



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

APPELLANT: Sarah Jhin
DOCKET NO.: 20-02966.001-R-1
PARCEL NO.: 12-31-303-014

The parties of record before the Property Tax Appeal Board are Sarah Jhin, 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: \$137,944
IMPR.: \$526,036
TOTAL: \$663,980

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 custom dwelling of brick and stone exterior construction with 6,336 square feet of living area. The dwelling was constructed in 1999 and is approximately 21 years old. Features of the home include a basement that is finished with a recreation room, central air conditioning, five fireplaces and an 832 square foot attached garage. The property also has a 600 square foot inground swimming pool and a hot tub.¹ The property has an approximately 63,160 square foot site and is located in Lake Forest, Shields 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 subject's property record card presented by the board of review revealed the subject property has an inground swimming pool and hot tub that were built in 2003, which were not reported by the appellant.

comparables with the same assessment neighborhood code as the subject. The comparables are improved with two-story custom dwellings of brick, wood siding or stucco exterior construction ranging in size from 6,078 to 6,880 square feet of living area. The dwellings are 24 to 26 years old. The comparables each have a basement, two of which have finished area and one is a walk-out style. Each comparable has central air conditioning, two to four fireplaces and an attached garage ranging in size from 598 to 1,024 square feet of building area. The appellant reported that comparable #4 also has a detached garage. The comparables have improvement assessments that range from \$401,276 to \$545,240 or from \$66.02 to \$79.39 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$466,646 or \$73.65 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 \$663,980. The subject property has an improvement assessment of \$526,036 or \$83.02 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on five comparables with the same assessment neighborhood code as the subject. The comparables are improved with two-story custom dwellings of brick or stone and stucco exterior construction ranging in size from 5,238 to 7,245 square feet of living area. The dwellings were built from 1997 to 2005. The comparables each have a basement that is finished with a recreation room, central air conditioning, three to seven fireplaces and an attached garage ranging in size from 880 to 1,252 square feet of building area. Three comparables each have an attic, two with finished area. Two comparables each have an inground swimming pool, one of which also has a hot tub. The comparables have improvement assessments that range from \$513,778 to \$648,260 or from \$80.34 to \$98.09 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 board of review comparables #2 and #4 due to differences from the subject in size.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables, which are relatively similar to the subject in dwelling size, design and age. However, the Board finds two of the comparables lack a basement recreation room and six of the comparables lack an inground swimming pool, both features of the subject, suggesting upward adjustments would be required to make these comparables more equivalent to the subject. Nevertheless, the

comparables have improvement assessments that range from \$401,276 to \$648,260 or from \$66.02 to \$94.06 per square foot of living area. The subject's improvement assessment of \$526,036 or \$83.02 per square foot of living area falls within the range established by the best comparables in the record. Based on this record and after considering adjustments to the best 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:

December 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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