



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

APPELLANT: CTLTC TTEE TR #8002385493
DOCKET NO.: 24-01631.001-R-1
PARCEL NO.: 16-25-201-006

The parties of record before the Property Tax Appeal Board are CTLTC TTEE TR #8002385493, the appellant, by attorney Lisa H. Fishbein, of Lisa H. Fishbein, Attorney at Law 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 **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: \$142,734
IMPR.: \$164,569
TOTAL: \$307,303

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 wood siding and stone exterior construction with 3,549 square feet of living area. The dwelling is 70 years old. Features of the home include a full basement, central air conditioning, two fireplaces, and a 441 square foot garage. The property has an approximately 18,974 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant's appeal is based on both unequal treatment in the assessment process as well as overvaluation concerning the subject property. In support of the inequity argument the appellant submitted information on eight equity comparables located within the subject's assessment neighborhood and within .97 of a mile of the subject. The comparables consist of one-story dwellings of wood siding, brick, brick and wood siding, stone and wood siding, or brick and stone exterior construction ranging in size from 3,079 to 3,852 square feet of living area. The

homes range in age from 63 to 73 years old. Each dwelling has central air conditioning, one or two fireplaces, and a garage ranging in size from 308 to 700 square feet of building area. One comparable has a concrete slab foundation and one comparable has a crawl-space foundation. The remaining six comparables each have basements, four of which have finished area. The comparables have improvement assessments ranging from \$106,452 to \$149,820 or from \$33.65 to \$40.27 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$164,569 or \$46.37 per square foot of living area.

In support of the market value argument, the appellant submitted an appraisal estimating the subject property had a market value of \$922,000 as of January 1, 2024. The appraisal was prepared by Charles Walsh. The purpose of the appraisal was to determine the market value of the subject property for an ad valorem tax appeal.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value by examining three comparable sales located within .68 of a mile of the subject. The comparables are improved with two-story or three-story dwellings ranging in size from 3,230 to 4,512 square feet of living area. The dwellings range from 60 to 118 years old. Each comparable has central air conditioning, one or two fireplaces, a full or partial basement with finished area, and a two-car garage. The parcels range in size from 13,129 to 21,009 square feet of land area. The sales occurred from July to December 2023 for prices ranging from \$900,000 to \$1,050,000 or from \$228.08 to \$301.86 per square foot of living area, including land. Adjustments were applied for differences between the comparables and the subject property for site size, age, dwelling size, bathroom count, basement finish, and other features to arrive at adjusted prices ranging from \$847,785 to \$961,926. Based on this data, the appraiser arrived at a market value of \$922,000 or \$259.79 per square foot of living area, including land, as of January 1, 2024. The appraiser reported that the subject sold in March 2021 for a price of \$1,238,170. The appraiser noted that “there were extenuating circumstances surrounding the 2021 sale,” altering the arm’s length nature of the sale, which the appraiser asserted led to the appellant paying more than fair market value for the property.

Based on this evidence, appellant requested the subject’s total assessment be reduced to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$340,882. The subject property has an improvement assessment of \$198,148 or \$55.83 per square foot of living area. The subject's total assessment reflects a market value of \$1,022,748 or \$288.18 per square foot of living area, including land, 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 four comparables located from .27 of a mile to 1.9 miles from the subject. The comparables consist of one-story or two-story dwellings of brick or wood siding exterior construction ranging

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

in size from 3,381 to 3,553 square feet of living area. The dwellings range in age from 60 to 100 years old. Each dwelling has central air conditioning, one or two fireplaces, and a garage ranging in size from 393 to 552 square feet of building area. Three comparables are each reported to have full basements with finished area. The parcels range in size from 16,301 to 23,953 square feet of land area. The comparables have improvement assessments ranging from \$107,321 to \$263,539 or from \$31.74 to \$74.17 per square foot of living area. The comparables sold from May 2023 to August 2024 for prices ranging from \$1,300,000 to \$2,000,000 or from \$373.56 to \$591.54 per square foot of living area, including land. The board of review also submitted a copy of the listing sheet associated with the subject's 2021 sale and noted that the subject enjoys a view of Lake Michigan, unlike each of the comparables in the appellant's appraisal, calling into question the appraisal's credibility. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant argued that the board of review comparables differ from the subject in location, age, and/or design. The appellant argued that board of review comparable #1 has private beach access unlike the subject and disputed the board of review's assertion that the subject has a lake view. In support, the appellant submitted photographs of the property and a copy of the Lake County property characteristic sheet showing a lack of a lake influence factor being applied to the subject.

Conclusion of Law

The taxpayer contends, in part, 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of 12 equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables #1 and #6, which differ from the subject in foundation. The Board also gives less weight to the comparables submitted by the board of review, which differ from the subject in age, location, and/or design.

The Board finds the best evidence of assessment equity to be appellant's remaining comparables, which are similar to the subject in age, location, dwelling size, and features. These comparables have improvement assessments ranging from \$106,452 to \$149,820 or from \$34.57 to \$40.27 per square foot of living area. The subject's improvement assessment of \$198,148 or \$55.83 per square foot of living area is above the range established by the best comparables in this record. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment commensurate with the appellant's request is justified.

The appellant also 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 appellant submitted an appraisal and the board of review submitted four comparable sales to support their respective positions before the Property Tax Appeal Board. The Board finds the subject's total assessment as reduced herein is reflective of the appraised value and therefore no further reduction in the subject's assessment is warranted given the reduction for equity considerations.

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

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:

February 17, 2026



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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