



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

APPELLANT: Hong Wang
DOCKET NO.: 18-00275.001-R-1
PARCEL NO.: 07-21-308-028

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: \$20,755
IMPR.: \$75,902
TOTAL: \$96,657

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 two-story dwelling of wood siding exterior construction that was built in 1990. The dwelling contains 2,287 square feet of living area.¹ Features include a full basement that has finished area with a half bath,² central air conditioning, a fireplace and a two-car garage with 420 square feet of building area. The subject has a 12,538 square foot site. The subject property is located in Gurnee, Warren Township, Lake County.

¹ The appellant's appraiser reported a dwelling size of 2,301 square feet whereas the assessing officials report a dwelling size of 2,287 square feet. While both parties have schematic drawings to support their respective conclusions, the Board finds this slight size discrepancy does not prohibit a determination of the correct assessment on this record.

² Although the assessing officials report an unfinished basement, the appraiser, who inspected the property, reported an 80% finished basement with a half bath which is supported by photographs in the appraisal report.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared by Raymond A. Anderson, Certified Residential Real Estate Appraiser. The appraisal was prepared using fee simple rights and based on the sales comparison approach to value estimated the subject property had a market value of \$252,000 as of January 1, 2018.

Anderson reported that he inspected the subject property on June 22, 2018. The appraiser found the dwelling to be in below average condition with no required repairs and deemed to have an effective age of 15 years, which is newer than the actual age of 28 years. Among the photographs in the appraisal report are eight photographs, exterior and interior, with the identifier of "deferred maintained" [sic]. The subject property was identified as tenant occupied. The cost approach to value was not used and the income approach to value was considered but "not applied due to the lack of reliable single-family rental data in the subject market area."

Using the sales comparison approach to value, the appraiser analyzed four comparable sales located within .33 miles from the subject property. In the grid, the subject's condition is identified as "average" contrary to the previous description based on viewing; the comparables were identified as having either average, good or superior conditions. The parcels range in size from 10,000 to 22,269 square feet of land area with either a residential view like the subject or a pastoral or an open area. Each parcel has been improved with a "traditional" dwelling that was 21 to 28 years old. The homes range in size from 1,617 to 2,636 square feet of living area. Each comparable has a full basement, one of which is finished and has a half bath. Each of the comparables had an "average" quality of construction like the subject and an average functional utility whereas the subject has a "typical" functional utility. Each dwelling has central air conditioning and a two-car or a three-car garage. Three of the comparables each have a fireplace. The comparables sold from March to September 2017 for prices ranging from \$229,000 to \$290,000 or from \$110.02 to \$141.62 per square foot of living area, including land.

The appraiser made adjustments to the comparables for differences when compared to the subject for financing concessions, location, lot size, condition differences, number of bathrooms, dwelling size, lack of basement finish and/or fireplace amenity. Besides the inconsistent downward adjustments to appraisal sales #2, #3 and #4 for condition in which "superior" dwellings were adjusted by \$20,000 and "good" condition dwellings were adjusted by \$25,000. From this process, the appraiser concluded adjusted sales prices ranging from \$251,500 to \$265,500 or from \$96.14 to \$155.76 per square foot of living area, including land. Based on the foregoing data and analysis, the appraiser estimated a market value for the subject property as of January 1, 2018 of \$252,000 or \$110.19 per square foot of living area, including land, based upon a dwelling size of 2,287 square feet.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$83,992 which equates to a market value of approximately \$252,000, 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 \$96,657. The subject's assessment reflects a market value of \$292,192 or \$127.76 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.

In support of its contention of the correct assessment, the board of review submitted two grid analyses with information on seven comparable sales; for ease of reference, the Board has renumbered the second page of comparables as #5, #6 and #7. The comparable sales are located within approximately 0.24 of a mile from the subject property. The comparables have sites that range in size from 10,001 to 14,890 square feet of land area and are improved with two-story dwellings of wood siding exterior construction that range in size from 2,287 to 2,378 square feet of living area. The homes were built in 1989 or 1990 and have an average condition rating like the subject. Each comparable has a basement, six of which have finished areas, central air conditioning, a fireplace and a garage of either 420 or 440 square feet of building area. The comparables sold from May 2016 to June 2018 for prices ranging from \$320,000 to \$359,000 or from \$136.87 to \$156.97 per square foot of 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 appellant submitted an appraisal of the subject property and the board of review submitted seven suggested comparable sales in order to support their respective positions before the Property Tax Appeal Board. The Board has given no weight to the value conclusion of the appellant's appraisal report due to the inexplicable inconsistent adjustments for condition. Anderson applied greater adjustments to "good" condition of \$25,000 than was applied to a "superior" condition of \$20,000. He also adjusted appraisal sales #4 for "open area" location but did not address the "pastoral" location of comparable #2. These inconsistencies undermine the credibility of the appraisal's final value conclusion. Given the lack of credibility in the value conclusion, the Board will examine the raw sales data presented by both parties.

The Board has given reduced weight to appraisal sales #1 and #3 due to differences in dwelling size when compared to the subject dwelling. Board of review comparable sale #1 is given less weight as the sale is dated from 2016 as compared to other sales in the record in estimating the subject's market value as of January 1, 2018.

The Board finds the best evidence of market value to be the appellant's appraisal sales #2 and #4 along with board of review comparable sales #2 through #7. These eight comparables have varying degrees of similarity to the subject in age, dwelling size and present several similar features such as finished basement area. The comparables sold between March 2017 and June 2018 for prices ranging from \$264,000 to \$359,000 or from \$114.24 to \$156.97 per square foot of living area, including land. The subject's assessment reflects a market value of \$292,192 or \$127.76 per square foot of living area, including land, which is within the range established by

the best comparable sales in the record and well-supported by nearly identical comparables presented as board of review sales #2, #5 and #7 which recently sold for prices ranging from \$146.70 to \$156.97 per square foot of living area, including land, which is higher than the subject's estimated market value as reflected by its assessment. Based on this evidence and after considering adjustments to the comparables for differences when compared to the subject, 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:

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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