



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

APPELLANT: Marian Nagorzanski
DOCKET NO.: 22-00885.001-R-1
PARCEL NO.: 15-31-103-010

The parties of record before the Property Tax Appeal Board are Marian Nagorzanski, 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: \$36,157
IMPR.: \$207,201
TOTAL: \$243,358

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 4,628 square feet of living area. The dwelling was constructed in 1997 and is approximately 25 years old. Features of the home include a partially finished basement, 3 full and 1 half bathrooms, central air conditioning, two fireplaces, and an 816 square foot garage. The property has an approximately 43,061 square foot site and 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 property and within 0.47 of a mile from the subject. The appellant reported the comparables are improved with 2-story dwellings of brick or wood siding exterior construction ranging in size from 4,125

to 5,144 square feet of living area. The dwellings range in age from 34 to 43 years old. The dwellings each have a basement with partially finished area, one of which is walkout style. Each comparable has from 3 full and 1 half to 7 full bathrooms, central air conditioning, one to five fireplaces, and a garage ranging in size from 736 to 962 square feet of building area. The comparables have improvement assessments that range from \$142,789 to \$208,405 or from \$30.29 to \$40.56 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$171,930 or \$37.15 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 \$243,358. The subject property has an improvement assessment of \$207,201 or \$44.77 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 0.73 of a mile from the subject. The board of review reported the comparables are improved with 1-story¹ or 2-story dwellings of brick or brick with frame exterior construction ranging in size from 4,164 to 4,790 square feet of living area. The dwellings were built from 1979 to 2003. Each comparable has a basement with four having partially finished area, from 4 full and 1 half to 4 full and 2 half bathrooms, central air conditioning, one or two fireplaces, and a garage that ranges in size from 704 to 1,248 square feet of building area. Comparable #2 has a tennis court, and comparables #3, #4 and #5 each have an inground swimming pool. The comparables have improvement assessments that range from \$183,533 to \$214,127 or from \$43.76 to \$45.74 per square foot of living area.

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 comparable #1 which appears to be an outlier with its considerably lower improvement assessment relative to the other comparables in the record. The Board also gives less weight to the appellant's comparable #2 and board of review comparables #2, #3, #4 and #5 due to differences in their ages and/or presence of a tennis court or an inground swimming pool, which are not features of the subject. Additionally, the Board gives reduced weight to the appellant's comparable #3 which has larger dwelling size, seven bathrooms, and five fireplaces.

¹ The board of review reported comparable #5 is a 1-story home with two floors; however, the Board finds its above ground living area exceeds its first floor living area suggesting this home is a part 2-story dwelling.

The Board finds the best evidence of assessment equity to be appellant's comparable #4 and board of review comparable #1 which are overall more similar to the subject in location, design, age, dwelling size, foundation type, and most features. These two comparables have improvement assessments of \$167,297 and \$191,159 or \$40.56 and \$45.74 per square foot of living area, respectively. The subject's improvement assessment of \$207,201 or \$44.77 per square foot of living area falls above the two best comparables in this record which is logical when considering the subject's larger dwelling size relative to these comparables. Based on this record and after considering appropriate 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.



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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