



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

APPELLANT: Hong Wang
DOCKET NO.: 18-00276.001-R-1
PARCEL NO.: 07-10-306-022

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: \$18,634
IMPR.: \$79,991
TOTAL: \$98,625

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 1987. The dwelling contains 2,636 square feet of living area.¹ Features include a full basement that has finished area, central air conditioning, a fireplace and a two-car garage containing 490 square feet of building area. The subject has a 17,791 square foot site. The subject property is located in Warren Township, Lake County.

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

¹ The appellant's appraiser reported a dwelling size of 2,565 square feet whereas the assessing officials report a dwelling size of 2,636 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.

comparison approach to value estimated the subject property had a market value of \$260,000 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 31 years. 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 six comparable sales located within .54 miles from the subject property. In the grid, the subject's condition is identified as below average versus the below average, good and superior conditions stated for the comparables. The parcels range in size from 9,000 to 26,500 square feet of land area with a residential view like the subject. Each parcel has been improved with a "traditional" dwelling that was 27 to 30 years old. The homes range in size from 1,872 to 2,636 square feet of living area. Each comparable has a full basement with finished area, one of which also has a half bath. Each of the comparables had an "average" quality of construction like the subject. Each dwelling has central air conditioning, a fireplace and a two-car garage. The comparables sold from March to December 2017 for prices ranging from \$238,500 to \$305,000 or from \$115.19 to \$127.40 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, lot size, quality of construction despite that each comparable was deemed to be "average" like the subject, condition differences, dwelling size and/or porch/patio/deck amenities. Besides the inconsistent downward adjustments to appraisal sales #3 and #5 of \$10,000 for "average" quality of construction like the subject, there were inconsistent condition adjustments in which "superior" dwellings were adjusted by \$15,000 and "good" condition dwellings were adjusted by \$30,000. From this process, the appraiser concluded adjusted sales prices ranging from \$258,751 to \$280,545 or from \$104.53 to \$144.12 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 \$260,000 or \$98.63 per square foot of living area, including land, based upon a dwelling size of 2,636 square feet.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$86,658 which equates to a market value of \$260,000, 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 \$98,625. The subject's assessment reflects a market value of \$298,141 or \$113.10 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 six comparable sales; for ease of reference, the Board has renumbered the second page of comparables as #5 and #6. The comparable sales are located

within approximately 0.71 of a mile from the subject property. The comparables have sites that range in size from 10,000 to 13,623 square feet of land area and are improved with two-story dwellings of wood siding exterior construction that range in size from 2,462 to 2,944 square feet of living area. The homes were built from 1989 to 1993 and have an average condition rating like the subject. Each comparable has a basement, three of which have finished areas, central air conditioning, a fireplace and a garage ranging in size from 451 to 650 square feet of building area. The comparables sold from April 2016 to July 2018 for prices ranging from \$280,000 to \$439,500 or from \$112.55 to \$155.85 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 six 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 both condition and quality of construction. Anderson applied greater adjustments to "good" condition of \$30,000 than were applied to "superior" condition of \$15,000 and he also adjusted appraisal sales #3 and #5 for "average" quality of construction when no other comparables were adjusted for the same characterization of quality of construction. 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 #2, #4 and #5 along with board of review sale #6 due to differences in dwelling size when compared to the subject dwelling. Additionally, board of review comparable sale #3 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 #1, #3 and #6 along with board of review comparable sales #1, #2, #4 and #5. These seven comparables have varying degrees of similarity to the subject and bracket the subject in dwelling size and present several similar features. The comparables sold between May 2017 and July 2018 for prices ranging from \$274,500 to \$439,500 or from \$112.55 to \$155.85 per square foot of living area, including land. The subject's assessment reflects a market value of \$298,141 or \$113.10 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. 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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