



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

APPELLANT: Eugene M. & Debra D. Feldman  
DOCKET NO.: 22-00250.001-R-1  
PARCEL NO.: 15-16-105-007

The parties of record before the Property Tax Appeal Board are Eugene M. & Debra D. Feldman, the appellants, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. 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:** \$44,833  
**IMPR.:** \$148,444  
**TOTAL:** \$193,277

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 2022 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 wood siding and brick exterior construction with 2,708 square feet of living area. The dwelling was built in 1994. Features of the home include an unfinished basement, central air conditioning, one fireplace, and a garage with 484 square feet of building area. The property has an approximately 11,030 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted information on three comparable sales located in the subject's assessment neighborhood. The properties have sites with either 9,250 or 9,460 square feet of land area. The comparables are improved with 2-story dwellings of wood siding and brick exterior construction ranging in size from 2,560 to 3,213 square feet of living area. The homes were each built in

1994. The comparables each have a basement, two of which have finished area.<sup>1</sup> Each comparable has central air conditioning, one or two fireplaces, and a garage ranging in size from 440 to 484 square feet of building area. The comparables sold from August 2020 to April 2021 for prices ranging from \$535,000 to \$630,000 or from \$196.08 to \$211.71 per square foot of living area, land included. Based on this evidence, the appellants requested a reduction in the subject's assessment to \$185,562 which reflects a market value of \$556,742 or \$205.59 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$193,277. The subject's assessment reflects a market value of \$579,889 or \$214.14 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.<sup>2</sup>

In support of its contention of the correct assessment, the board of review submitted information on five comparable sales located in the subject's assessment neighborhood. Board of review comparables #1 and #3 are the same properties as the appellant's comparables #1 and #2, respectively. The properties have sites that range in size from 9,148 to 14,375 square feet of land area. The comparables are improved with 2-story dwellings of frame or brick and frame exterior construction ranging in size from 2,560 to 2,834 square feet of living area. The dwellings were built from 1992 to 2001. The comparables each have a basement, four of which have finished area. The basement for comparable #4 was described as being a walkout. Four comparables each have central air conditioning. Three comparables each have one fireplace. Each comparable has a garage ranging in size from 440 to 726 square feet of building area. The comparables sold from March 2021 to February 2022 for prices ranging from \$535,000 to \$715,000 or from \$208.98 to \$252.92 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The appellants contend the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of six comparable sales to support their respective positions, which includes two sales shared by the parties. The Board gives less weight to the appellants' comparable #3 which is a substantially larger home than the subject as well as having a 2020 sale

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<sup>1</sup> The board of review reported the appellants' comparable #2 had basement finish, a feature not disclosed by the appellant, nor was this refuted in written rebuttal by the appellants, when provided an opportunity.

<sup>2</sup> Property Tax Appeal Board procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for tax year 2022.

date occurring less proximate in time to the subject's January 1, 2022 assessment date at issue than other comparables in this record.

The Board finds the best evidence of market value to be the parties' five remaining comparables which sold proximate in time to the subject's assessment date and are similar to the subject in design, age, dwelling size, and most features. However, four of these comparables have basement finish, a feature the subject lacks, suggesting downward adjustments for this difference would be necessary to make them more equivalent to the subject. These properties sold from March 2021 to February 2022 for prices ranging from \$535,000 to \$715,000 or from \$208.98 to \$252.92 per square foot of living area, land included. The subject's assessment reflects a market value of \$579,889 or \$214.14 per square foot of living area, land included, which falls within the range established by the best comparable sales in this record. Based on this evidence and after considering the appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellants failed to prove by a preponderance of the evidence that a reduction in the subject's assessment is justified based on overvaluation.

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: March 26, 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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