



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

APPELLANT: Young Kim
DOCKET NO.: 18-24379.001-R-1
PARCEL NO.: 01-28-416-008-0000

The parties of record before the Property Tax Appeal Board are Young Kim, the appellant, by attorney Noah J. Schmidt, of Schmidt Salzman & Moran, Ltd. in Chicago; and the Cook 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 **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$6,091
IMPR.: \$70,760
TOTAL: \$76,851

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook 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 frame and masonry exterior construction with 3,625 square feet of living area. The dwelling is approximately 6 years old. Features of the property include a full unfinished basement, central air conditioning, one fireplace and a three-car garage. The property has a 22,152 square foot site and is located in South Barrington, Barrington Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the as the basis of the appeal. In support of the improvement assessment inequity argument, the appellant submitted information on five equity comparables that are located within the same neighborhood code as the subject. The comparables are improved with two-story class 2-78 dwellings of frame or frame and masonry exterior construction ranging in size from 3,144 to 3,351 square feet of

living area. The dwellings range in age from 16 to 32 years old and have full basements with two comparables having finished area. Each comparable has central air conditioning, from one to three fireplaces and from a two-car to a four-car garage. The comparables have improvement assessments ranging from \$50,901 to \$57,570 or from \$15.84 to \$17.22 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$61,625 or \$17.00 per square foot of living area.

The appellant submitted a copy of the 2018 final decision issued by the Cook County Board of Review disclosing the total assessment for the subject of \$76,851. The appellant reported the subject's improvement assessment in the appeal petition to be \$70,760 or \$19.52 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" for a different parcel than the subject. In support of its contention of the correct assessment, the board of review submitted information on three equity comparables that are located within the same neighborhood code as the subject property. The comparables are improved two-story class 2-78 dwellings of frame or frame and masonry exterior construction ranging in size from 3,113 to 3,773 square feet of living area. The dwellings are either 4 or 9 years old and have full basements with one comparable having finished area. Each comparable has central air conditioning, one fireplace and either a two-car or a three-car garage. The comparables have improvement assessments ranging from \$58,508 to \$71,687 or from \$18.78 to \$19.00 per square foot of living area. Based on the foregoing evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 a total of eight comparable properties for the Board's consideration. The Board gave less weight to the appellant's comparables and the board of review comparable #2 due to their significantly older ages and/or finished basement areas when compared to the subject.

The Board finds the best evidence of assessment equity to be the board of review comparables #1 and #3 which are similar to the subject in age, dwelling size and/or some features. The Board gives most weight to the board of review comparable #1 which is slightly older than the subject but has identical amenities. These comparables have improvement assessments of \$62,725 and \$71,687 or \$18.78 and \$19.00 per square foot of living area, respectively. The subject's improvement assessment of \$70,760 or \$19.52 per square foot is bracketed by the two best comparables in this record on an overall basis but falls above these comparables on a per square foot basis. Nevertheless, the subject's slightly higher per square foot assessment is logical

considering its smaller dwelling size when compared to the comparable given most weight by the Board. Based on this record and after considering adjustments to the two best comparables for differences when compared to the subject and considering the well-established real estate principle of economies of scale, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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

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: December 21, 2021



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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