



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

APPELLANT: Lee Guo
DOCKET NO.: 20-03353.001-R-1
PARCEL NO.: 15-33-104-001

The parties of record before the Property Tax Appeal Board are Lee Guo, the appellant, by attorney Timothy C. Jacobs of Kovitz Shifrin Nesbit in Mundelein, 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: \$26,707
IMPR.: \$115,512
TOTAL: \$142,219

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 two-story dwelling of frame construction built in 1978 and contains 2,444 square feet of living area. Features of the home include a partial basement with a recreation room, central air conditioning, one fireplace and an attached garage with 460 square feet of building area. The property has a site with approximately 9,150 square feet of building area 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 of frame exterior construction that range in size from 2,266 to 2,930 square feet of living area. The homes were built from 1985 to 1989. Three comparables have basements with two having finished area. Each comparable has central air conditioning and a garage with either 441 or 460 square feet of building area. One comparable has a fireplace. The comparables have sites

ranging in size from 6,825 to 10,397 square feet of land area and are located from approximately .42 to .55 of one mile from the subject property. The sales occurred from January 2019 to July 2019 for prices ranging from \$365,000 to \$445,000 or from \$151.88 to \$161.08 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$131,854.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$142,219. The subject's assessment reflects a market value of \$427,212 or \$174.80 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 two-story dwellings of wood siding exterior construction that range in size from 2,266 to 2,470 square feet of living area. The homes were built from 1979 to 1986 with comparable #3 having an effective construction date of 2001. Each comparable has a full or partial basement with three having finished area, central air conditioning, and an attached garage with either 441 or 460 square feet of building area. Three comparables each have one fireplace. The comparables have sites ranging in size from 6,830 to 9,610 square feet of land area and are located from approximately .31 to .60 of one mile from the subject property. The sales occurred from July 2019 to November 2020 for prices ranging from \$436,000 to \$520,000 or from \$178.14 to \$229.48 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains nine comparable sales submitted by the parties to support their respective positions. The Board gives less weight to appellant's comparable #2 due to differences from the subject dwelling in size. The Board gives less weight to appellant's comparable #4 due to differences from the subject dwelling in foundation as this property has no basement whereas the subject property has a partial basement partially finished. The Board gives less weight to board of review comparable #3 due to its newer effective age in relation to the subject dwelling. The remaining comparables have either 2,444 or 2,470 square feet of living area and were built from 1979 to 1985. Appellant's comparable #1 and board of review comparable #2 lack finished basement area and a fireplace, features of the subject property, indicating each would require an upward adjustment to make them more equivalent to the subject property for these features. Board of review comparable #5 lacks finished basement area, a feature of the subject, suggesting this comparable would require an upward adjustment to make it more equivalent to the subject for this feature. The three comparables most similar to the subject in features are appellant's comparable #3 and board of review comparables #1 and #4. These most similar comparables sold for prices ranging from \$390,000 to \$479,000 or from \$157.89 to \$194.35 per square foot of

living area, including land. The subject's assessment reflects a market value of \$427,212 or \$174.80 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence the Board finds the assessment of the subject property as established by the board of review is correct 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

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: January 17, 2023



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

Lee Guo, by attorney:
Timothy C. Jacobs
Kovitz Shifrin Nesbit
175 North Archer Avenue
Mundelein, IL 60060

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085