



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

APPELLANT: Louis Groebner  
DOCKET NO.: 24-02438.001-C-2  
PARCEL NO.: 16-16-102-006

The parties of record before the Property Tax Appeal Board are Louis Groebner, the appellant, by attorney Hannah Rosenfeld, of Robert H. Rosenfeld & Associates, LLC, 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:** \$123,810  
**IMPR.:** \$222,822  
**TOTAL:** \$346,632

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 commercial building of masonry exterior construction containing 11,680 square feet of gross building area. The property is currently operated as an automobile sales and service facility. The building was constructed in 1980 with a reported effective age of 40 years old in fair condition. The structure is divided into a showroom, offices, and a service garage. The property has a 37,620 square foot site resulting in a land-to-building ratio of 3.22:1. The property is located in Highland Park, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an approximately 80-page appraisal prepared by Elizabeth Halemba and Susan Z. Ulman, both of whom are Certified General Real Estate Appraisers. Ulman also has the MAI designation. Using both the sales and income approaches to value using fee simple

property rights, the appraisers estimated the subject property had a market value of \$1,040,000 as of January 1, 2024 for the purpose of arriving at an equitable assessed valuation for purposes of real estate taxation.

At the time of valuation, the property was fully owner-occupied. (Appraisal, p. 6). Inspection of the subject property last occurred on September 23, 2024. As detailed on page 31, the roof was replaced in 2020, but a 2023 hailstorm damaged the roof, glass block windows, and one of two roof mounted HVAC units making it inoperable. As a consequence of the hailstorm, roof leaks damaged ceiling tiles as well as corroded the metal ceiling deck at the rear of the building. According to the appraisal coordinator of Premier Claims, LLC, the total damage estimate is \$311,840.89.

Under the income approach to value, the appraisers analyzed nine retail rentals located in Highland Park. These rentals range in size from 1,058 to 3,730 square feet of building area and develop a range of effective rental rates from \$8.00 to \$11.24 per square foot on varying terms of net or gross. On page 44, the appraisers acknowledged that lease information for auto dealership facilities is rare and lease details are typically closely held, with most properties being owner-occupied. After analyzing and adjusting the rental data, the appraisers estimated the subject property would have a net rental rate of \$9.50 per square foot of building area resulting in a potential gross income of \$110,960. Vacancy and collection loss was estimated to be 7% or \$7,767 resulting in an effective gross income of \$103,193. The appraisers then estimated expenses to be \$18,888 resulting in a net operating income of \$84,305. Next, the appraisers applied a loaded capitalization rate of 8.20% in order to estimate the subject's market value as \$1,030,000, rounded, using the income approach (Appraisal, p. 33-50).

Appraisal pages 51 to 72 set forth the sales comparison approach. On pages 52-53, a sale of an auto dealership in Gurnee is depicted as comparable #1 and on pages 54-55, a sale of an auto dealership in Waukegan is depicted as comparable #1. Having examined the report and particularly pages 68 and 69, the Board has determined that only the Waukegan “comparable #1” was utilized by the appraisers in this approach.

The appraisers analyzed data on seven comparable sales of auto dealerships, five of which are located in Lake County and two of which are located in Cook County. The comparable parcels range in size from 54,537 to 283,737 square feet of land area. The comparables are improved with one-story buildings built between 1955 and 1999, with the newest one having been renovated in 2011. These buildings present actual ages ranging from 25 to 69 years old. The buildings range in size from 13,884 to 39,284 square feet of gross building area. The properties present land-to-building ratios ranging from 2.54:1 to 12.93:1. The properties sold from May 2020 to April 2024 for prices ranging from \$682,500 to \$4,000,000 or from \$26.81 to \$113.44 per square foot of gross building area, including land. Next, the appraisers made qualitative adjustments to the comparable sales for differences in location, age, size, land-to-building ratio, functional utility and/or condition when compared to the subject. No adjustments were necessary for property rights conveyed, financing or for conditions of sale as each was reported to be an arm's-length sale transaction. After determining overall upward adjustments to five comparables and downward adjustments to two comparables, the appraisers concluded a unit value for the subject of \$90.00 per square foot or \$1,050,000, rounded, using the sales comparison approach to value.

