



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

APPELLANT: Xiaobo Li  
DOCKET NO.: 18-00471.001-R-1  
PARCEL NO.: 06-19-305-017

The parties of record before the Property Tax Appeal Board are Xiaobo Li, 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:** \$ 9,133  
**IMPR.:** \$42,856  
**TOTAL:** \$51,989

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 vinyl siding exterior construction that has 2,029 square feet of living area. The dwelling was constructed in 2003. Features include a concrete slab foundation, central air conditioning and a two-car garage. The subject has a 2,736 square foot site. The subject property is located in Avon Township, Lake County.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation based on the subject's recent sale. The appellant completed Section IV of the residential appeal petition disclosing the subject's August 2016 sale of \$121,000. It was not disclosed if the sale involved family or related parties. The appellant indicated the property was advertised for sale through the Multiple Listing Service for approximately seven months. The appellant submitted a copy of the settlement statement associated with the sale of the subject property depicting a sale

price of \$121,000 in August 2016. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect its sale price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject property of \$51,989. The subject's assessment reflects an estimated market value of \$157,161 or \$77.46 per square foot of living area including land area when applying Lake County's 2018 three-year average median level of assessment of 33.08%.

In support of the subject's assessment, the board of review submitted an analysis of four comparable sales located in close proximity to the subject with three comparables located along the same street as the subject. They consist of two-story dwellings vinyl siding exterior construction that were built in 2004 to 2005. Two comparables do not have a basement; one comparable has a partial unfinished basement; and one comparable has a partial basement with 680 square feet of finished area. The dwellings contain 2,029 square feet of living area and are situated on sites that range in size from 2,361 to 2,548 square feet of land area. The comparables sold from February 2016 to May 2018 for prices ranging from \$162,500 to \$190,000 or from \$80.09 to \$93.64 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 as a basis of the appeal. 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.

The Board gave less weight to the subject's August 2016 sale. The Board finds the sale is somewhat dated as the transaction occurred 16 months prior to the subject's January 1, 2018 assessment date. In addition, the appellant failed to disclose whether the sale involved family or related parties, one of the key elements in determining if the sale was an arm's-length transaction.

The board of review submitted four comparable sales in support of the subject's assessment. The Board gave less weight to comparables #2 and #3. Comparable #2 has a partial unfinished basement, superior when compared to the subject's concrete slab foundation. Comparable #3 has a superior partial finished basement and sold in 2016, which is dated and less indicative of market value as of the subject's January 1, 2018 assessment date. The Board finds the two remaining comparables are most similar when compared to the subject in location, land area, design, age, dwelling size and features. They sold in April and May of 2018 for prices of \$164,600 and \$170,000 or \$81.12 and \$83.79 per square foot of living area including land. The subject's assessment reflects an estimated market value of \$157,161 or \$77.46 per square foot of living area including land, which is less than the most similar comparable sales contained in the record. After considering any necessary adjustments to the comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. The Board further finds the most credible market value evidence in the

record demonstrates the subject's 2016 sale was not reflective of market value as of the January 1, 2018 assessment date. Based on this analysis, the Board finds no reduction in the subject's assessment is warranted.

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: September 15, 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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