



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

APPELLANT: Jeffrey & Elizabet Feinberg
DOCKET NO.: 23-01634.001-R-1
PARCEL NO.: 16-36-416-004

The parties of record before the Property Tax Appeal Board are Jeffrey and Elizabet Feinberg, the appellants, by attorney Ronald Kingsley of Lake County Real Estate Tax Appeal, LLC in Hawthorn Woods, 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: \$80,670
IMPR.: \$190,554
TOTAL: \$271,224

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 is improved with a two-story dwelling of brick exterior construction containing 2,778 square feet of living area. The dwelling was constructed in 1927 and is approximately 96 years old. Features of the property include a basement with finished area, central air conditioning, three fireplaces, four bathrooms, and a detached garage with 630 square feet of building area.¹ The property has a 10,174 square foot site 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 information on three comparable sales improved with two-story dwellings that range in size from 2,229 to 2,918 square feet of living area. The homes range in age from 75

¹ The board of review submitted a copy of the subject's property record card describing the home as having one fireplace stack with three openings, which was not refuted by the appellants in rebuttal.

to 86 years old. Each comparable has a basement with finished area, central air conditioning, one fireplace, 2½ of 3½ bathrooms, and a garage ranging in size from 329 to 396 square feet of building area. The comparables have sites ranging in size from 9,518 to 10,724 square feet of land area. These properties are located from approximately .09 to .14 of a mile from the subject and have the same assessment neighborhood code as the subject property. The sales occurred from January 2021 to August 2022 for prices ranging from \$504,323 to \$799,000 or from \$203.52 to \$329.74 per square foot of building area, including land. The appellants requested the subject's total assessment be reduced to \$261,106.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$271,224. The subject's assessment reflects a market value of \$813,753 or \$292.93 per square foot of living area, land included, when using the statutory level of assessment of 33 1/3%.²

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with 1.75-story or 2-story dwellings of brick or stone exterior construction that range in size from 2,136 to 3,546 square feet of living area. The homes range in age from 75 to 88 years old. Each property has a full basement with three having finished area, central air conditioning, one or two fireplaces, 2½ to 4½ bathrooms, and a garage ranging in size from 228 to 550 square feet of building area. The comparables have sites ranging in size from 9,751 to 20,621 square feet of land area. The comparables have the same assessment neighborhood code as the subject property and are located from approximately .07 to .26 of a mile from the subject property. The sales occurred from July 2022 to November 2022 for prices ranging from \$724,000 to \$1,248,897 or from \$310.21 to \$400.54 per square foot of living area.

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 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.

The parties submitted information on seven comparable sales to support their respective positions. The Board gives less weight to appellants' comparables #1 and #2 as these properties sold in January and July 2021, respectively, not as proximate in time to the assessment date as the remaining sales in this record that sold from July to November 2022. Appellants' comparable sale #3 and the board of review comparables are improved with homes that are similar to the subject in age and most features, however, the homes differ from the subject dwelling in size. Appellants' comparable #1 and board of review comparables #1 and #4 are from 20% to 23% smaller than the subject dwelling and would require upward adjustments to

² Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be considered. 86 Ill.Admin.Code §1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2023.

make them more equivalent to the subject in size. Conversely, board of review comparables #2 and #3 are 12% and 28% larger than the subject dwelling, respectively, and would require downward adjustments to make them more equivalent to the subject property in size. These five comparables sold for prices ranging from \$724,000 to \$1,248,897 or from \$310.21 to \$400.54 per square foot of living area, including land. The subject's assessment reflects a market value of \$813,753 or \$292.93 per square foot of living area, including land, which is within the overall total price range but is below the range on a per square foot of living area basis as established by the best comparable sales in this record and is well supported after considering the suggested adjustments to these comparables. Based on this evidence the Board finds the subject's assessment is reflective of the property's fair cash value and 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: _____

November 19, 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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