



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

APPELLANT: Peter Si
DOCKET NO.: 20-00728.001-R-1
PARCEL NO.: 01-11-202-003

The parties of record before the Property Tax Appeal Board are Peter Si, the appellant, by attorney Ronald Kingsley of Lake County Real Estate Tax Appeal, LLC in Lake Forest, 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: \$43,123
IMPR.: \$55,648
TOTAL: \$98,771

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 is improved with a one-story dwelling of wood siding exterior construction with approximately 1,200 square feet of living area.¹ The dwelling was constructed in 1960. Features of the home include an unfinished partial basement, central air conditioning, one fireplace, 1½ bathrooms, and a detached two-car garage. The property has a 14,370 square foot site and is located in Antioch, Antioch Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$251,000 as of January 1, 2018. The appraisal was prepared by Kenneth M. Jones, a certified residential real estate appraiser. In estimating the market value of the subject property, the appraiser

¹ The Board finds the best description of the subject property was contained in the appellant's appraisal, which includes a schematic diagram, measurements, calculations, and photographs of the subject dwelling.

developed the sales comparison approach to value using six comparables sales composed of ranch style, Cape Cod style, or two-story dwellings ranging in size from 1,228 to 2,236 square feet of living area. The homes range in age from 7 to 73 years old. Two comparables have basements with one having finished area and four comparables have one or two fireplaces. Each comparable has central air conditioning, 1½ to 3 bathrooms and a two-car or a three-car garage. These properties have sites ranging in size from 6,987 to 26,571 square feet of land area and are located from 1.37 to 4.80 miles from the subject property. The sales occurred from June 2017 to December 2017 for prices ranging from \$190,000 to \$312,000 or from \$139.53 to \$205.94 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject to arrive at adjusted prices ranging from \$188,100 to \$284,700 and concluded an estimated market value of \$251,000 as of January 1, 2018. The appellant requested the subject's assessment be reduced to \$79,017.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$98,771. The subject's assessment reflects a market value of \$296,699 or \$247.25 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 support of its contention of the correct assessment the board of review submitted information on five comparable sales improved with one-story dwellings of wood siding exterior construction ranging in size from 1,068 to 1,500 square feet of living area. The homes were built from 1954 to 1999. One comparable has a slab foundation and four comparables have full basements with two having finished area. Four comparables have central air conditioning, one comparable has a fireplace, each property has 1 to 3 bathrooms, and four comparables have garages ranging in size from 320 to 400 square feet of building area. Four comparables have sites ranging in size from 8,710 to 20,910 square feet of land area. The comparables are located from .96 to 1.47 miles from the subject property. The sales occurred from February 2020 to September 2020 for prices ranging from \$205,000 to \$370,000 or from \$187.08 to \$266.57 per square foot of living area, including land.

In rebuttal the board of review asserted the appellant's appraisal is dated 2018 with sales from 2017.

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 best evidence of market value to be the comparable sales submitted by the board of review. The board of review comparables sold more proximate in time to the assessment date than did the comparable sales used by the appellant's appraisal. Additionally, the comparable sales submitted by the board of review are more similar to the subject property in

location and/or dwelling style than are the comparable sales contained in the appellant's appraisal. The board of review comparable sales sold for prices ranging from \$205,000 to \$370,000 or from \$187.08 to \$266.57 per square foot of living area, including land. The subject's assessment reflects a market value of \$296,699 or \$247.25 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. Less weight is given the appellant's appraisal due to the effective date of the appraisal, the fact the comparable sales occurred in 2017 rather than more proximate in time to the assessment date, and differences from the subject dwelling is style and/or size. Based on this evidence the Board finds 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:

August 23, 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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