



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

APPELLANT: William and Susan Abrams
DOCKET NO.: 23-00705.001-R-2
PARCEL NO.: 16-24-307-017

The parties of record before the Property Tax Appeal Board are William and Susan Abrams, the appellants, 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: \$135,872
IMPR.: \$478,794
TOTAL: \$614,666

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 two-story dwelling of dryvit exterior construction with 4,703 square feet of living area. The dwelling was constructed in 1995, with an effective age of 2014. Features of the home include a full basement with finished area, central air conditioning, a fireplace and a 714 square foot garage. The property has a 21,345 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted an appraisal estimating the subject property had a market value of \$1,350,000 as of January 1, 2023. The appraisal was prepared by Charles Schwarz a certified real estate appraiser, for "tax review and tax appeal" purposes.

Under the sales comparison approach, the appraiser selected four comparable sales located from 0.33 of a mile to 1.5 miles from the subject property. The parcels range in size from 11,151 to 22,377 square feet of land area and are improved with two-story dwellings of brick, frame, stone and stucco, or dryvit exterior construction ranging in size from 3,899 to 4,629 square feet of living area. The dwellings are from 34 to 96 years old. The comparables sold from March 2022 to May 2023 for either \$1,300,000 or \$1,350,000 or from \$280.84 to \$333.42 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject in gross living area, finished basement area, number of rooms, and for full and half bathrooms to arrive at adjusted sales prices ranging from \$1,343,700 to \$1,350,200 or from \$290.28 to \$346.24 per square foot of living area, including land. Based on this analysis, the appraiser concluded a value of \$1,350,000, including land, for the subject as of January 1, 2023.

Based on this evidence, the appellants requested a reduction in the subject's total assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$614,666. The subject's assessment reflects a market value of \$1,844,182 or \$392.13 per square foot of living area, land included, when applying the statutory level of assessments of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with three, two-story dwellings and one, 1.75-story dwelling of brick exterior construction that range in size from 4,559 to 5,377 square feet of living area. The homes are from 9 to 26 years old and have sites ranging in size from 16,000 to 33,829 square feet of land area. Each comparable has a basement with finished area, central air conditioning, one to three fireplaces, and a garage ranging in size from 644 to 888 square feet of building area. One comparable also has an in-ground swimming pool. Three of the comparables have the same assessment neighborhood code as the subject, while all the comparables are located from 0.24 to 0.60 of a mile from the subject property. The sales occurred from March 2022 to April 2023 for prices ranging from \$2,050,000 to \$2,300,000 or from \$427.75 to \$482.56 per square foot of living area, including land.

In response to the appellants' appraisal report, the board of review noted the appraisal report did not acknowledge the subject dwelling's effective age of 2014 due to its recent remodeling in 2021-2022. In addition, the board of review stated all the sales within the appraisal were sold within nine days of being listed and argued the appraisal did not account or adjust for location or age. The board of review requested the subject's total assessment be confirmed.

Conclusion of Law

The appellants contend 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

¹ Section 1910.50(c)(1) of the Board's procedural rules 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 Section 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for the tax year 2023.

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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

In support of their respective arguments, the appellants presented an appraisal and the board of review offered four comparable sales for the Board's consideration. The Board has given reduced weight to the value conclusion contained within the appellants' appraisal report as the appraisal relied on three dwellings that were each significantly older than the subject dwelling without making any adjustments or explanation to justify the lack of adjustments. The comparables #2, #3, and #4 contained in the appraisal are from 60 to 87 years older than the effective age of the subject dwelling and the appraiser failed to account for these differences with any apparent adjustments. Thus, having analyzed the appraisal, the Board finds that the report fails to produce a credible and/or reliable indicator of the subject's estimated market value considering three of the comparable sales and their respective age differences when compared to the subject dwelling.

On this record, the Board finds the best evidence of market value to be the board of review's comparable sales, which are more similar to the subject with respect to age, location, lot size, dwelling size, and have similar features when compared to the subject, although adjustments to these comparables to account for differences in some features, would be needed to make them more equivalent to the subject. The board of review's comparables sold from March 2022 to April 2023 for prices ranging from \$2,050,000 to \$2,300,000 or from \$427.75 to \$482.56 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,844,182 or \$392.13 per square foot of living area, land included, falls below the range established by the best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds that 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: _____

October 15, 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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