



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

APPELLANT: Kavita Cardozo
DOCKET NO.: 21-01959.001-R-1
PARCEL NO.: 16-34-202-037

The parties of record before the Property Tax Appeal Board are Kavita Cardozo, 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: \$44,666
IMPR.: \$90,565
TOTAL: \$135,231

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 split-level dwelling of brick exterior construction with 2,177 square feet of living area. The dwelling was built in 1974 and is approximately 47 years old. Features of the home include a partial unfinished basement and a crawl space foundation, central air conditioning, and a 506 square foot garage.¹ The property has an approximately 8,750 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 equity comparables with the same assessment neighborhood code as the subject property and located

¹ Property characteristics for the subject not disclosed by the appellant were found in the evidence presented by the board of review including the property record card and schematic drawing, which was not refuted by the appellant in written rebuttal.

within 0.29 of a mile from the subject. The comparables are improved with split-level or tri-level dwellings of brick exterior construction that range in size from 1,989 to 2,446 square feet of living area. The dwellings range in age from 60 to 66 years old. The appellant reported that one comparable has a lower level with finished area and three comparables each have a crawl space or concrete slab foundation. Each comparable has central air conditioning. Two comparables each have one fireplace. Three comparables each have a garage ranging in size from 264 to 588 square feet of building area and one comparable was reported to have "None/588" for its garage amenity. The comparables have improvement assessments ranging from \$71,209 to \$87,289 or from \$35.28 to \$35.80 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$77,446 or \$35.57 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 \$135,231. The subject property has an improvement assessment of \$90,565 or \$41.60 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on five comparable properties with the same assessment neighborhood code as the subject property and located within 0.29 of a mile from the subject. The comparables are improved with split-level dwellings of brick, brick and wood siding, or brick and aluminum siding exterior construction that range in size from 1,837 to 2,241 square feet of living area. The dwellings were built from 1963 to 1972 and thus range in age from 49 to 58 years old. Comparables #1, #4, and #5 have effective years built of 1985, 1971, and 1982, respectively. The board of review reports that each comparable has a basement with four having finished area and with four of these comparables also having a crawl space foundation. Each comparable has central air conditioning and a garage ranging in size from 338 to 506 square feet of building area. The comparables have improvement assessments ranging from \$82,049 to \$90,827 or from \$40.53 to \$47.32 per square foot of living area. Based on this evidence the board of review requested confirmation of the subject's 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 parties submitted a total of nine equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables which are less similar in age than the other comparables in this record.

The Board finds the best evidence of assessment equity to be the board of review comparables which are similar to the subject in location, design, age, dwelling size, and most features, except

four comparables have basement finish, not a feature of the subject. Nevertheless, the best comparables have improvement assessments ranging from \$82,049 to \$90,827 or from \$40.53 to \$47.32 per square foot of living area. The subject's improvement assessment of \$90,565 or \$41.60 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 adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is not justified and a reduction in the subject's assessment is warranted.

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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