



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

APPELLANT: Michael Walsh
DOCKET NO.: 21-00604.001-R-1
PARCEL NO.: 12-18-400-047

The parties of record before the Property Tax Appeal Board are Michael Walsh, 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: \$34,399
IMPR.: \$128,530
TOTAL: \$162,929

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 1.5-story dwelling of brick exterior construction containing 2,794 square feet of living area. The dwelling was built in 1958 and is approximately 63 years old. Features of the property include a basement with finished area, central air conditioning, one fireplace and a garage with 594 square feet of building area. The property has a site with approximately 23,086 square feet of land area in Lake Bluff, Shields 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 equity comparables located within .42 of a mile from the subject property and have the same assessment neighborhood code as the subject property. The comparables are improved with 1-story, 1.5-story or 2-story dwellings that range in size from 2,210 to 2,448 square feet of living area. The dwellings range in age from 52 to 89 years old. The comparables each have basement with two

having finished area. Three comparables have central air conditioning; three comparables each have one fireplace; and each comparable has a garage ranging in size from 456 to 948 square feet of building area. The comparables have improvement assessments that range from \$81,548 to \$101,683 or from \$36.89 to \$41.98 per square foot of 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 \$162,929. The subject property has an improvement assessment of \$128,530 or \$46.00 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables located within .41 of a mile from the subject property and have the same assessment neighborhood code as the subject property. The comparables are improved with 1.5-story dwellings of stucco, wood siding, or brick and vinyl siding exterior construction that range in size from 2,430 to 2,746 square feet of living area. The comparables were built from 1953 to 1956 with effective years built of 1975 or 1979. The comparables have basements with two having finished area. Each comparable has central air conditioning and a garage ranging in size from 400 to 753 square feet of building area. Two comparables each have one fireplace. The comparables have improvement assessments ranging from \$103,185 to \$146,379 or from \$42.46 to \$59.41 per square foot of living area.

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 parties submitted information on seven comparables to support their respective positions. The Board gives less weight to appellant's comparables #1, #2 and #4 which are less similar in dwelling size and/or lack central air conditioning when compared to the subject.

The Board finds the best evidence of assessment equity to be appellant's comparable #3 and the board of review comparables which have varying degrees of similarity to the subject in location, age, dwelling size, and some features. These comparables have improvement assessments that range from \$101,683 to \$146,379 or from \$41.54 to \$59.41 per square foot of living area. The subject's improvement assessment of \$128,530 or \$46.00 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering the adjustments to the best comparables for differences from the subject property, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed. The Board finds the assessment of the subject property as established by the board of review is correct 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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