



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

APPELLANT: Daniel Eirinberg
DOCKET NO.: 24-00414.001-R-1
PARCEL NO.: 16-36-402-006

The parties of record before the Property Tax Appeal Board are Daniel Eirinberg, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. in Chicago; 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: \$87,247
IMPR.: \$79,403
TOTAL: \$166,650

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 2024 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 10,125 square foot site improved with a 1-story, single family home with 2,428 square feet of living area that was built in 1951. The home features 3 baths, a full basement, central air conditioning, 1 fireplace, and a 1-car garage. The subject property 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 in January 2023 for a price of \$500,000 from Holly A. Shapiro. The appellant completed Section IV - Recent Sale Data of the appeal petition disclosing the parties to the transaction are related,¹ the property was sold by a

¹ Although Section IV of the appeal petition depicts the parties to the sale transaction to be related, the Illinois Real Estate Transfer Declaration (PTAX-203) form associated with the sale of the subject and submitted by the board of review did not disclose that the buyer and seller are related.

realtor, and the property was advertised for sale through the Multiple Listing Service since November 4, 2022. To document the sale, the appellant submitted a copy of the Settlement Statement associated with the sale of subject which disclosed that real estate commissions were paid to two entities. The appellant also submitted a copy of the Warranty Deed, an "Agreement" between the parties, Bill of Sale, and various ALTA disclosure statements associated with the sale of the subject property. 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 \$184,882. The subject's assessment reflects a market value of \$554,701 or \$228.46 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In support of its contention of the correct assessment, the board of review submitted a memorandum contending that for the 2023 tax year, the board of review lowered the subject's assessment to the purchase price. Then, for the 2024 tax year, the board of review added the Moraine Township 2024 equalization factor of 1.1094 that was added to each property in the Township so that the subject's current assessment is equal to the 2023 purchase price plus the addition of the 2024 equalization factor. The board of review also submitted the Multiple Listing Service (MLS) sheet associated with the sale of the subject depicting (among other data) the original listing price, the final sale price, and exposure time on the market. Lastly, the board of review submitted a copy of the Illinois Real Estate Transfer Declaration (PTAX-203) form and the property record card for the subject property. The board of review did not challenge the arm's-length nature of the subject's sale. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

On this record, the Board finds that the only evidence of market value as of the January 1, 2024 assessment date at issue was the subject's sale on January 3, 2023. The Board further finds that the subject's sale had all the elements of an arm's-length transaction which was not challenged by the board of review.

The Board finds the application of an equalization factor by the assessing officials or the board of review to be unpersuasive when determining the fair cash value and/or equitable assessment

² 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 2024.

for an individual property on appeal before the Board. The Board is cognizant of the fact that the appellant (taxpayer in this case) bears the burden of proving by a preponderance of the evidence that the application of the equalization factor resulted in overvaluation of the subject property as of the January 1, 2024 assessment date at issue. 86 Ill.Admin.Code §1910.63(e). Here, the record indicates that the addition of the 2024 Warren Township equalization factor of 1.1094 resulted in tax year 2024 assessment of \$184,882 which reflects a market value of \$554,701 which is greater than the subject's recent arm's-length sale price of \$500,000. Furthermore, the board of review did not present any evidence establishing that the subject's market value increased from January 2023 to January 2024. Consequently, based on the facts in this record, the Board finds that the appellant demonstrated by a preponderance of the evidence that the subject property is overvalued and, thus, a reduction in the subject's assessment is 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 25, 2025



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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