



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

APPELLANT: Stefan Rosuck  
DOCKET NO.: 21-00546.001-R-1  
PARCEL NO.: 07-18-403-031

The parties of record before the Property Tax Appeal Board are Stefan Rosuck, 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:** \$25,155  
**IMPR.:** \$133,733  
**TOTAL:** \$158,888

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 is reported to be a one-story dwelling of wood siding exterior construction with 3,072 square feet of above ground living area. The dwelling was constructed in 1994 and is approximately 27 years old. Features of the home include a lower level with finished area, a basement with finished area, central air conditioning, a fireplace, and a 660 square foot garage. The property has an approximately 14,370 square foot site and is located in Gurnee, Warren Township, Lake County.

The appellant contends assessment inequity with respect to the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables with the same assessment neighborhood code as the subject property and located within .30 of a mile from the subject. The comparables are described as one-story dwellings of wood siding exterior construction ranging in size from 3,135 to 3,569 square feet of above ground living area. The dwellings are 26 or 27 years old. Two comparables are reported to have basements/lower levels

with finished area and one comparable has an unfinished basement. Each comparable has central air conditioning, a fireplace and a garage ranging in size from 636 to 792 square feet of building area. The comparables have improvement assessments ranging from \$128,726 to \$152,429 or from \$41.06 to \$42.71 per square foot of above ground living area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$158,888. The subject property has an improvement assessment of \$133,733 or \$43.53 per square foot of above ground living area.

In support of its contention of the correct assessment the board of review submitted information on five equity comparables with the same assessment neighborhood code as the subject property and located within .35 of a mile from the subject. Comparables #1, #2 and #3 are identical to appellant's comparables #2, #3 and #1, respectively. The comparables are reported to be one-story homes of wood siding or brick exterior construction ranging in size from 2,562 to 3,569 square feet of above ground living area. The dwellings were built from 1994 to 1998. Comparable #2 has a reported effective year built of 2002. The comparables are reported to have basements, one of which has finished area. Two comparables have lower levels with finished area. Each comparable has central air conditioning, one fireplace and a garage ranging in size from 594 to 792 square feet of building area. The comparables have improvement assessments ranging from \$116,524 to \$152,429 or from \$41.06 to \$47.88 per square foot of above ground living area. Based on this evidence the board of review requested confirmation of the subject's improvement assessment.

### **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 a total of five equity comparables for the Board's consideration, three of which are common to both parties. The Board finds these comparables have varying degrees of similarity to the subject in location, age, dwelling size and features. The comparables have improvement assessments ranging from \$116,524 to \$152,429 or from \$41.06 to \$47.88 per square foot of above ground living area. The subject's improvement assessment of \$133,733 or \$43.53 per square foot of above ground living area falls within the range established by the comparables in this record. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's assessment is supported. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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



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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