



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

APPELLANT: Steven Pak
DOCKET NO.: 22-00820.001-R-1
PARCEL NO.: 13-13-114-018

The parties of record before the Property Tax Appeal Board are Steven Pak, 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: \$22,650
IMPR.: \$119,015
TOTAL: \$141,665

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 1-story dwelling of brick exterior construction with 2,546 square feet of living area. The dwelling was constructed in 1957 and is approximately 65. Features of the home include a partially finished basement, central air conditioning, two fireplaces, and a 475 square foot garage¹. The property has an approximately 20,704 square foot site and is located in North Barrington, Cuba Township, Lake County.

The appellant contends assessment inequity with regard to the improvement assessment as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located in the same assessment neighborhood code as the subject property and within 0.40 of a mile from the subject. The comparables are improved with 1-story homes

¹ The property record card presented by the board of review, including a schematic drawing with measurements, revealed the subject has a 475 square foot garage which was not disclosed nor refuted by the appellant in rebuttal.

of brick or wood siding exterior construction ranging in size from 1,645 to 2,635 square feet of living area. The homes range in age from 56 to 67 years old. The comparables each have a partially finished basement with two of these being walkouts. Three comparables each have central air conditioning. Each comparable has two or three fireplaces and a garage that ranges in size from 504 to 819 square feet of building area. Comparable #1 has a pool and pool house. The comparables have improvement assessments ranging from \$71,732 to \$139,549 or from \$43.61 to \$52.96 per square foot of living area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment to \$101,944 or \$40.04 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 \$141,665. The subject property has an improvement assessment of \$119,015 or \$46.75 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 located in the same assessment neighborhood code as the subject property and within 0.67 of a mile from the subject. The comparables are improved with 1-story homes of brick exterior construction ranging in size from 2,103 to 2,918 square feet of living area. The homes were built from 1948 to 1964 with comparables #4 and #5 having effective ages of 1955 and 1968, respectively. Four comparables each have a partially finished basement. Each comparable has central air conditioning, one to three fireplaces, and a garage that ranges in size from 441 to 717 square feet of building area. The comparables have improvement assessments ranging from \$83,349 to \$140,712 or from \$38.68 to \$55.61 per square foot of living area. Based on this evidence the board of review requested confirmation of the subject's improvement 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 nine equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparable #1 which has a pool and pool house, which are not features of the subject. The Board also gives less weight to the appellant's comparables #2, #3, and #4 as well as board of review comparables #2, #3, and #4 which are less similar to the subject in dwelling size than other comparables in this record.

The Board finds the best evidence of assessment equity to be board of review comparables #1 and #5 which are more similar to the subject in location, design, age, dwelling size, and some features. However, board of review comparable #1 lacks a basement foundation suggesting an upward adjustment for this difference would be necessary to it make it more equivalent to the

subject. Nevertheless, these comparables have improvement assessments of \$103,655 and \$140,355 or of \$38.68 and \$55.61 per square foot of living area. The subject's improvement assessment of \$119,015 or \$46.75 per square foot of living area is bracketed by the two best comparables in this record. Based on this record and after considering appropriate adjustments to the two 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.



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: February 20, 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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