



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

APPELLANT: Eun Chang  
DOCKET NO.: 19-04517.001-R-2  
PARCEL NO.: 16-04-100-010

The parties of record before the Property Tax Appeal Board are Eun Chang, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Lake Forest; 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:** \$263,494  
**IMPR.:** \$416,750  
**TOTAL:** \$680,244

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 2019 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 with brick and wood siding exterior construction containing 7,250 square feet of living area. The dwelling was constructed in 1928. Features of the home include an unfinished basement, central air conditioning, three fireplaces, an attached 704 square foot garage and a swimming pool. The property has a 100,190 square foot site and is located in Lake Forest, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable properties that are located from .94 of a mile to 1.14 miles from the subject and not located within the same neighborhood code as the subject. The comparables have sites ranging in size from 64,470 to 75,790 square feet of land area that are improved with one-story or two-story dwellings containing from 5,849 to 6,881 square feet of living area. The dwellings were built from 1989 to 1993. The comparables have

basements, two of which have finished area, central air conditioning, one or three fireplaces and an attached garage ranging in size from 1,153 to 1,506 square feet of building area. One comparable has a swimming pool. Two of the comparables sold in June 2018 and June 2019 for prices of \$1,772,500 and \$1,290,000 or \$257.59 and \$220.55 per square foot of living area, including land, respectively. The appellant's submission included a brief noting the appellant's comparables are located in close proximity to the subject but are newer, when compared to the subject.

Based on this evidence the appellant requested the subject's assessment be reduced to \$543,696, which reflects a market value of \$1,653,074 or \$228.01 per square foot of living area, land included, when using the 2019 three-year average median level of assessment for Lake County of 32.89% as determined by the Illinois Department of Revenue.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$680,244. The subject's assessment reflects a market value of \$2,068,240 or \$285.27 per square foot of living area, land included, when using the 2019 three-year average median level of assessment for Lake County of 32.89% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales that are located from .19 to .89 of a mile from the subject. Comparable #3 is also located within the same neighborhood code as the subject. The comparables have sites ranging in size from 46,170 to 114,360 square feet of land area that are improved with two-story dwellings containing from 5,443 to 10,029 square feet of living area. The dwellings were built from 1914 to 2006 and have basements, one of which has finished area. Four comparables have central air conditioning, each comparable has from two to seven fireplaces, four comparables have an attached garage ranging in size from 332 to 1,073 square feet of building area and two comparables have a detached garage with 839 or 1,163 square feet of building area. Three comparables each have a swimming pool and one comparable has a wood frame greenhouse with glass walls. The comparables sold from August 2017 to November 2020 for prices ranging from \$2,075,000 to \$3,700,000 or from \$224.35 to \$390.38 per square foot of living area, including land, respectively. The board of review's submission included a brief arguing the appellant's comparables are inferior to the subject in both site and dwelling size. Furthermore, since the subject's June 2016 sale for \$2,145,000, the subject's Lake Forest market has fully stabilized and appreciated. The board of review submitted Multiple Listing Service (MLS) data, including interior photographs, associated with the subject's June 2016 sale and MLS data for the board of review's comparables.

Based on this evidence the board of review requested the subject's assessment be increased to \$724,928, which reflects a market value of \$2,204,099 or \$304.01 per square foot of living area, land included, when using the 2019 three-year average median level of assessment for Lake County of 32.89% as determined by the Illinois Department of Revenue.

### **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 record contains a total of eight comparable properties for the Board's consideration. The Board gives less weight to the appellant's comparable #1 due to the lack of recent sales data, which is required to support an overvaluation argument. In addition, the comparable has a dissimilar one-story style dwelling, when compared to the subject's two-story style of dwelling. The Board also gives less weight to the board of review's comparables #1 and #2, due to their sale dates occurring greater than 16 months prior to the January 1, 2019 assessment date at issue, and comparable #3 due to its sale date occurring greater than 20 months after the January 1, 2019 assessment date at issue. The Board finds the parties' remaining comparables are similar to the subject in many aspects, however, each of the parties' best comparables has a smaller dwelling and two lack a swimming pool, when compared to the subject. Nevertheless, the best comparables sold from June 2018 to June 2019 for prices ranging from \$1,290,000 to \$2,095,000 or from \$220.55 to \$384.90 per square foot of living area, including land. The subject's assessment reflects a market value of \$2,068,240 or \$285.27 per square foot of living area, including land, which falls within the range established by the best comparable sales in the record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. As a final point, the Board finds the subject's undisputed June 2016 purchase price of \$2,145,000 undermines the appellant's overvaluation argument. However, the board of review's request to increase the subject's assessment, to reflect an estimated market value of \$2,204,099 or \$304.01 per square foot of living area, including land, is not supported by the best evidence and the Board finds no change in the subject's assessment is 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:

May 17, 2022



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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