



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

APPELLANT: Arthur Goldstein
DOCKET NO.: 23-00734.001-R-1
PARCEL NO.: 16-28-410-025

The parties of record before the Property Tax Appeal Board are Arthur Goldstein, 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 **A Reduction** 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: \$29,606
IMPR.: \$180,373
TOTAL: \$209,979

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 one-story dwelling of brick exterior construction with 1,930 square feet of living area. The dwelling is 35 years old. Features of the home include a partial basement with finished area, central air conditioning, a fireplace, and a 484 square foot garage. The property has a 2,750 square foot site and is located in Highland Park, West Deerfield Township, Lake County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant completed Section IV - Recent Sale Data of the appeal petition and submitted a Closing Disclosure showing the subject property was purchased on March 1, 2021, for a price of \$517,000 or \$267.88 per square foot of living area, including land. It was also indicated the property was advertised for sale through the Multiple Listing Service, was sold using a realtor, and the purchase was not between family members or related corporations. Based on this

evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$219,223. The subject's assessment reflects a market value of \$657,735 or \$340.80 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 three comparable sales improved with one-story dwellings of brick exterior construction that have either 2,278 or 2,292 square feet of living area. The homes are 35 years old and have sites ranging in size from 2,750 to 3,750 square feet of land area. Each comparable has a partial basement with finished area, central air conditioning, one or two fireplaces, and a 506 square foot garage. The comparables have the same assessment neighborhood code as the subject and are located on the same street and within 0.07 of a mile from the subject property. The sales occurred from July 2021 to July 2022 for prices ranging from \$660,500 to \$820,000 or from \$288.18 to \$359.96 per square foot of living area, including land.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value in the record to be the board of review's comparable #1 and the sale of the subject property. Although the subject property was sold in March 2021, the Board finds the board of review's sales comparables #2 and #3 were also sold in 2021, which does not provide a persuasive argument that the sale of the subject was not proximate in time to the January 1, 2023, date of assessment. The board of review's comparable #1 is located on the same street as the subject property and is relatively similar to the subject in terms of features and lot size, although adjustments to these comparables to account for differences in some features, would be needed to make it more equivalent to the subject. The subject was sold in March 2021 for \$517,000 or \$267.88 per square foot of living area, including land, while the board of review's comparable #1 was sold in July 2022 for \$750,000 or \$327.23 per square foot of living area, including land. The subject's assessment reflects a market value of \$657,735 or \$340.80 per square foot of living area, land included, which is higher than both the recent sale price and the board of review's comparable #1 on a per square foot basis. Based on this record the Board finds the subject's assessment is not reflective of market value and a reduction in the subject's assessment is justified.

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.

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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COUNTY

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