



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

APPELLANT: Youjein Hur
DOCKET NO.: 19-04999.001-R-1
PARCEL NO.: 11-20-414-003

The parties of record before the Property Tax Appeal Board are Youjein Hur, 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: \$56,124
IMPR.: \$85,322
TOTAL: \$141,446

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 of frame exterior construction with 2,143 square feet of living area. The dwelling was constructed in 1970. Features of the home include a basement, with finished area, central air conditioning, a fireplace and a 462 square foot garage.¹ The property has a 9,969 square foot site and is located in Libertyville, Libertyville 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 sales located within 0.16 of a mile from the subject property. The comparables have sites that range in size from 9,957 to 11,410 square feet

¹ The appellant failed to complete Section III – Description of Property. The Board finds the best description of the subject’s basement finish was reported in the subject’s Multiple Listing Service sheet submitted by the board of review.

of land area and are improved with two-story dwellings of frame exterior construction that range in size from 2,013 to 2,308 square feet of living area. The dwellings were built from 1969 to 1974. Two comparables are reported to have unfinished basements. Each comparable has central air conditioning, one fireplace and a garage ranging in size from 440 to 551 square feet of building area. The properties sold from August 2018 to August 2019 for prices ranging from \$285,000 to \$409,000 or from \$141.58 to \$185.40 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$130,710 which reflects a market value of \$392,169 or \$183.00 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$141,446. The subject's assessment reflects a market value of \$430,058 or \$200.68 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 four comparable sales located within 0.57 of a mile from the subject property. The comparables have sites that range in size from 9,700 to 12,120 square feet of land area and are improved with two-story dwellings of wood siding exterior construction that range in size from 1,948 to 2,155 square feet of living area. The homes were built from 1972 to 1975. Each comparable is reported to have an unfinished basement, central air conditioning, one fireplace and a garage with either 431 or 441 square feet of building area. The properties sold from February to June 2018 for prices ranging from \$432,000 to \$475,000 or from \$218.10 to \$243.84 per square foot of living area, land included.

The board of review also submitted written comments, the subject's property record card and two Multiple Listing Service (MLS) sheets. Comments submitted by the board of review contend the subject's 2019 assessment reflects a market value below its 2017 sale price of \$480,900 which was documented in a copy the MLS sheet associated with the subject's 2017 sale in which the subject was described as "move in ready" and having finished basement area. The board of review also noted that the subject's finished basement area is excluded from both parties' grid analysis and the subject's property record card. The board of review critiqued the appellant's comparables arguing its comparables #1 and #3 are not credible comparable properties due to a lack of basement or a sale price significantly lower than all other comparables presented by the parties. The MLS sheet for the appellant's comparable #1 describes the property as a "great opportunity for buyers with design ideas and ready to put in sweat equity." Based on this evidence, the board of review requested the subject's assessment be increased to \$160,284 which would equate to a market value of \$480,900, when applying the statutory level of assessment of 33.33%.

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 parties submitted seven comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #1 which, based on its sale price, appears to be an outlier when compared to other comparables in the record. The Board also gives less weight to the appellant's comparable #3 which lacks a basement, in contrast to the subject's finished basement.

The Board finds the best evidence of market value to be the remaining comparables which are more similar to the subject in location, age, dwelling size and most features, although none of these properties have finished basement area like the subject. These comparables sold from February 2018 to June 2019 for prices ranging from \$394,000 to \$475,000 or from \$170.17 to \$243.84 per square foot of living area, including land. The subject's assessment reflects a market value of \$430,058 or \$200.68 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. After considering adjustments to the comparables for differences from 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: March 15, 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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