

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: John Doyle

DOCKET NO.: 22-00807.001-R-1 PARCEL NO.: 16-05-405-025

The parties of record before the Property Tax Appeal Board are John Doyle, 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:** \$96,698 **IMPR.:** \$171,873 **TOTAL:** \$268,571

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 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 brick exterior construction with 3,171 square feet of living area. The dwelling was constructed in 1986 and is approximately 36 years old. Features of the home include an unfinished basement, central air conditioning, two fireplaces, and an attached 744 square foot garage. The property has an approximately 17,010 square foot site and is located in Lake Forest, West Deerfield 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 equity comparables that have the same assessment neighborhood code as the subject property. The comparables consist of 2-story dwellings of brick or wood siding exterior construction containing from 3,038 to 3,185 square feet of living area. The homes are from 36 to 41 years old. The comparables each have a basement, one of which has finished area, central air

conditioning, one or two fireplaces, and a garage ranging in size from 552 to 650 square feet of building area. The comparables have improvement assessments ranging from \$135,863 to \$144,468 or from \$43.63 to \$45.56 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$141,585 or \$44.65 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 \$268,571. The subject property has an improvement assessment of \$171,873 or \$54.20 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" with information on five equity comparables that have the same assessment neighborhood code as the subject. The comparables consist of 2-story dwellings of brick exterior construction containing from 3,309 to 3,330 square feet of living area. The homes were built from 1985 to 1991. The comparables each have a basement, one of which has finished area. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 528 to 780 square feet of building area. The comparables have improvement assessments ranging from \$200,050 to \$221,486 or from \$60.49 to \$66.71 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 nine equity comparables for the Board's consideration. The Board gives less weight to appellant's comparable #4 and board of review comparable #5 which have a finished basement area when compared to the subject's unfinished basement.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables which are all relatively similar to the subject in location, dwellings size, age, and most features. These seven comparables have improvement assessments ranging from \$135,863 to \$221,486 or from \$43.63 to \$66.71 per square foot of living area. The subject's improvement assessment of \$171,873 or \$54.20 per square foot of living area falls within the range established by the best comparables in the record. Based on this record and after considering adjustments to the best comparables for differences from 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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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:	April 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**

John Doyle, 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