



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Karen Stiefel  
DOCKET NO.: 24-01312.001-R-1  
PARCEL NO.: 16-05-204-026

The parties of record before the Property Tax Appeal Board are Karen Stiefel, the appellant, by attorney Andrew J. Rukavina, of The Tax Appeal Company in Mundelein; and the Lake County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds An Increase 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:** \$109,351  
**IMPR.:** \$465,591  
**TOTAL:** \$574,942

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 two-story dwelling of wood siding exterior construction with 3,914 square feet of living area. The dwelling was constructed in 1984 and has an effective age of 2002. Features of the home include a basement with finished area, central air conditioning, two fireplaces, and a 704 square foot garage. The property is located in Lake Forest, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on five comparable sales located in the subject's assessment neighborhood and within .24 of a mile of the subject. The comparables consist of two-story dwellings of brick exterior construction ranging in size from 3,243 to 4,702 square feet of living area. The homes were built from 1984 to 1988. Each dwelling has central air conditioning, two fireplaces, a full or partial basement with two having finished area, and a garage ranging in size

from 537 to 875 square feet of building area. The comparables sold from March 2022 to April 2024 for prices ranging from \$745,875 to \$1,410,000 or from \$177.84 to \$300.23 per square foot of living area, including land.<sup>1</sup> Based on this evidence, the appellant requested a reduced assessment of \$381,890, for an estimated market value of \$1,145,785 or \$292.74 per square foot of living area, including land, when applying 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 \$437,489. The subject's assessment reflects a market value of \$1,312,598 or \$335.36 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.<sup>2</sup>

In support of its contention of the correct assessment the board of review submitted a copy of the listing sheet associated with the subject's September 2022 sale for a price of \$1,725,000. The board of review also submitted a memorandum in which it argued that the subject's current assessment reflects a market value lower than the sale price and noted that the listing sheet mentions the subject having undergone extensive renovations. Based on this evidence, the board of review requested an increase in the subject's assessment reflective of the purchase price.

In rebuttal, the appellant argued that the subject's purchase occurred in the previous quadrennial and should not be considered as evidence of the subject's current value.

### **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 five comparables sales and the board of review submitted evidence of the subject's 2022 sale to support their respective positions before the Property Tax Appeal Board.

The Board finds the best evidence of market value to be the purchase of the subject property in September 2022 for a price of \$1,725,000, which was confirmed by the appellant. The board of review submitted a copy of the listing sheet disclosing the property was advertised for sale and had the elements of an arm's length transaction. Furthermore, four of the five comparables presented by the appellant sold from March to December 2022, undermining the appellant's argument that the subject's sale does not reflect the current market. The Board finds the purchase price is above the market value reflected by the assessment. The Board finds the appellant did not present any evidence to challenge the arm's length nature of the transaction or

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<sup>1</sup> The appellant reported that the subject sold in September 2022 for a price of \$1,725,000.

<sup>2</sup> 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 §1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

to refute the contention that the purchase price was reflective of market value. The Board gave less weight to the appellant's comparables #1 through #4, which differ from the subject in dwelling size and/or basement finish, and to comparable #5, which appears to be an outlier based on its much lower sale price compared to the other sales in the record. Based on this record the Board finds the subject's assessment is not reflective of market value and an increase in the subject's assessment is 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: \_\_\_\_\_

C E R T I F I C A T I O N

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:

January 20, 2026



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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 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**

KAREN STIEFEL, by attorney:  
Andrew J. Rukavina  
The Tax Appeal Company  
28643 North Sky Crest Drive  
Mundelein, IL 60060

**COUNTY**

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