

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:	Jing Ji
DOCKET NO.:	17-02525.001-R-1
PARCEL NO .:	15-21-209-001

The parties of record before the Property Tax Appeal Board are Jing Ji, 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 <u>no change</u> 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:	\$43,097
IMPR.:	\$134,360
TOTAL:	\$177,457

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 exterior construction with 2,633 square feet of living area. The dwelling was constructed in 1996. Features of the home include a full basement with 921 square feet of finished area, central air conditioning and an attached 736 square foot garage. The property has a 13,504 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales located within .48 of a mile from the subject and which share the same neighborhood code assigned by the assessor as the subject property. The comparables consist of two-story dwellings of wood siding exterior construction that contain either 2,843 or 3,414 square feet of living area. The dwellings were constructed in either 1997 or 1998. Each comparable has a basement with finished area, central air

conditioning and a garage of either 693 or 736 square feet of building area. The comparables have sites ranging in size from 10,890 to 12,632 square feet of land area. The comparables sold in June or October 2016 for prices ranging from \$553,000 to \$590,000 or from \$169.89 to \$194.51 per square foot of living area, including land.

Based on this evidence, the appellant requested an assessment reduction to \$166,740 which would reflect a market value of \$500,270 or \$190.00 per square foot of living area, including land, at the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$177,457. The subject's assessment reflects a market value of \$535,315 or \$203.31 per square foot of living area, land included, when using the 2017 three year average median level of assessment for Lake County of 33.15% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located within .469 of a mile from the subject. Three of the comparables share the same neighborhood code assigned by the assessor as the subject. The comparables consist of two-story dwellings of brick or wood siding exterior construction. The homes were built between 1994 and 1998 and range in size from 2,621 to 2,988 square feet of living area. Each home has a basement with finished area, central air conditioning, a fireplace and a garage ranging in size from 483 to 736 square feet of building area. The comparables sold from August 2017 to March 2018 for prices ranging from \$510,000 to \$670,000 or from \$191.59 to \$224.23 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 a reduction in the subject's assessment is not warranted.

The parties submitted a total of seven comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1 and #2 which are each substantially larger than the subject dwelling. Reduced weight has been given to board of review comparable #1 as the sale price appears to be an outlier given the sales of other similar properties in the record. The Board has given reduced weight to board of review comparable #4 as the sale date in March 2018 is substantially after the valuation date at issue and thus less likely to be indicative of the subject's estimated market value as of the assessment date of January 1, 2017.

The Board finds the best evidence of market value to be appellant's comparable sale #3 and board of review comparable sales #2 and #3. The comparables are each similar to the subject in

location, age, size and most features. These most similar comparables sold between June 2016 and December 2017 for prices ranging from \$525,000 to \$590,000 or from \$194.51 to \$206.22 per square foot of living area, including land. The subject's assessment reflects a market value of \$535,315 or \$203.31 per square foot of living area, including land, which is within the range established by the best comparable sales in this record both in terms of overall value and on a per-square-foot basis. Based on this evidence, the Board finds the subject's estimated market value as reflected by its assessment is supported and a reduction in the subject's assessment is not 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.

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	Chairman
CLR	hover Stoffen
Member	Member
Dan Dikinia	Sarah Bokley
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:

June 16, 2020

Mano Morios

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 <u>PETITION AND</u> <u>EVIDENCE</u> 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

State of Illinois Property Tax Appeal Board William G. Stratton Building, Room 402 401 South Spring Street Springfield, IL 62706-4001

## APPELLANT

Jing Ji, by attorney: Ronald Kingsley Lake County Real Estate Tax Appeal, LLC 13975 W. Polo Trail Drive #201 Lake Forest, IL 60045

## COUNTY

Lake County Board of Review Lake County Courthouse 18 North County Street, 7th Floor Waukegan, IL 60085