



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

APPELLANT: Ziqian Haung
DOCKET NO.: 19-07522.001-R-1
PARCEL NO.: 15-16-105-008

The parties of record before the Property Tax Appeal Board are Ziqian Haung, the appellant, by attorney Robert Rosenfeld of Robert H. Rosenfeld and Associates, LLC in Chicago; 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: \$44,635
IMPR.: \$191,069
TOTAL: \$235,704

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 wood siding and brick¹ exterior construction with 3,532 square feet of living area. The dwelling was constructed in 2001 and is approximately 18 years old. Features of the home include an unfinished walk-out basement, central air conditioning, a fireplace, three full baths, one half bath and a 722 square foot garage. The property has a 11,436 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity

¹ The Board finds the best description of the subject dwelling's exterior construction is found in the property record card provided by the board of review which reported the subject dwelling has a one-story brick front and was unrefuted by the appellant.

comparables with the same assessment neighborhood code as the subject and located within .25 of a mile from the subject property. The comparables are improved with two-story dwellings of wood siding or brick exterior construction ranging in size from 3,109 to 3,722 square feet of living area. The dwellings are 18 or 23 years old. Each comparable has an unfinished basement, central air conditioning, one or two fireplaces, two or three full baths and one half bath. Three comparables each have a garage ranging in size from 441 to 651 square feet of building area. The comparables have improvement assessments that range from \$161,659 to \$184,664 or from \$49.61 to \$52.63 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$182,516 or \$51.67 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$235,704. The subject property has an improvement assessment of \$191,069 or \$54.10 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on five equity comparables with the same assessment neighborhood code as the subject and located within .23 of a mile from the subject property. The comparables are improved with two-story dwellings of brick or wood siding exterior construction ranging in size from 3,567 to 3,885 square feet of living area. The dwellings were built were each built in 2001. The comparables all have basements, four of which are finished with a recreation room. Each comparable has central air conditioning, one or two fireplaces, from two to four full baths and a garage ranging in size from 420 to 672 square feet of building area. Four comparables each have one half bath. The comparables have improvement assessments that range from \$185,133 to \$206,964 or from \$51.90 to \$54.34 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer 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 record contains a total of nine suggested equity comparables for the Board's consideration. The Board has given less weight to the appellant's comparable #1 due to its smaller dwelling size when compared to the subject and to appellant's comparable #4 as it has no garage, a feature of the subject. The Board has given reduced weight to board of review comparables #1, #2, #3 and #5 as each has a basement recreation room in contrast to the subject's unfinished basement.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2 and #3, along with board of review comparable #4, which are relatively similar to the subject in location, dwelling size, design and age. However, the Board finds none of these comparables have a walk-out basement like the subject, each has a smaller garage and the appellant's

comparables have fewer bathrooms when compared to the subject. Nevertheless, the comparables have improvement assessments that range from \$174,466 to \$206,964 or from \$49.60 to \$53.60 per square foot of living area. The subject's improvement assessment of \$191,069 or \$54.10 per square foot of living area falls within the range established by the best comparables in the record in terms of overall improvement assessment but above the range on a square foot basis, which appears to be logical given its superior features. Based on this record and after considering adjustments to the comparables for differences when compared to the subject, 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



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Ziqian Haung, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld and Associates, LLC
33 North Dearborn Street
Suite 1850
Chicago, IL 60602

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085