



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

APPELLANT: Peter Mordini
DOCKET NO.: 21-00463.001-R-1
PARCEL NO.: 16-23-307-004

The parties of record before the Property Tax Appeal Board are Peter Mordini, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Chicago; 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: \$47,710
IMPR.: \$57,758
TOTAL: \$105,468

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 2021 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 1-story dwelling of brick exterior construction with 1,359 square feet of living area. The dwelling was constructed in 1950 and is approximately 71 years old. Features of the home include a basement with finished area, central air conditioning, a fireplace and a garage containing 528 square feet of building area. The property has an 8,293 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four suggested equity comparables that are in the same assessment neighborhood code as the subject and located within 0.58 of a mile from the subject property. The comparables are improved with 1-story dwellings of brick exterior construction ranging in size from 1,050 to 1,383 square feet of living area that are from 81 to 98 years old. Each comparable has an unfinished basement, a fireplace and a garage ranging in size from 216 to 528 square feet of building area. Two comparables each have central air conditioning. The comparables have improvement assessments ranging from \$30,345 to \$50,332 or

from \$28.90 to \$37.45 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$46,715 or \$34.37 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 \$105,468. The subject property has an improvement assessment of \$57,758 or \$42.50 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted two copies of the subject property record card and no supporting evidence for the record.

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 record contains only four suggested comparables for the Board's consideration. The Board gives less weight to the appellant's comparable #3 for its significantly smaller dwelling size when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1, #2 and #4, which are most similar to the subject in location, dwelling size and some features. However, the Board finds the comparables are older in age and lack a finished basement when compared to the subject, furthermore, two comparables lack central air conditioning and two comparables have smaller garages when compared to the subject, suggesting upward adjustments would be required to make the comparables more equivalent to subject. Nevertheless, these three similar comparables have improvement assessments ranging from \$48,804 to \$50,332 or from \$35.29 to \$37.45 per square foot of living area. The subject property has an improvement assessment of \$57,758 or \$42.50 per square foot of living area, which falls above the range established by the best comparables in this record. The subject property's higher improvement assessment value appears to be justified given its newer age, finished basement and larger garage when compared to the comparables. After considering the economics of scale and adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement assessment was inequitably assessed and a reduction in the 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



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:

September 19, 2023



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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