



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

APPELLANT: Courtenay Ray
DOCKET NO.: 23-01749.001-R-1
PARCEL NO.: 16-36-415-001

The parties of record before the Property Tax Appeal Board are Courtenay Ray, the appellant, by attorney Kyle Gordon Kamego 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: \$69,389
IMPR.: \$149,749
TOTAL: \$219,138

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 stone exterior construction with 1,886 square feet of living area. The dwelling was constructed in 1939 and is approximately 84 years old. Features of the home include a basement with finished area, central air conditioning, two fireplaces and a 420 square foot garage. The property has an approximately 10,510 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable properties that have the same assessment neighborhood code as the subject and are located within .15 of a mile from the subject property. The comparables have sites that range in size from 9,520 to 20,620 square feet of land area. The comparables are improved with 2-story dwellings of brick or stone exterior construction ranging in size from 2,229 to 3,546 square feet of living area. The dwellings were built from 1938 to

1949. The comparables each have a basement with finished area, central air conditioning, one or two fireplaces and a garage ranging in size from 329 to 550 square feet of building area. The comparables sold from January 2021 to August 2022 for prices ranging from \$504,323 to \$1,100,000 or from \$203.52 to \$329.74 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$175,600, which would reflect a market value of \$526,853 or \$279.35 per square foot of 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 \$219,138. The subject's assessment reflects a market value of \$657,480 or \$348.61 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on four comparable properties that have the same assessment neighborhood code as the subject and are located within .40 of a mile from the subject property. The comparables have sites ranging in size from 8,126 to 17,603 square feet of land area. The comparables are improved with 1.75- story or 2-story dwellings of brick or wood siding exterior construction ranging in size from 1,752 to 2,144 square feet of living area. The dwellings are from 75 to 103 years old. The comparables each have a basement, three of which have finished area. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 220 to 420 square feet of building area. The comparables sold from May to November 2022 for prices ranging from \$635,000 to \$825,000 or from \$337.69 to \$413.81 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 parties submitted eight comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables #1, #2 and #3 due to their larger dwelling sizes, when compared to the subject and/or their sale dates occurred in 2021, less proximate to the January 1, 2023 assessment date than the comparable sales in the record. The Board has given reduced weight to board of review comparables #1 and #3 due to their lack of basement finish or older dwelling age, when compared to the subject.

¹ Procedural rule Sec. 1910.50(c)(1) 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 Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2023.

The Board finds the best evidence of market value to be the appellant's comparable #4 and board of review comparables #2 and #4, which had sale dates that occurred more proximate to the assessment date at issue. The Board finds these three comparables each have basement finish, like the subject and they are overall more similar to the subject in location, dwelling size, design, age and some features. The comparables sold from May to November 2022 for prices ranging from \$635,000 to \$735,000 or from \$329.74 to \$361.82 per square foot of living area, including land. The subject's assessment reflects a market value of \$657,480 or \$348.61 per square foot of living area, including land, which 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 from 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: _____

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

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

APPELLANT

Courtenay Ray, by attorney:
Kyle Gordon Kamego
Robert H. Rosenfeld & Associates, LLC
40 Skokie Blvd
Suite 150
Northbrook, IL 60062

COUNTY

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