



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

APPELLANT: Wilson So
DOCKET NO.: 17-01594.001-R-1
PARCEL NO.: 07-18-208-035

The parties of record before the Property Tax Appeal Board are Wilson So, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Lake Forest; 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: \$21,584
IMPR.: \$74,406
TOTAL: \$95,990

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 2017 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 wood siding construction with 2,081 square feet of living area. The dwelling was constructed in 1994. Features of the home include a full basement with finished area, central air conditioning, a fireplace and a 441 square foot two-car garage. The property has a 10,454 square foot site and is located in Gurnee, Warren Township, Lake County.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on twelve comparable sales located within same neighborhood as the subject and within .31 of a mile of the subject property. The comparables have sites ranging in size from 7,405 to 12,632 square feet of land area and are improved with two-story dwellings of wood siding exterior construction that were built in 1994 or 1995. The dwellings range in size from 1,800 to 2,244

square feet of living area. Each comparable has a basement, with four having finished area; central air conditioning and a two-car or a three-car garage ranging in size from 420 to 704 square feet of building area. Nine comparables each have one or two fireplaces. The comparables sold from April 2016 to May 2017 for prices ranging from \$232,500 to \$289,000 or from \$116.76 to \$136.51 per square foot of living area, including land. The appellant also submitted a Multiple Listing Service (MLS) sheet associated with the sale of comparable #12 which indicated the dwelling has finished basement area and sold in May 2017 for \$289,000. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$95,990. The subject's assessment reflects an estimated market value of \$289,563 or \$139.15 per square foot of living area, including land, when applying the 2017 three-year average median level of assessment for Lake County of 33.15%.

In support of the subject's assessment, the board of review submitted information on four comparable sales located within same subdivision and within .29 of a mile of the subject.¹ The comparables have sites ranging in size from 8,276 to 12,632 square feet of land area and are improved with two-story dwellings of wood siding exterior construction that were built in 1994 or 1995. The dwellings have either 2,117 or 2,367 square feet of living area. The comparables each have a basement with finished area, central air conditioning and a two-car or a three-car garage ranging in size from 480 to 682 square feet of building area. Three comparables each have a fireplace. The comparables sold from March to May 2017 for prices ranging from \$289,000 to \$314,000 or from \$132.66 to \$143.84 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends 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 appellant did not meet this burden of proof and no reduction in the subject's assessment is warranted.

The parties submitted 15 comparable sales for the Board's consideration, with one comparable common to both parties. The Board gave less weight to the appellant's comparables #1, #2 and #4 through #11 along with the board of review comparables #2 and #3 as these sales have dissimilar dwelling sizes, inferior unfinished basements and/or larger three-car garages when compared to the subject.

The Board finds the best evidence of the subject's market value to be the parties' common comparable, appellant's comparable #3 and board of review comparable #1. These comparables are more similar to the subject in location, dwelling size, design, age and features. The three

¹ Board of review comparable #4 is the same as appellant's comparable #12. The Board finds the parties differ as to the sale price and whether this property has finished basement area. The Board finds the best evidence of the sale price and finished basement area was the MLS sheet provided by the appellant.

comparables sold in March and May 2017 for prices of \$265,000 and \$289,000 or for \$125.65 and \$136.51 per square foot of living area, including land. The subject's assessment reflects an estimated market value of \$289,563 or \$139.15 per square foot of living area, including land, which falls slightly above the range established by the best comparables in the record. However, after considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. Based on this record the Board finds the appellant failed to prove by a preponderance of the evidence that the subject was overvalued. Therefore, 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: May 26, 2020



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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