



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

APPELLANT: Michael Teich
DOCKET NO.: 22-01067.001-R-1
PARCEL NO.: 16-36-205-026

The parties of record before the Property Tax Appeal Board are Michael Teich, 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: \$106,298
IMPR.: \$165,870
TOTAL: \$272,168

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 two-story dwelling of stone and wood siding exterior construction¹ with 4,084 square feet of living area. The dwelling was constructed in 1951 and is approximately 71 years old, with a reported effective age of 1978. Features of the home include a full unfinished basement, central air conditioning, two fireplaces and a 437 square foot garage. The property has an approximately 16,840 square foot site and is located in Highland Park, Moraine 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 located in the same assessment neighborhood code as the subject and from .02 to .78 of a mile from the subject. The parcels

¹ Additional details regarding the subject property not reported by the appellant are found in the subject's property record card presented by the board of review.

range in size from 8,738 to 25,299 square feet of land area, each of which are improved with a multi-story dwelling of 1.8, 2 or 3-story design, with brick or stone exterior construction. The homes range in age from 55 to 91 years old and range in size from 3,660 to 4,410 square feet of living area. Each dwelling has a full basement, two of which have finished area. Features include central air conditioning, one or two fireplaces and a garage ranging in size from 462 to 600 square feet of building area. The comparables sold from August 2020 to April 2021 for prices ranging from \$597,000 to \$735,000 or from \$148.84 to \$179.84 per square foot of living area, including land.

Based on the foregoing evidence, the appellant requested a reduced total assessment of \$237,290 which reflects a market value of \$711,941 or \$174.32 per square foot of living area, including land, 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 \$272,168. The subject's assessment reflects a market value of \$816,586 or \$199.95 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In response to the appeal, the board of review provided notes of the Moraine Township Assessor. The assessor asserted that 17 years previously, in 2005, the subject property had a permit valued at \$269,750 for an addition. Appellant's comparable sale #2 reported had a mansard roof permit after purchase with \$250,000 interior remodel. Appellant's comparable sale #3 reported "needs work and updating" and appellant's comparable #4 had "permit \$475,000 interior remodel/addition." No documentation was provided to support any of the assertions concerning the comparable properties. The subject's property record card depicts the 2005 permit for an addition.

In support of its contention of the correct assessment, the board of review submitted information on five comparable sales located in the same assessment neighborhood code as the subject and from .43 to .87 of a mile from the subject. The parcels range in size from 9,610 to 96,060 square feet of land area, each of which are improved with a multi-story dwelling of either 2 or 2.5-story design, with brick, stone, brick and stucco or brick and wood siding exterior construction. The homes were built from 1925 to 1947 and four of the homes have reported effective ages ranging from 1963 to 1983. These dwellings reflect original ages ranging from 75 to 97 years old. The dwellings range in size from 3,320 to 3,913 square feet of living area. Each dwelling has a full basement, four of which have finished area. Features include central air conditioning, one to four fireplaces and a garage ranging in size from 418 to 630 square feet of building area. The comparables sold from September 2021 to October 2022 for prices ranging from \$1,254,000 to \$1,450,018 or from \$333.95 to \$436.75 per square foot of living area, including land.

Based on this evidence and argument, the board of review requested confirmation of the subject's estimated market value of \$816,586 as reflected by its assessment.

² Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2022.

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 a total of nine comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1, #3 and #4, each of which sold in 2020, a date more remote in time to the lien date at issue and thus less likely to be indicative of the subject's market value. The Board has also given reduced weight to board of review comparables #2 and #3 due differences in dwelling size and/or lot size when compared to the subject property.

On this limited record, the Board finds the best evidence of market value to be appellant's comparable sale #2 and board of review comparables #1, #4 and #5, which are like the subject in location and present varying degrees of similarity to the subject in age, dwelling size, basement size and some features, including but not limited to finished basement area which is not a feature of the subject. These most similar comparables sold from April 2021 to October 2022 for prices ranging from \$731,250 to \$1,450,018 or from \$165.82 to \$376.62 per square foot of living area, including land. The subject's assessment reflects a market value of \$816,586 or \$199.95 per square foot of living area, including land, which is within the range of the best comparable sales in this record. The Board finds there is no explanation on this record for the divergent market values of these properties. Each of these four best comparables would necessitate downward adjustments to account for their finished basement areas when compared to the subject's unfinished basement. In addition, while the Property Tax Appeal Board recognizes that these board of review comparables present significantly higher prices than either the estimated market value of the subject or appellant's comparable #2, as presented in these grid analyses there is simply no good explanation for these pricing differences. Nevertheless, the Board finds that this record demonstrates that the subject is not overvalued.

In conclusion, based on the foregoing evidence and after considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds 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:

April 16, 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

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