



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

APPELLANT: Linda Cohen
DOCKET NO.: 24-01670.001-R-1
PARCEL NO.: 15-36-100-013

The parties of record before the Property Tax Appeal Board are Linda Cohen, 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 **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: \$96,084
IMPR.: \$143,313
TOTAL: \$239,397

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 71,148 square foot site improved with a 1-story dwelling of brick exterior construction containing 2,852 square feet of living area. The dwelling was built in 1989 and is approximately 35 years old. Features of the home include a finished basement, central air conditioning, 1 fireplace, and a garage containing 912 square feet of building area. The property is located in Riverwoods, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a grid analysis with information on five comparable sales located from .31 of a mile to 1.18 miles from the subject and in the same assessment neighborhood code as the subject property. The comparables have sites ranging in size from 38,000 to 84,201 square feet of land area that are improved with 1-story dwellings of brick or frame exterior construction. The comparables range in size from 2,554 to 3,693 square feet of living area and were built from

1954 to 1966. Three comparables feature unfinished basements and two comparables have undisclosed foundations. Each comparable has central air conditioning, 1 fireplace, and a garage ranging in size from 465 to 648 square feet of building area. The comparables sold from May 2023 to July 2024 for prices ranging from \$549,000 to \$730,000 or from \$197.67 to \$232.22 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's total assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$239,397. The subject's assessment reflects a market value of \$718,263 or \$251.85 per square foot of living area, land included, 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 a grid analysis with information on three comparable sales located from .61 of a mile to 1.2 miles from the subject and in the same assessment neighborhood code as the subject property. The board of review comparable sale #1 is the same property as appellant's sale #4. The comparables have parcels ranging in size from 54,450 to 84,201 square feet of land area that are improved with 1-story dwellings of frame or brick construction and ranging in size from 2,163 to 3,122 square feet of living area. The dwellings were built from 1954 to 1966. Each dwelling features a basement, one of which has finished area. Each home has central air conditioning, 1 or 3 fireplaces, and a garage ranging in size from 462 to 888 square feet of building area. Comparable #1 also has a wood farm building. The comparables sold from May to September 2023 for prices ranging from \$725,000 to \$873,000 or from \$232.22 to \$363.09 per square foot of living area, including land.

In rebuttal, the appellant's counsel critiqued the board of review comparable sales. Specifically, as to comparable #1, counsel noted that this comparable has a pool and a hot tub, along with other amenities and "carries over \$42,000 in additional land value compared to the subject." As to comparable #2, counsel contended that this is a fully restored and updated designer residence featured in known publications. With respect to comparable #3, counsel cites the Multiple Listing Service (MLS) sheet associated with the sale of this property noting that this also is a fully renovated upscale residence with updated technology and amenities unlike the subject property. Counsel contended that the board of review did not refute the appellant's evidence.

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.

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 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.

Initially, with respect to the appellant's rebuttal argument, the Board finds that although counsel expressly cites Multiple Listing Service sheets, he did not submit the MLS listings associated with the sales to support his argument. Furthermore, while counsel highlighted superior features of the board of review comparables such as larger land area with regard to comparable #1, he ignored the smaller sites of comparables #2 and #3 relative to the subject property. Additionally, while counsel cited renovations and/or upgrades, he did not address the inferior features of the board of review comparables such as older ages, smaller dwelling sizes (#2 & #3), unfinished basements (#1 & #2) and smaller garages in comparison to the subject dwelling. Consequently, the Board finds the appellant's argument in rebuttal unsupported and unpersuasive.

The parties submitted a total of seven comparable sales including one common comparable for the Board's consideration. After analyzing the evidence submitted, the Board gave less weight to appellant's comparables #2 and #3 based on their lack of a basement foundation unlike the subject which has a finished basement. Additionally, appellant's comparable #3 is approximately 29% larger in dwelling size relative to the subject dwelling. The Board also gave reduced weight to appellant's comparable #1 due to appearing to be an outlier based on its low sale price when compared to the remaining sales in this record. Finally, the Board gave less weight to board of review comparable #3 which is approximately 24% smaller in dwelling size relative to the subject.

The Board finds the best evidence of market value to be the appellant's comparable #5, the board of review comparable #2, and the parties' common comparable as these three properties are most similar overall to the subject in key characteristics such as design, dwelling size, foundation, and amenities. However, all these comparables lack a basement finish, dissimilar to the subject's finished basement, thus requiring upward adjustments to these comparables in overall price and/or price per square foot of living area in order to make them more equivalent to the subject.

The best comparables in this record sold in May and August 2023 for prices ranging from \$605,000 to \$873,237 or from \$222.92 to \$363.09 per square foot of living area, including land. The subject's assessment reflects a market value of \$718,263 or \$251.85 per square foot of living area, including land, which falls well within the range established by the best comparable sales in this record both in terms of overall value and on a price per square foot of living area basis.

Based on this record and after considering all the comparables submitted by the parties with emphasis on those properties that are most similar in characteristics to the subject, and after considering adjustments to the best comparables in this record for differences from the subject, the Board finds that the appellant did not establish by a preponderance of the evidence that the subject property is overvalued. Therefore, the Board finds that 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.



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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