

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Heather Aldridge DOCKET NO.: 24-00551.001-R-1 PARCEL NO.: 12-18-307-010

The parties of record before the Property Tax Appeal Board are Heather Aldridge, 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: \$36,826 IMPR.: \$97,461 TOTAL: \$134,287

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 one-story dwelling of frame exterior construction with 1,438 square feet of living area. The dwelling was constructed in 1960. Features of the home include a full unfinished basement, 2 bathrooms, central air conditioning, and a 575 square foot garage. The property has a 16,225 square foot site and is located in Lake Bluff, Shields Township, Lake County.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located in the same neighborhood code as the subject and from .08 to .63 of a mile from the subject. Each comparable consists of a one-story dwelling of frame exterior

<sup>&</sup>lt;sup>1</sup> The board of review submitted a copy of the property characteristics sheet maintained by the township assessor for the subject.

construction. The homes were built from 1959 to 1961 and range in size from 1,434 to 1,590 square feet of living area. Each comparable has a partial unfinished basement ranging in size from 860 to 1,192 square feet of building area. Features include 1, 1½ or 2 bathrooms, and a garage ranging in size from 420 to 748 square feet of building area. Three homes each have central air conditioning and three comparables each have a fireplace. The comparables have improvement assessments ranging from \$73,178 to \$87,480 or from \$50.82 to \$55.02 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$84,280 or \$58.61 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 \$134,287. The subject property has an improvement assessment of \$97,461 or \$67.78 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables located in the same neighborhood code as the subject. Each comparable consists of a one-story dwelling of frame exterior construction. The homes were built from 1965 to 1976 and range in size from 1,392 to 1,456 square feet of living area. Each comparable has a full unfinished basement. Features include 1½ or 2 bathrooms, central air conditioning, and a garage ranging in size from 414 to 609 square feet of building area. The comparables have improvement assessments ranging from \$97,196 to \$104,952 or from \$66.76 to \$75.40 per square foot of living area.

Based on the foregoing, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant submitted additional information concerning board of review comparable #1 which also features a 195 square foot Solarium that was not reported and board of review comparable #2 has a condition rating of "good" whereas the subject has a condition rating of "average."

#### **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 a total of seven equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #2 which lacks air conditioning which is a feature of the subject and a feature of the other comparables in the record. The Board has given reduced weight to board of review comparable #1, based on its newer date of construction of 1976 and its Solarium amenity which

is not a feature of the subject and where the remaining comparables in the record are more similar to the subject in date of construction.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1, #3 and #4 along with board of review comparables #2 and #3, each of which are located in the subject's neighborhood, consist of homes that are one-story dwellings of frame exterior construction which are each similar in age to the subject dwelling. Two of the appellant's comparables necessitate upward adjustments to account for lesser bathroom count when compared to the subject and each of the appellant's best comparables necessitate upward adjustments for smaller basement sizes when compared to the subject. Additional adjustments are necessary for differences in condition grades, fireplace amenity and garage size when compared to the subject in order to make the comparables more equivalent to the subject. The best comparables have improvement assessments ranging from \$73,178 to \$104,952 or from \$50.82 to \$75.40 per square foot of living area. The subject's improvement assessment of \$97,461 or \$67.78 per square foot of living area falls within the range of the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of living area basis.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

Based on the foregoing and after considering appropriate adjustments to the best comparables in order to make them more equivalent to 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 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.

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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.

October 21, 2025
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Child Park Table 1

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**

Heather Aldridge, 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