In reconciliation of the two approaches to value, the appraisers gave greatest weight to the sales comparison approach in the final estimate of value. Based on the foregoing appraisal evidence, the appellant requested a total assessment reflective of the appraised value conclusion at 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 \$501,123. The subject's assessment reflects a market value of \$1,503,519 or \$128.73 per square foot of gross building area, land included, when using the statutory level of assessment of 33.32%.<sup>1</sup>

In partial response to the appraisal evidence, the board of review submitted a memorandum.<sup>2</sup> The board of review summarily asserts that the sales in the appraisal are either vacant or "extreme dating of comparables." The memorandum states that appraisal sales #1, #2, #3 and #7 "were vacant at the time of sale and were asset disposition sales and most had deferred maintenance" and appraisal sales #4, #5 and #6 "were located in inferior market locations." No supporting data was supplied for these assertions. The board of review also asserts that more recent sales located in competing market areas should have been considered.

In support of its contention of the correct assessment, the board of review submitted a two-page grid analysis of nine suggested comparable sales five of which are located in Lake County and four of which are located in Cook County with supporting CoStar printouts for each property. Board of review sale #3 depicts a March 2021 sale for \$6,100,000<sup>3</sup> and sale #8 depicts an August 2021 sale of the same property for \$11,643,000 both of which were occupied by Tesla, as was sale #4.

The comparable parcels range in size from 29,445 to 172,193 square feet of land area which have been improved with one-story masonry buildings ranging in size from 9,472 to 33,539 square feet of gross building area. No date of construction was provided for comparable #7; the remaining buildings range in age from 7 to 75 years old, based on the dates of construction set forth in the CoStar sheets. Eight properties sold between January 2021 and June 2022 with comparable #9 noted as "pending" after having been on the market for 1,754 days for prices ranging from \$2,000,000 to \$11,643,000 or from \$114.61 to \$466.97 per square foot of gross building area, including land. The CoStar sheets depict each property as 100% leased at the time of sale with a comment on comparable #4:

The buyer was motivated to acquire the asset by the quality of the tenant, the recent renovation of the facility, and because no early termination or purchase options are available to Tesla.

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<sup>1</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 Sec. 1910.50(c)(1). Prior to the issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2024.

<sup>2</sup> The memorandum falsely asserted the appraised value was as of January 1, 2023 and falsely asserted that the appraisers had analyzed only six comparable sales.

<sup>3</sup> The CoStar data sheet reports the sale price of \$6,100,000 with an asking price of \$6,400,000 with 217 days on the market.

Four of the comparable properties are single tenant, two comparables were described as having two tenants, and comparable #1 was described as having four tenants.

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

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant submitted an appraisal of the subject property with an opinion of value as of the lien date at issue and the board of review submitted eight suggested comparable sales, one of which was “pending,” to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the comparable sales presented by the board of review, each of which were 100% leased at the time of sale, indicating that the buyer was likely interested in the cash flow to be generated by the property as was noted with the Tesla tenant in one of the properties. Moreover, there are no adjustments to these comparables for differences in location, lot size, age and/or building size when compared to the subject. In summary, the Board finds, without substantial adjustments to the raw sales data presented by the board of review, these suggested comparable sales do not present an adequate set of comparable data for comparison to the subject property as to fee simple market value in order to support the subject's current estimated market value of \$1,503,519 or \$128.73 per square foot of gross building area, including land.

In contrast, the Board finds the appraisers presented a reasoned report and relied primarily upon the sales comparison approach involving auto dealerships, the majority located in Lake County, along with applying upward adjustments to each comparable for location and applying downward adjustments for functional utility/condition differences in comparison to the subject. The appraisers described the subject to be in fair condition with various damages caused by a 2023 hailstorm. While the sales in the appraisal have a wide range of sales dates, the Board further finds the most recent sale occurred in April 2024 (sale #7) of a property in Lake County for \$101.82 per square foot which appears to support the value conclusion of the appraisers for the subject at \$90.00 per square foot.

The Board finds the best evidence of market value as of January 1, 2024 is the appellant's appraisal report with an estimated market value of \$1,050,000. In contrast, the subject's assessment reflects a market value of \$1,503,519 or \$128.73 per square foot of gross building area, including land, which is above the appraised value conclusion. Therefore, the Board finds the subject property is overvalued based upon its assessment and a reduction in the subject's assessment commensurate with the appellant's request 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: \_\_\_\_\_

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: \_\_\_\_\_

December 23, 2025



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

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