



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

APPELLANT: Susan Chung  
DOCKET NO.: 20-00309.001-R-1  
PARCEL NO.: 15-24-109-011

The parties of record before the Property Tax Appeal Board are Susan Chung, the appellant, 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:** \$69,297  
**IMPR.:** \$64,023  
**TOTAL:** \$133,320

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 brick and vinyl siding exterior construction with 1,996 square feet of living area. The dwelling was constructed in 1962 and is approximately 58 years old. Features of the home include a full basement with a recreation room, central air conditioning, a fireplace and a 484 square foot garage. The property has an approximately 20,038 square foot site and is located in Lincolnshire, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal challenging both the land and improvement assessments of the subject property. As part of the appeal, the appellant reported the property was purchased from an unrelated party via a contract for deed in April 2016, 44

months prior to the lien date at issue, for \$380,000 or \$190.38 per square foot of living area, including land. Furthermore, the property was advertised on the market via the Multiple Listing Service (MLS) for a period of 283 days prior to the sale.

In support of the overvaluation argument, the appellant submitted information on four comparable sales, three of which are located in the same assessment neighborhood code that has been assigned to the subject. The properties are located in either Lincolnshire or Riverwoods and reported to be either .2 or .3 of a mile from the subject. The comparable parcels range in size from 20,038 to 54,014 square feet of land area which are improved with either a one-story or a two-story dwelling of brick or brick and frame exterior construction. The dwellings range in age from 50 to 55 years old and range in dwelling size from 1,792 to 3,330 square feet of living area. Three comparables have basements, one of which has finished area. Features include central air conditioning, a fireplace and a two-car garage. Comparable #2 also has a three-season room. The comparables sold from January to December 2019 for prices ranging from \$340,000 to \$377,250 or from \$105.11 to \$189.73 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment of \$115,996, which would reflect a market value of \$348,023 or \$174.36 per square foot of living area, including land, 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 \$133,320. The subject's assessment reflects a market value of \$400,481 or \$200.64 per square foot of living area, land included, when using the 2020 three year average median level of assessment for Lake County of 33.29% as determined by the Illinois Department of Revenue.

In response to the appellant's evidence, the board of review contends that the subject dwelling has a superior basement/recreation room as compared to the comparables. Furthermore, three of the appellant's comparable dwellings are substantially larger than the subject dwelling.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located in the same assessment neighborhood code as assigned to the subject. The properties are located from .33 to .76 of a mile from the subject. The comparable parcels range in size from 20,040 to 25,700 square feet of land area which are improved with either a 1.5-story or a 2-story dwelling of brick or brick and frame exterior construction. The dwellings were built in either 1964 or 1969 and range in dwelling size from 1,967 to 2,157 square feet of living area. Two comparables have unfinished basements. Features include central air conditioning and a garage ranging in size from 460 to 575 square feet of building area. Two comparables each have a fireplace. The comparables sold from June to September 2020 for prices ranging from \$465,000 to \$550,000 or from \$232.50 to \$254.98 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's estimated market value as reflected by its assessment.

In rebuttal, the appellant critiqued each of the board of review comparable sales as being dissimilar to the subject in design, bedroom count and/or various updates and renovations. In conclusion, the appellant asserts that the comparable sales presented by the board of review reflect the high-end of the range of sale given their superior conditions and updating.

### **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 parties submitted a total of seven comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #3 and #4: comparable #3 is substantially larger than the subject dwelling and comparable #4 lacks a basement foundation which is a feature of the subject dwelling. Likewise, the Board has given reduced weight to board of review comparable #2 as this home lacks a basement foundation as well and thus is inferior to the subject dwelling's partially finished basement foundation.

The Board finds the best evidence of market value to be appellant's comparable sales #1 and #2 along with board of review comparable sales #1 and #3 which present varying degrees of similarity to the subject in design, dwelling size and several features. These most similar comparables sold from January 2019 to August 2020 for prices ranging from \$340,00 to \$490,000 or from \$142.05 to \$249.11 per square foot of living area, including land. The subject's assessment reflects a market value of \$400,481 or \$200.64 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and appears to be supported when considering necessary adjustments for differences in finished basement area, dwelling size and/or features. Furthermore, the subject's 2016 purchase price indicates that the subject property is not overvalued on this record. Based on the evidence and after a thorough evaluation of the parties' respective arguments, the Board finds a reduction in the subject's assessment is not supported.

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.

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Chairman



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Member



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Member



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Member



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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: July 19, 2022



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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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COUNTY

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