



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

APPELLANT: Martin Rosenfeld  
DOCKET NO.: 22-00869.001-R-1  
PARCEL NO.: 15-36-103-019

The parties of record before the Property Tax Appeal Board are Martin Rosenfeld, 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:** \$102,328  
**IMPR.:** \$128,300  
**TOTAL:** \$230,628

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 wood siding exterior construction with 3,228 square feet of living area. The dwelling was constructed in 1972 and is approximately 50 years old. Features of the home include a concrete slab foundation, central air conditioning, two fireplaces, an 800 square foot attached garage, and a shed. The property has an approximately 85,990 square foot site and is located in Riverwoods, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales that have the same assessment neighborhood code as the subject and are located from 0.23 of a mile to 1.91 miles from the subject property. These properties have sites ranging in size from 45,062 to 205,315 square feet of land area that are improved with 1-story dwellings of brick or wood siding exterior construction ranging in size from 2,734 to 3,715 square feet of living area. The homes are from

39 to 67 years old. Three comparables have either concrete slab or crawl space foundations, and one comparable has a basement with finished area. Each comparable has central air conditioning, one to two fireplaces and an attached garage ranging in size from 431 to 933 square feet of building area. Other improvements include comparables #1 and #3 each have a detached garage and comparable #4 has hot tubs. These comparables sold from February 2020 to March 2022 for prices ranging from \$435,000 to \$650,000 or from \$159.11 to \$188.86 per square foot of living area, including land.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$184,910 which reflects a market value of \$554,785 or \$171.87 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 \$230,628. The subject's assessment reflects a market value of \$693,410 or \$214.81 per square foot of living area, land included, when using the 2022 three-year average median level of assessment for Lake County of 33.26% as determined by the Illinois Department of Revenue.

With respect to the appellant's evidence, the board of review noted the "Appellant comparable #1 sold in 2020 approximately 23 months prior to the January 1, 2022 assessment date," that appellant comparable #3 is located on Deerfield Road which has, "per IDOT," a daily traffic count between 16,600 and 17,400 cars relative to the subject that only sees local traffic on Blackthorn Road, and that the MLS datasheet provided by the board of review for appellant comparable #4 was described in the listing as a "rehab opportunity" and "Estate being sold as-is" condition.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales that have the same assessment neighborhood code as the subject and are located from 0.38 of a mile to 2.04 miles from the subject property. The properties have sites ranging in size from 36,590 to 187,285 square feet of land area that are improved with 1-story dwellings of frame or brick exterior construction ranging in size from 3,169 to 3,302 square feet of living area. The dwellings were built from 1961 to 1996 with comparables #1 and #2 having effective ages of 1971 and 1986, respectively. The board of review reported one comparable has a basement with finished area, and each comparable has central air conditioning and an attached garage ranging in size from 696 to 1,406 square feet of building area. Two comparables have either one or two fireplaces. Comparable #1 has an inground swimming pool with a pool enclosure. These comparables sold from May 2021 to April 2022 for prices ranging from \$672,500 to \$875,000 or from \$209.31 to \$276.11 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The appellant contends 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 appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted seven comparable sales for the Board's consideration. The Board gives less weight to appellant comparables #1 and #3 along with board of review comparables #1 and #3 due to differences from the subject in lot size, age, foundation type and/or presence of an enclosed inground swimming pool, which is not a feature of the subject property. Moreover, the board of review noted the appellant comparable #1 had a remote sale date that occurred in 2020. Additionally, less weight was also given by the Board to appellant comparable #4 as the MLS data sheet provided by the board of review indicated the sale was listed as a "rehab opportunity" and "Estate being sold as is," which was not refuted by the appellant, and brings into question whether the property is reflective of the subject's condition.

The Board finds the best evidence of market value to be appellant's comparable #2 and board of review comparable #2. These comparables sold proximate in time to the subject's January 1, 2022 assessment date at issue and are most similar to the subject in age, dwelling size, lack of a basement foundation, and/or some features. These two comparables sold in March 2022 and April 2022 for prices of \$515,000 and \$672,500 or of \$164.43 and \$209.31 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$693,410 or \$214.81 per square foot of living area, land included, which falls above the two most similar comparables in the record and is logical given the subject's larger site size and additional shed amenity relative to the two best comparables in the record. Based on the record and after considering adjustments to the two best comparables for differences from the subject, the Board finds no reduction in the subject's estimated market value as reflected by its assessment is warranted.

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:

May 21, 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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