



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

APPELLANT: Michelle Macinnis  
DOCKET NO.: 22-03296.001-R-1  
PARCEL NO.: 16-07-303-006

The parties of record before the Property Tax Appeal Board are Michelle Macinnis, the appellant, by attorney Eric Feldman of Eric Feldman & Assoc. P.C. in Chicago; 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:** \$110,418  
**IMPR.:** \$135,957  
**TOTAL:** \$246,375

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 brick and wood siding exterior construction with 3,080 square feet of living area. The dwelling was constructed in 1973. Features of the home include a concrete slab foundation, central air conditioning, two fireplaces and a 529 square foot garage. The property has an approximately 20,350 square foot site and is located in Lake Forest, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on five comparable sales that have the same assessment neighborhood code as the subject and are located within .37 of a mile from the subject property. The parcels range in size from 23,830 to 35,090 square feet of land area. The comparables are improved with two-story dwellings of brick, wood siding or brick and wood siding exterior construction ranging in size from 2,889 to 3,346 square feet of living area. The dwellings were

built from 1965 to 1976 with comparable #1 built in 1965 having a reported effective age of 1970. Two comparables each have a basement with finished area and three comparables each have a concrete slab foundation. Each comparable has central air conditioning, one to three fireplaces and a garage ranging in size from 484 to 713 square feet of building area. The comparables sold from November 2020 to November 2021 for prices ranging from \$510,000 to \$782,500 or from \$176.53 to \$250.96 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$196,105, which would reflect a market value of \$588,374 or \$191.03 per square foot of ground living area, including land, when using 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 \$246,375. The subject's assessment reflects a market value of \$740,755 or \$240.50 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.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales that have the same assessment neighborhood code as the subject and are located within .45 of a mile from the subject property. The board of review's comparable #3 is the same property as the appellant's comparable #4. Three parcels have sites that range in size from 20,020 to 35,090 square feet of land area. No site size was provided for board of review comparable #2. The comparables are improved with two-story dwellings of brick and wood siding exterior construction ranging in size from 3,000 to 3,404 square feet of living area. The dwellings were built from 1965 to 1977. Comparable #1 has a basement with finished area and three comparables each have a concrete slab foundation. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 506 to 744 square feet of building area. The comparables sold from January 2021 to June 2022 for prices ranging from \$775,000 to \$800,000 or from \$235.02 to \$258.33 per square foot of living area, including land.

The board of review also submitted the Multiple Listing Service (MLS) listing sheet for the 2019 sale of the subject property. The listing revealed the subject had over \$100,000 in recent renovations and was purchased in May 2019 for \$775,000 or \$251.62 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 record contains eight comparable sales for the Board's consideration, as one sale was common to both parties. The Board has given less weight to the appellant's comparable #5

which appears to be an outlier due to its considerably lower sale price of \$510,000 or \$176.53 per square foot of living area, including land when compared to the other sales in the record. The Board has also given less weight to the appellant's comparables #1 and #3, as well as board of review comparable #1 due to their finished basements when compared to the subject's concrete slab foundation. The Board has given reduced weight to board of review comparable #2 as no site size was provided, which would allow the Board to conduct a meaningful comparative analysis with the subject.

The Board finds the best evidence of market value to be the appellant's comparable #2 and the appellant's comparable #4/board of review comparable #3, along with board of review comparable #4. The Board finds these three comparables have concrete slab foundations, like the subject and are similar to the subject in location, dwelling size, design, age and some features. However, two comparables have larger site sizes when compared to the subject, suggesting downward adjustments would be required to make these comparables more equivalent to the subject. Nevertheless, these most similar comparables sold from November 2020 to May 2022 for prices ranging from \$625,000 to \$782,500 or from \$209.38 to \$258.33 per square foot of living area, including land. The subject's assessment reflects a market value of \$740,755 or \$240.50 per square foot of living area, including land, which falls within the range established by the best comparable sales in the record and is considerably less than the subject's somewhat dated 2019 purchase price of \$775,000 or \$251.62 per square foot of living area, including land, indicating the subject is not overvalued for assessment purposes. Therefore, based on this record and after considering 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

AGENCY

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Michelle Macinnis, by attorney:  
Eric Feldman  
Eric Feldman & Assoc. P.C.  
53 W. Jackson Blvd.  
Suite 1622  
Chicago, IL 60604

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085