



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

APPELLANT: Jing Peng
DOCKET NO.: 17-03777.001-R-1
PARCEL NO.: 14-15-303-009

The parties of record before the Property Tax Appeal Board are Jing Peng, 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: \$43,146
IMPR.: \$117,283
TOTAL: \$160,429

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 2,598 square feet of living area. The dwelling was constructed in 2008. Features of the home include an unfinished full basement, central air conditioning and a 441 square foot attached garage. The property has a 15,481 square foot site and is located in Hawthorn Woods, Ela 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 0.49 of a mile from the subject property, but located in a different neighborhood code than the subject. The comparables have sites that range in size from 6,400 to 6,799 square feet of land area and are improved with two-story dwellings of wood siding exterior construction that range in size from 2,546 to 2,640 square feet of living area. The homes were built from 2006 to 2008. Each comparable has an

unfinished basement, central air conditioning, one or two fireplaces and an attached garage that range in size from 400 to 528 square feet of building area. The comparables sold from April 2015 to March 2017 for prices ranging from \$372,500 to \$400,000 or from \$144.89 to \$157.11 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$129,114.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$160,429. The subject's assessment reflects a market value of \$483,949 or \$186.28 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 three comparable sales located within approximately 0.16 of a mile and within the same neighborhood code as the subject property. The comparables have sites that range in size from 13,155 to 25,030 square feet of land area and are improved with two-story dwellings of wood siding exterior construction that range in size from 2,979 to 3,450 square feet of living area. The homes were built from 2009 to 2014. Each comparable has an unfinished basement, central air conditioning, one fireplace and a garage that range in size from 641 to 710 square feet of building area. The comparables sold from April 2016 to July 2017 for prices ranging from \$637,000 to \$695,000 or from \$201.45 to \$223.56 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 six comparables for the Board's consideration. The Board gives least weight to the appellant's comparable #1 due to its 2015 sale date which is dated and less indicative of market value as of the subject's January 1, 2017 assessment date. The Board also gives little weight to the board of review's comparables #2 and #3 which have a larger site size, dwelling size and/or newer age when compared to the subject. The Board finds the best evidence of market value to be the appellant's comparables #2 and #3 along with board of review comparable #1 which are more similar to the subject in terms of age, design, dwelling size and most features, despite two comparables having considerably smaller sites. These most similar comparables sold for wide ranging prices from \$382,500 to \$637,000 or from \$144.89 to \$207.42 per square foot of living area, including land. The board of review comparable #1 is most similar to the subject, is located on the subject's street, but with a slightly larger dwelling size. The subject's assessment reflects a market value of \$483,949 or \$186.28 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. After considering adjustments to the comparables for differences with the subject,

such as location, land area and dwelling size, the Board finds no reduction in the subject's assessment is 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: June 16, 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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