



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

APPELLANT: Diana Shin  
DOCKET NO.: 20-00289.001-R-1  
PARCEL NO.: 15-08-207-002

The parties of record before the Property Tax Appeal Board are Diana Shin, the appellant, by attorney Gregory Riggs, of Tax Appeals Lake County in Lake Zurich; 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:** \$22,533  
**IMPR.:** \$91,122  
**TOTAL:** \$113,655

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 2020 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 exterior construction with 2,347 square feet of living area. The dwelling was constructed in 1977. Features of the home include a concrete slab foundation, central air conditioning, a fireplace and a 462 square foot garage. The property has a 5,500 square foot site and is located in Vernon Hills, Vernon Township, Lake County.

The subject property is an owner-occupied residence that was the subject matter of an appeal before the Property Tax Appeal Board the prior year under Docket Number 19-02809.001-R-1. In that appeal, the Property Tax Appeal Board rendered a decision lowering the assessment of the subject property to \$114,322 based on a stipulation between the parties. In its submission, the board of review reported that 2019 was the beginning of the subject's general assessment cycle.

The appellant contends overvaluation as the basis of the appeal. In support of the overvaluation argument, the appellant submitted five comparable sales located within 0.60 of a mile from the subject property. The comparables have sites that range in size from 5,500 to 9,332 square feet of land area that are improved with two-story dwellings of frame exterior construction each with 2,347 square feet of living area. The homes were built from 1977 to 1984. One of the comparables has an unfinished basement, three comparables each have one fireplace and each comparable has central air conditioning and a garage with 462 square feet of building area. The comparables sold from October 2019 to February 2020 for prices ranging from \$260,000 to \$337,000 or from \$110.78 to \$143.59 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$103,989. The requested assessment reflects a total market value of \$311,998 or \$132.93 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 \$113,655. The subject's assessment reflects a market value of \$341,409 or \$145.47 per square foot of living area, land included when applying the 2020 three-year average median level of assessment for Lake County of 33.29% 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 located within 0.60 of a mile from the subject property. Board of review comparable #4 is the same property as the appellant's comparable #4. The comparables have sites that range in size from 5,510 to 10,040 square feet of land area that are improved with two-story dwellings of wood siding exterior construction with either 2,342 or 2,347 square feet of living area. The homes were built from 1976 to 1984. Two comparables have a concrete slab foundation, one comparable has a crawl space foundation and two comparables have a basement, one of which has finished area. Three comparables each have one fireplace and each comparable has central air conditioning and a garage with either 372 or 462 square feet of building area. The comparables sold from April to November 2019 for prices ranging from \$336,000 to \$390,000 or from \$143.16 to \$166.17 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

### **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 that pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185), a reduction in the subject's assessment is not warranted.

Initially, 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 on which a residence occupied by the owner is situated, such

reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review. (35 ILCS 200/16-185)

The Board finds the subject property was the subject matter of an appeal before the Property Tax Appeal Board for the 2019 tax year under Docket No. 19-02809.001-R-1 in which a decision was issued reducing the subject's assessment to \$114,332, based upon a stipulation between the parties. The record further disclosed the subject property is an owner-occupied dwelling. The Board also finds that the 2019 and 2020 tax years are in the same general assessment period and an equalization factor of 1.0037 was applied in Vernon Township in 2020. Furthermore, the decision of the Property Tax Appeal Board for the 2019 tax year was not reversed or modified upon review and there was no evidence the property sold establishing a different fair cash value. However, the Property Tax Appeal Board finds that if the 2020 equalization factor of 1.0037 for Vernon Township is applied to the subject's 2019 assessment established by this Board, pursuant to the dictates of Section 16-185 of the Property Tax Code, the subject's 2020 assessment would be increased from the subject's 2020 assessment level. After considering the requirements of Section 16-185 of the Property Tax Code, the Property Tax Appeal Board finds that a reduction in the subject's assessment has not been established.

Alternatively, the Board finds the record contains nine sale comparables for the Board's consideration, as one property was common to both parties. The Board gives less weight to the appellant's comparable #2 which, based on sale price, appears to be an outlier, when compared to other sales in the record. The Board gives reduced weight to the appellant's comparable #5 along with board of review comparables #3 and #5 which differ from the subject in foundation type. The Board finds the remaining six comparables are similar to the subject in location, age, design, dwelling size and other features. These properties present sale prices ranging from \$312,500 to \$390,000 or from \$133.15 to \$166.17 per square foot of living area, including land. The subject's assessment reflects a market value of \$341,409 or \$145.47 per square foot of living area, land included, 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 the comparables demonstrate the subject property is correctly valued for assessment purposes.

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: September 20, 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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