



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

APPELLANT: Howard Feldman
DOCKET NO.: 23-02236.001-R-1
PARCEL NO.: 16-36-308-083

The parties of record before the Property Tax Appeal Board are Howard Feldman, 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 **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: \$59,573
IMPR.: \$257,703
TOTAL: \$317,276

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 brick and frame exterior construction with 3,133 square feet of living area. The dwelling was built in 2007, is approximately 16 years old, and has a reported effective age of 2008. The home was remodeled in 2016. Features of the home include a basement with finished area, central air conditioning, two fireplaces on one stack, and a 441 square foot garage. The property has an approximately 10,879 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted evidence disclosing the subject property was purchased on April 5, 2021 for a price of \$835,000. The appellant completed Section IV – Recent Sale Data disclosing the transaction was not between family members or related corporations, that the subject was sold by Doron Levy, and had been advertised in a Multiple Listing Service (MLS) for a period of 23 months

days using a realtor, Melanie Giglio of Compass. In further support of the appeal, the appellant submitted an unsigned copy of a PTAX-203 Real Estate Transfer Declaration, which reiterated the subject's sale price of \$835,000 and the closing date, as well as disclosing commissions being paid to one entity. 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 \$317,276. The subject's assessment reflects a market value of \$951,923 or \$303.84 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 three comparables located within 0.76 of a mile from the subject property, each of which has the subject's assessment neighborhood code. The comparables have sites that range in size from 12,063 to 13,229 square feet of land area. The comparables are improved with 2-story dwellings of brick exterior construction ranging in size from 3,043 to 3,663 square feet of living area. The homes range from 46 to 60 years old. Each comparable has a basement with finished area, central air conditioning, either one or two fireplaces, and a garage that ranges in size from 484 to 720 square feet of building area. The properties sold from May 2022 to December 2023 for prices ranging from \$935,000 to \$1,262,500 or from \$307.26 to \$344.66 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 appellant submitted evidence of an arm's length sale of the subject property and the board of review submitted four comparable sales for the Board's consideration. The Board gives little weight to the subject's sale which occurred in April 2021, less proximate in time to the January 1, 2023 assessment date at issue than the board of review's comparables and which are less likely to accurately reflect the market conditions at the time of the subject's assessment.

The Board finds the best evidence of market value in the record to be the board of review comparable sales which are more proximate in time to the assessment date at issue. The comparable properties are relatively similar to the subject in location, lot size, design, dwelling size, and most features. However, the board of review comparables are older homes than the

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.

subject. Nevertheless, these properties sold for prices ranging from \$935,000 to \$1,262,500 or from \$307.26 to \$344.66 per square foot of living area, land included. The subject's assessment reflects a market value of \$951,923 or \$303.84 per square foot of living area, land included, which falls below the range established by the comparable sales in this record. Based on this record and after considering adjustments to the comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported 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: _____

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

Howard Feldman, by attorney:
Robert Rosenfeld
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