

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Zachary Rosenfeldt DOCKET NO.: 24-00445.001-R-1 PARCEL NO.: 15-29-103-003

The parties of record before the Property Tax Appeal Board are Zachary Rosenfeldt, the appellant, by attorney Arden Edelcup, of Tax Appeals Lake County in Lake Zurich; 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: \$35,440 **IMPR.:** \$130,103 **TOTAL:** \$165,543

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 split-level dwelling of frame exterior construction with 2,141 square feet of living area. The dwelling was constructed in 1974 and has an effective age of 1979. Features of the home include a basement, a lower-level, central air conditioning, two fireplaces and a garage with 484 square feet of building area. The property has a site with approximately 6,615 square feet of land area and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four suggested equity comparables located in the same assessment neighborhood code as the subject property. The comparables are improved with split-level dwellings of frame exterior construction that each contain 2,154 square feet of living area. The dwellings were built in 1975 and 1978. Each comparable has a basement, a lower-level, three with finished area, central air conditioning, a garage containing 484 square feet of building area and a combination of a patio, porch, deck and shed. Two comparables each have one fireplace. The comparables have improvement assessments that range from \$102,429

to \$119,437 or from \$47.55 to \$55.45 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$118,470 or \$55.33 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$165,543. The subject property has an improvement assessment of \$130,103 or \$60.77 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four suggested equity comparables located in the same assessment neighborhood as the subject property. The comparables are improved with split-level dwellings of frame exterior construction that range in size from 1,933 to 2,452 square feet of living area. The dwellings were built from 1975 to 1980. Three comparables each have a basement but each comparable has a finished area. The comparables each have central air conditioning, one fireplace, and a garage ranging in size from 400 to 484 square feet of building area. Comparable #2 has a shed. The comparables have improvement assessments ranging from \$130,356 to \$158,601 or from \$61.95 to \$74.60 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, counsel for the appellant submitted a grid analysis for the board of review comparables and a rebuttal for items not reported by the board of review. That the comparables have a combination of a porch, patio or a deck that range in size from 140 to 351 square feet of building area and the comparables have effective ages that range from 1977 to 1988.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 suggested comparables for the Board's consideration. The Board has given less weight to board of review comparable #3 due to its larger dwelling size when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables along with board of review comparables #1, #2 and #4. The Board finds that these comparables are most similar to the subject in location, design, dwelling size and some features. These most similar comparables have improvement assessments ranging from \$102,429 to \$158,601 or from \$47.55 to \$74.60 per square foot of living area. The subject's improvement assessment of \$130,103 or \$60.77 per square foot of living area, falls within the range established by the best comparables contained in the record. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the 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.

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Member	Member
Dan Dikini	Sarah Bokley
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:	September 16, 2025
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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 <u>PETITION AND EVIDENCE</u> 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

Zachary Rosenfeldt, by attorney: Arden Edelcup Tax Appeals Lake County 830 West IL Route 22 Suite 286 Lake Zurich, IL 60047

COUNTY

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