



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

APPELLANT: David Wang
DOCKET NO.: 19-06863.001-R-1
PARCEL NO.: 12-21-224-001

The parties of record before the Property Tax Appeal Board are David Wang, 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: \$62,530
IMPR.: \$222,022
TOTAL: \$284,552

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 2-story single family dwelling of wood siding exterior construction containing 3,286 square feet of living area.¹ The dwelling was built in 1885 and is approximately 134 years old. Features of the home include an unfinished full basement, central air conditioning, two fireplaces, and a garage with 550 square feet of building area. The property has a 4,500 square foot site and is located in Lake Bluff, Shields 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 within .8 of a mile from the subject and in the same assessment neighborhood code as the subject property. The comparables have sites ranging in size from 6,250 to 12,070 square feet of land area. The comparables are improved with 2-story dwellings with stucco or frame exterior construction that range in size

¹ Some descriptive information was drawn from the subject's property record card submitted by the board of review.

from 2,847 to 4,223 square feet of living area. The comparables range in age from 114 to 129 years old. Each comparable has a full or partial basement with two being partially finished. Each dwelling also has central air conditioning and one or three fireplaces. Four comparables each have a garage ranging in size from 528 to 690 square feet of building area. The comparables sold from April 2017 to November 2018 for prices ranging from \$660,000 to \$1,137,500 or from \$216.45 to \$275.15 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$280,259 which would reflect a market value of \$840,861 or \$255.89 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 \$284,552. The subject's assessment reflects a market value of \$865,163 or \$263.29 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 an incredibly small font sales grid analysis containing difficult-to-read information on three comparable sales. The properties are located within the same assessment neighborhood code as the subject property. The comparables have parcels ranging in size from 9,310 to 19,970 square feet of land area and are improved with 2-story dwellings with wood siding exterior construction that range in size from 2,844 to 3,557 square feet of living area. The dwellings were built from 1882 to 1893, with the oldest dwelling having an effective age of 1940. Each dwelling has a partial or full basement with one being partially finished. Each home also has central air conditioning, one to three fireplaces, and a garage ranging in size from 400 to 588 square feet of building area. The comparables sold from June 2018 to September 2019 for prices ranging from \$1,035,000 to \$1,750,000 or from \$356.51 to \$491.99 per square foot of living area, including land. Based on this evidence, the board of review requested the assessment be sustained.

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 Board finds the parties submitted a total of eight comparable sales for the Board's consideration with varying degrees of similarity to the subject property. The Board gave less weight to appellant's comparables #1 and #5 as each of these comparables sold in 2017 with sale dates of 19 months or longer in time from the subject's January 1, 2019 assessment date at issue and, therefore, are less likely to accurately reflect the subject's market value as of the lien date than the remaining comparables in the record.

The Board finds the best evidence of market value to be the board of review comparables which are most similar to the subject in location, design, and some features. However, board of review

comparable #3 has a 667 square foot recreation room in the basement, a feature which the subject lacks, and each of the comparables has a site that is much larger than the subject, warranting a consideration of downward adjustments to these comparables to make them more equivalent to the subject. Nevertheless, these three best comparables in the record sold from June 2018 to September 2019 for prices ranging from \$1,035,000 to \$1,750,000 or from \$356.51 to \$491.99 per square foot of living area, including land. The subject's assessment reflects a market value of \$865,163 or \$263.29 per square foot of living area, including land, which is below the range established by the best comparable sales in this record, but appears justified given the subject's smaller site, smaller dwelling size, and/or unfinished basement. After considering adjustments to the comparables for differences from the subject, the Board finds that the assessment of the subject property as established by the board of review is supported and, thus, no reduction 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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