FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Steven Fox
DOCKET NO.: 23-00343.001-R-1
PARCEL NO.: 16-08-204-008

The parties of record before the Property Tax Appeal Board are Steven Fox, the appellant, by attorney Gregory Riggs of Tax Appeals Lake County in Lake Zurich; 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:	$85,382
IMPR.:	$150,981
TOTAL:	$236,363

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 2023 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 2,796 square feet of living area. The dwelling was constructed in 1976 and is approximately 47 years old. Features of the home include a basement, central air conditioning, a fireplace, 3½ bathrooms and a 420 square foot garage. The property has an approximately 16,915 square foot site and is located in Lake Forest, West Deerfield 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 that have the same assessment neighborhood code as the subject. The comparables are improved with 1.75-story or 2-story dwellings of wood exterior construction ranging in size from 2,678 to 2,741 square feet of living area. The dwellings were built from 1972 to 1977. The comparables each have a basement, two of which have finished area. Each comparable has central air conditioning, a fireplace, 2½ or 3 bathrooms and a garage ranging in size from 420 to 625 square feet of building area. The comparables have improvement assessments ranging from $136,386 to $145,027 or from $50.59 to $52.91 per square foot of living area.

Based on this evidence, the appellant requested the subject's improvement assessment be reduced to $141,768 or $50.72 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 $236,363. The subject property has an improvement assessment of $150,981 or $54.00 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables that have the same assessment neighborhood code as the subject. The comparables are improved with 2-story dwellings of wood siding or brick exterior construction ranging in size from 2,538 to 3,248 square feet of living area. The dwellings are from 46 to 56 years old. The comparables each have a basement, one of which has finished area. Each comparable has central air conditioning, a fireplace, 2½ bathrooms and a garage ranging in size from 441 to 594 square feet of building area. The comparables have improvement assessments ranging from $140,050 to $176,624 or from $53.86 to $55.18 per square foot of living area.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 record contains eight suggested equity comparables for the Board's consideration. The Board has given less weight to the appellant's comparables #1 and #4, as well as board of review comparables #2 and #4 due to their lack of basement finish or considerably larger dwelling size when compared to the subject.

The Board has given most weight to the appellant's comparables #2 and #3, along with board of review comparables #1 and #3, which have unfinished basements, like the subject and are similar to the subject in location, dwelling size and age. However, the Board finds each comparable dwelling has a fewer number of bathrooms when compared to the subject, suggesting upward adjustments would be required to make the comparables equivalent to the subject. Nevertheless, these four comparables have improvement assessments that range from $136,386 to $159,327 or from $50.59 to $54.53 per square foot of living area. The subject's improvement assessment of $150,981 or $54.00 per square foot of living area falls within the range established by the best comparables in the record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement is inequitably assessed and a reduction in the subject's assessment is not 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:

C E R T I F I C A T I O N

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: August 20, 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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