



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

APPELLANT: Peter Frain
DOCKET NO.: 22-00882.001-R-1
PARCEL NO.: 15-30-102-019

The parties of record before the Property Tax Appeal Board are Peter Frain, 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: \$49,987
IMPR.: \$132,907
TOTAL: \$182,894

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 wood siding exterior construction with 2,688 square feet of living area. The dwelling was constructed in 1986 and is approximately 36 years old. The home features an unfinished basement, central air conditioning, a fireplace, and an attached garage with 840 square feet of building area. The property is located in Long Grove, Vernon 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 located in the same assessment neighborhood code as the subject. The comparables consist of 2-story dwellings of brick or wood siding exterior construction ranging in size from 2,870 to 3,810 square feet of living area. The comparables are from 34 to 44 years old. The dwellings each have a basement with two having finished area and one having a walkout design.

Each comparable has central air conditioning, one or two fireplaces and an attached garage ranging in size from 532 to 864 square feet of building area. The comparables have improvement assessments that range from \$126,853 to \$167,802 or from \$39.49 to \$45.24 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$182,894. The subject property has an improvement assessment of \$132,907 or \$49.44 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. The comparables consist of 2-story dwellings of frame or brick and frame exterior construction ranging in size from 2,684 to 3,016 square feet of living area. The homes were built from 1979 to 1983. The dwellings each have a basement with three having finished area and one having a walkout design. Each comparable has central air conditioning, one to three fireplaces and an attached garage ranging in size from 682 to 1,022 square feet of building area. Comparable #4 has a shed, and comparable #5 has an inground swimming pool. The comparables have improvement assessments that range from \$135,772 to \$179,417 or from \$49.44 to \$59.49 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 a total of nine equity comparables for the Board's consideration. The Board gives less weight to appellant's comparables #1, #2 and #3 along with board of review comparables #2, #3, #4 and #5 due to differences in their dwelling sizes and/or basement finish when compared to the subject. Moreover, the board of review comparable #5 has an inground swimming pool, which is not a feature of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparable #4 and board of review comparable #1 which are relatively similar to the subject in location, age, dwelling size, and most features. The two comparables have improvement assessments of \$129,847 and \$137,483 or \$45.24 and \$49.44 per square foot of living area, respectively. The subject's improvement assessment of \$132,907 or \$49.44 per square foot of living area is bracketed by the two best comparables on an overall improvement assessment basis and matches the board of review comparable #1 with the highest per-square-foot value. Based on this record and after considering 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: 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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