



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

APPELLANT: Tai Shin
DOCKET NO.: 17-02668.001-R-2
PARCEL NO.: 16-05-409-001

The parties of record before the Property Tax Appeal Board are Tai Shin, the appellant, 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: \$143,390
IMPR.: \$307,602
TOTAL: \$450,992

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 4,506 square feet of living area. The dwelling was constructed in 1994. Features of the home include a full basement with 1,773 square feet of finished area, central air conditioning, a fireplace and a 792 square foot garage. The property has a 54,886 square foot site and is located in Lake Forest, West Deerfield 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 .30 of a mile from the subject. The comparable parcels range in size from 54,014 to 60,113 square feet of land area and have each been improved with a two-story dwelling of brick or wood siding exterior construction. The homes were built from 1994 to 2001 and range in size from 4,179 to 5,331 square feet of living area. Each dwelling has a full or partial basement with finished area ranging

in size from 694 to 1,800 square feet, central air conditioning, a fireplace and a garage ranging in size from 704 to 910 square feet of building area. Comparables #2 and #3 each have inground swimming pools of 200 and 600 square feet, respectively. The comparables sold from March 2016 to May 2017 for prices ranging from \$929,000 to \$1,150,000 or from \$187.90 to \$270.83 per square foot of living area, including land. Based on this evidence, the appellant requested a reduced total assessment of \$337,674 which would reflect a market value of \$1,013,123 or \$224.84 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 \$450,992. The subject's assessment reflects a market value of \$1,360,459 or \$301.92 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 .923 of a mile from the subject. The comparable parcels range in size from 20,530 to 62,291 square feet of land area and have each been improved with a part 1.5-story and part 1-story, a 2.5-story or two, 2-story dwellings of brick or wood siding exterior construction. The homes were built from 1987 to 2002 and range in size from 4,409 to 4,900 square feet of living area. Each home has a basement, two of which have finished areas of 2,341 and 2,438 square feet, respectively, central air conditioning, two or three fireplaces and a garage ranging in size from 725 to 816 square feet of building area. The comparables sold from January 2015 to March 2017 for prices ranging from \$1,465,000 to \$1,762,500 or from \$321.43 to \$399.75 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 comparable #3 and board of review comparables #2, #3 and #4 due to differences in location, lot size, design, age, dwelling size and/or date of sale as compared to the other comparables in the record which sold more proximate to the valuation date of January 1, 2017 and which are located more proximate to the subject with a more similar dwelling size and age.

The Board finds the best evidence of market value to be appellant's comparable sales #1 and #2 along with board of review comparable sale #1. These three most similar comparables sold between March 2016 and May 2017 for prices ranging from \$929,000 to \$1,575,000 or from \$187.90 to \$321.43 per square foot of living area, including land. The lowest sales price,

appellant's comparable #1, appears to be an outlier given the other sales in the record. The Board finds that the subject's assessment reflects a market value of \$1,360,459 or \$301.92 per square foot of living area, including land, which is between and supported by appellant's sale #2 and board of review sale #1 which are the best comparable sales in this record. Based on this evidence, the Board finds 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: October 20, 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

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

APPELLANT

Tai Shin, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld and Associates, LLC
33 North Dearborn Street
Suite 1850
Chicago, IL 60602

COUNTY

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