four comparables having reported effective ages ranging from 1952 to 1958. The comparables each have a basement, four of which have finished area. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 273 to 550 square feet of building area. The comparables have improvement assessments ranging from \$82,276 to \$95,596 or from \$35.24 to \$38.19 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 record contains a total of 17 suggested equity comparables for the Board's consideration. The Board has given less weight to the appellant's comparables, as well as board of review comparable #2 due to their lack of finished basement area and/or central air conditioning, which are both features of the subject.

The Board finds the best evidence of assessment equity to be board of review comparables #1, #3, #4 and #5. These four comparables each have finished basement area and central air conditioning, like the subject and are relatively similar to the subject in location, dwelling size and some features. The comparables have improvement assessments that range from \$84,867 to \$95,596 or from \$36.20 to \$38.19 per square foot of living area. The subject's improvement

assessment of \$87,712 or \$35.20 per square foot of living area falls within the range established by the best comparables in the record in terms of overall improvement assessment and below the comparables on a square foot basis. After considering adjustments to the 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.



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:

July 18, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Janet R. Bernstein, by attorney:
Ronald Kingsley
Lake County Real Estate Tax Appeal, LLC
13975 W. Polo Trail Drive
#201
Lake Forest, IL 60045

COUNTY

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