



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

APPELLANT: Hong Wang
DOCKET NO.: 18-00268.001-R-1
PARCEL NO.: 06-02-201-006

The parties of record before the Property Tax Appeal Board are Hong Wang, the appellant; 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: \$12,104
IMPR.: \$50,840
TOTAL: \$62,944

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 2018 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 split-level dwelling of wood siding exterior construction with 1,292¹ square feet of living area. The dwelling was constructed in 1990. Features of the home include a lower level with finished area, central air conditioning and a two-car garage with 460 square feet of building area. The property has a 10,251 square foot site and is located in Lindenhurst, Lake Villa Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$158,000

¹ The appellant's appraiser reported a dwelling size of 1,250 square feet of living area while the board of review reported a dwelling size of 1,292 square feet. Both parties submitted sketches of the subject property. The Board finds that the slight size difference is no relevant to determining the correct assessment of the subject property based on the evidence in the record.

as of July 22, 2018. The appraisal was prepared by Raymond A. Anderson, a certified residential real estate appraiser.

The purpose of the appraisal was to determine market value of the subject property for a tax appeal. The appraised value was identified as retrospective; however, the effective date, report date and inspection date were each July 22, 2018. The subject property was identified as owner occupied. The appraiser described the condition of the subject as "average condition with no required repairs." In the grid, the subject's condition is identified as below average versus the average condition stated under Description of Improvements section of the appraisal. In estimating the market value of the subject property, the appraiser developed the comparable sales approach to value and noted that the income approach was considered but not developed due to a lack of reliable market rental data.

In estimating the subject's market value, the appraiser utilized four comparable sales located within 0.60 of a mile from the subject property. The appraiser noted in his supplemental addendum that the search for comparables focused on locations proximate to the subject that were also in fair to average condition. Condition ratings of the comparables, as shown in the comparable grid, are average, rehab or superior. The comparables have sites that range in size from 9,614 to 12,349 square feet of land area and are improved with raised ranch style dwellings² of average or superior quality construction that range in size from 768 to 1,152 square feet of above grade living area. The homes range in age from 35 to 47 years. Each comparable has a basement or lower level with finished area, central air conditioning and a two-car garage. The comparables sold from April 2017 to January 2018 for prices ranging from \$154,000 to \$209,450 or from \$135.80 to \$236.98 per square foot of above grade living area, land included. The appraiser adjusted the comparables for concessions, site size, quality of construction, condition, bath count, dwelling size and basement finishes which he indicated were supported by extracting market data in combination with match paired sales analysis. These adjustments resulted in adjusted values for the comparables ranging from \$157,700 to \$170,500. Based on these adjusted sales, the appraiser arrived an opinion of market value for the subject of \$158,000.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$52,662 which equates to a market value of \$158,002 or \$122.29 per square foot of living area, land included when applying the statutory assessment level of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$62,944. The subject's assessment reflects a market value of \$190,278 or \$147.27 per square foot of living area, land included, when using the 2018 three year average median level of assessment for Lake County of 33.08% as determined by the Illinois Department of Revenue.

The board of review submitted comments and a grid analysis on the appraiser's comparables. They noted that appraisal comparables #1, #2 and #3 are not raised ranches as described by the appraiser. They also noted that the appraiser indicated that most consideration was given to appraisal comparable #1 which sold over a year from the appraisal date.

² Board of review provided property record cards for the appraiser's comparables #1-#3 disclosing the dwellings to be a split-level design.

In support of its contention of the correct assessment the board of review submitted information on eight comparable sales located within approximately 0.82 of a mile from the subject property. The comparables have sites that range in size from 9,111 to 11,581 square feet of land area and are improved with split-level dwellings of wood siding exterior construction that range in size from 1,028 to 1,248 square feet of above grade living area. The homes were built from 1972 to 1984. Each comparable has a finished lower level and a garage ranging in size from 440 to 624 square feet of building area. Seven comparables have central air conditioning and six comparables each have one fireplace. The comparables sold from May 2017 to June 2018 for prices ranging from \$190,000 to \$227,500 or from \$170.53 to \$198.71 per square foot of above grade living area, land included. 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 an appraisal and eight comparable sales for the Board's consideration. The Board gave less weight to the opinion of value contained in the appraisal report as the condition ratings of comparables #2, #3 and #4 were significantly different from that of the subject. Additionally, a series of small discrepancies in data and consistency within the report leads the Board to question the credibility of the final opinion of value.

The Board gave less weight to the board of review comparables #1, #3 and #5 through #8 which are dissimilar to the subject in age. The Board finds the best evidence of market value to be the board of review comparables #2 and #4 which are most similar to the subject in location, age, design and features. These two best comparables sold in June and April 2018 for prices of \$195,000 and \$205,000 or for \$189.69 and \$181.42 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$190,278 or \$147.27 per square foot of living area, including land, which falls below the sale price and price per square foot of the two best comparable sales in the record. After considering adjustments to the comparables for differences with the subject, the Board finds a preponderance of the evidence supports the subject's assessment and a reduction 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:

November 17, 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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