



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

APPELLANT: Shirley Ji
DOCKET NO.: 19-06844.001-R-1
PARCEL NO.: 16-03-109-005

The parties of record before the Property Tax Appeal Board are Shirley Ji, the appellant, by attorney Andrew J. Rukavina of The Tax Appeal Company in Mundelein; 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: \$195,058
IMPR.: \$368,617
TOTAL: \$563,675

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 brick exterior construction with 5,452 square feet of living area. The dwelling was constructed in 1989 and is approximately 30 years old. Features of the home include an unfinished basement, central air conditioning, six full baths, one half bath, three fireplaces and a 1,142 square foot garage. The property has a 37,690 square foot site and is located in Lake Forest, Moraine Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on five comparable sales located from .30 to 1.14 miles from the subject property, none which have the same assessment neighborhood code as the subject. The appellant reported that four comparables have sites ranging in size from 27,430 to 47,840 square feet of land area, while the site size of comparable #2 was not disclosed. The comparables are improved with two-story dwellings of brick or frame exterior construction ranging in size from

4,399 to 6,112 square feet of living area. The dwellings range in age from 21 to 44 years old. The comparables each have a basement, three of which have finished area. Each comparable has central air conditioning, three or four full baths, one or two half baths, from one to four fireplaces and a garage ranging in size from 506 to 1,008 square feet of building area. Two comparables each have an inground swimming pool. The properties sold from August 2016 to December 2018 for prices ranging from \$1,035,000 to \$1,555,000 or from \$216.79 to \$270.16 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$486,040, which would reflect a market value of \$1,458,266 or \$267.47 per square foot of living area, including land, when using 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 \$563,675. The subject's assessment reflects a market value of \$1,713,819 or \$314.35 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 three comparable sales located from .05 to .29 of a mile from the subject property, one of which has the same assessment neighborhood code as the subject. The comparables have sites ranging in size from 25,200 to 40,590 square feet of land area and are improved with two-story dwellings of brick, stucco, or brick and wood siding exterior construction ranging in size from 3,997 to 5,148 square feet of living area. The dwellings were built from 1947 to 2001 with comparables #1 and #3 having reported effective ages of 1992 and 1987, respectively. The board of review reported that one comparable has a concrete slab foundation and two comparables each have a basement finished with a recreation room. Each comparable has central air conditioning, either three or five full baths, one or two half baths and two or three fireplaces. Comparables #1 and #2 each have a garage with 648 and 660 square feet of building area, respectively. Comparable #3 has an inground swimming pool. The properties sold from March to September 2018 for prices ranging from \$1,710,000 to \$3,000,000 or from \$332.17 to \$620.22 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. 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 suggested comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables #2 through #5, as comparable #2 has a smaller dwelling size when compared to the subject, is located more than a mile away from the subject and no site size was provided for the property which detracts from the weight that can be given to this sale; comparables #3 and #4 have sale dates occurring in 2016 which are dated

and less likely to be indicative of the subject's market value as of the January 1, 2019 assessment date; and comparable #5 is older in age when compared to the subject dwelling. Furthermore, the appellant's comparables #3 and #5 each have an inground swimming pool, not a feature of the subject. The Board has given reduced weight to board of review comparables #2 and #3, as comparable #2 has a dissimilar one-story dwelling that is smaller in size and newer in age when compared to the subject dwelling and comparable #3 has a concrete slab foundation and no garage in contrast to the subject which has a basement and a garage. Furthermore, board of review comparable #3 has an inground swimming pool, unlike the subject.

The Board finds the best evidence of market value in the record to be the appellant's comparable #1 and the board of review's comparable #1. The Board finds these two comparables have varying degrees of similarity to the subject in location, dwelling size, design, age and features. Nevertheless, these properties sold in December 2018 and August 2018 for prices of \$1,325,000 and \$1,710,000 or for \$216.79 and \$332.17 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$1,713,819 or \$314.35 per square foot of living area, including land, which is slightly higher than the two best comparable sales in the record in terms of overall market value but bracketed by the comparables on a price per square foot basis. Based on this record and after considering adjustments to the comparables for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its 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:

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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