



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

APPELLANT: Jinguang Liu
DOCKET NO.: 19-08601.001-R-1
PARCEL NO.: 15-33-215-005

The parties of record before the Property Tax Appeal Board are Jinguang Liu, 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 ***a reduction*** 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: \$29,462
IMPR.: \$108,744
TOTAL: \$138,206

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 is improved with a two-story dwelling of wood siding exterior construction with 2,640 square feet of living area. The dwelling was built in 1987 and is approximately 32 years old. Features of the home include a slab foundation, central air conditioning, and an attached garage with 420 square feet of building area. The property has a 7,209 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales improved with two-story dwellings with wood siding exteriors ranging in size from 2,278 to 2,930 square feet of living area. The homes range in age from 33 to 41 years old. Two comparables have slab foundations, two comparables have basements with one having finished area, and one comparable has one fireplace. Each comparable has central air conditioning and an attached garage with either 400

or 460 square feet of building area. The comparables have sites ranging in size from 6,825 to 10,397 square feet of land area. These properties each have the same assessment neighborhood code as the subject property and are located within .30 of one mile from the subject property. The sales occurred from February 2018 to April 2019 for prices ranging from \$360,000 to \$445,000 or from \$151.88 to \$161.62 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$138,206.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$148,949. The subject's assessment reflects a market value of \$452,870 or \$171.54 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 with board of review comparable #4 being the same property as appellant's comparable sale #3. Each comparable is improved with a two-story dwelling of wood siding exterior construction that range in size from 2,266 to 2,930 square feet of living area. The homes were built from 1981 to 1988 with comparables #1 and #4 having effective dates of construction of 2001 and 1988, respectively. Four of the comparables have a basement with three having finished area. Each comparable has central air conditioning and an attached garage with either 441 or 460 square feet of building area. The comparables have sites ranging in size from 7,670 to 11,600 square feet of land area. These properties have the same assessment neighborhood code as the subject and are located within approximately .29 of one mile from the subject property. The comparables sold from August 2018 to July 2019 for prices ranging from \$440,000 to \$520,000 or from \$151.88 to \$229.48 per square foot of living area, including land.

The board of review also disclosed the subject property sold in November 2017 for a price of \$340,000 or \$128.79 per square foot of living area, including land.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

Initially, the record disclosed the subject property was purchased in November 2017 for a price of \$340,000 or \$128.79 per square foot of living area, land included. The subject's assessment reflecting a market value of \$452,870 or \$171.54 per square foot of living area, land included, is approximately 33% above the purchase price. There was no explanation provided as to why the subject's assessment is so much greater than the purchase price. The Board finds the purchase price supports the conclusion the subject property is overvalued.

Of the sales submitted by the parties the Board gives most weight to appellant's comparable sales #1 and #2 and board of review comparable sale #3 as these properties are improved with

homes most similar to the subject in foundation as each property has a slab foundation like the subject property. Appellant's comparable sale #1 and board of review comparable #3 each have one fireplace, a feature the subject does not have, suggesting each would require a downward adjustment to make them more equivalent to the subject property. These three comparables sold for prices ranging from \$360,000 to \$454,900 or from \$158.03 to \$186.13 per square foot of living area, including land. The subject's assessment reflects a market value of \$452,870 or \$171.54 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. The Board finds; however, the subject's assessment is above two of the three best sales in this record. The Board finds that board of review comparable #3 may be considered an outlier as the purchase price is significantly above the subject's purchase price and above the two best sales provided by the appellant.

Less weight is given the remaining comparables due to differences from the subject in foundation type and/or foundation finish.

After considering the best sales submitted by the parties and the purchase of the subject property in November 2017, the Board finds a reduction in the subject's assessment commensurate with the appellant's request 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: June 21, 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

Jinguang Liu, 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