



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

APPELLANT: Kwang Sun & Hyo Sun Ahn  
DOCKET NO.: 15-02279.001-R-1  
PARCEL NO.: 15-20-408-029

The parties of record before the Property Tax Appeal Board are Kwang Sun & Hyo Sun Ahn, the appellants, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and 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:** \$45,150  
**IMPR.:** \$148,793  
**TOTAL:** \$193,943

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 2015 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 two-story dwelling of frame construction with 3,537 square feet of living area. The dwelling was constructed in 1990. Features of the home include a partial unfinished basement, central air conditioning, a fireplace and an attached 692 square foot garage. The property has a 15,725 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellants' appeal is based on overvaluation. In support of this argument, the appellants submitted information on three comparable sales, two of which were located in the same neighborhood as the subject property. The comparable properties have from 13,107 to 16,160 square feet of land area. The properties are improved with two-story dwellings of frame construction. The dwellings were constructed in 1989 or 1990. The comparables had varying degrees of similarity when compared to the subject. The dwellings contain 3,250 or 3,329 square feet of living area. The comparables sold in January or May 2013 for prices that ranged from

\$450,000 to \$525,000 or from \$135.18 to \$157.71 per square foot of living area, land included. Based on this evidence, the appellants requested a reduction in the subject's total assessment to \$171,336.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's total assessment of \$193,943 was disclosed. The subject's assessment reflects a market value of \$584,518 or \$165.26 per square foot of living area, including land, when applying the 2015 three-year average median level of assessment for Lake County of 33.18% as determined by the Illinois Department of Revenue.

The board of review presented information on four comparable sales located in the same neighborhood as the subject property. The comparables have from 15,464 to 23,261 square feet of land area. The comparables are improved with two-story dwellings of frame construction. The dwellings were constructed from 1989 to 1992. The comparables had varying degrees of similarity when compared to the subject. The dwellings ranged in size from 3,117 to 3,468 square feet of living area. The comparables sold from June 2014 to July 2015 for prices ranging from \$570,000 to \$650,000 or from \$171.57 to \$192.49 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

The appellants' attorney submitted a rebuttal brief.

### **Conclusion of Law**

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties presented sale prices for seven comparable properties. The Board gave less weight to the comparables submitted by the appellants. These properties sold in 2013 and were considered to be dated in relation to the January 1, 2015 assessment date. The Board also gave less weight to board of review comparables #1, #2 and #4. These properties had basements with finished area that were dissimilar from the subject's partial unfinished basement. The Board finds the best evidence of market value in the record to be board of review comparable #3. This property sold proximate to the assessment date; was very similar to the subject in all characteristics; and was the only property in the record to have an unfinished basement like the subject. Board of review comparable #3 sold in July 2015 for a price of \$570,000 or for \$181.01 per square foot of living area, including land. The subject's assessment reflects a market value of \$584,518 or \$165.26 per square foot of living area, including land, which is below the market value on a per square foot basis of the best comparable sale in this record. The Board finds the subject's higher market value of \$584,518 is justified due to the subject having more living area than board of review comparable #3. Based on this record, the Board finds the appellants were not able to demonstrate that the subject was overvalued and a reduction in the subject's assessment is not justified.



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 the subsequent year 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.

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.