



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

APPELLANT: Steven Ko  
DOCKET NO.: 20-03568.001-R-1  
PARCEL NO.: 15-36-403-009

The parties of record before the Property Tax Appeal Board are Steven Ko, 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 ***a reduction*** 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:** \$83,326  
**IMPR.:** \$121,314  
**TOTAL:** \$204,640

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 frame exterior construction with 3,411 square feet of living area. The dwelling was constructed in 1996. Features of the home include an unfinished basement, central air conditioning, a fireplace and a 630 square foot garage. The property has an 8,401 square foot site and is located in Riverwoods, 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 with the same assessment neighborhood code as the subject and located within .45 of a mile from the subject property. The comparables are improved with two-story dwellings of frame exterior construction ranging in size from 2,922 to 3,411 square feet of living area. The dwellings were built in 1995 or 1996. The comparables each have a basement, two of which are finished with a recreation room. Each

comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 464 to 642 square feet of building area. The comparables sold from May 2019 to April 2020 for prices ranging from \$470,000 to \$635,000 or from \$154.30 to \$207.05 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$204,640, which would reflect a market value of \$613,981 or \$180.00 per square foot of living area, including land, when using 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 \$211,102. The subject's assessment reflects a market value of \$634,130 or \$185.91 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 properties with the same assessment neighborhood code as the subject and located within .21 of a mile from the subject property. Board of review comparables #1, #2 and #3 are the same properties as the appellant's comparables #3, #4 and #2, respectively, which were previously described. Board of review comparables #4 and #5 have sites containing 10,096 and 12,482 square feet of land area, respectively. The comparables are improved with two story dwellings of frame exterior construction with either 3,118 or 3,181 square feet of living area. The dwellings were built in 1995 and 1997. The comparables each have a basement, one of which is finished with a recreation room. Each comparable has central air conditioning, one fireplace and either a 464 or 505 square foot garage. The comparables sold in June and September 2018 for prices of \$642,000 and \$670,000 or \$205.90 and \$210.63 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains six suggested comparable sales for the Board's consideration, three of which are common to both parties. The Board has given less weight to the appellant's comparables #1 and #4/board of review comparable #2 due to differences from the subject in dwelling size. Furthermore, the appellant's comparable #1 appears to be an outlier due to its considerably lower sale price in relation to the other comparable sales in the record. The Board has given reduced weight to board of review comparables #4 and #5 due to their sale dates occurring in 2018, less proximate in time to the assessment date at issue and thus less likely to be indicative of the subject's market value as of January 1, 2020.

The Board finds the best evidence of market value to be the parties' two remaining common comparables. The Board finds these comparables sold proximate in time to the assessment date

at issue and are identical to the subject in dwelling size. The comparables are also similar to the subject in location, design, age and features, except one comparable has a finished basement in contrast to the subject's unfinished basement, suggesting a downward adjustment would be required to make this comparable more equivalent to the subject. The comparables each sold in July 2019 for prices of \$615,000 and \$635,000 or for \$180.30 and \$186.16 per square foot of living area, including land. The subject's assessment reflects a market value of \$634,130 or \$185.91 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record both in terms of overall market value and on a price per square foot basis. However, after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is excessive. Therefore, based on this record the Board finds a reduction in the subject's assessment commensurate with the appellant's request is warranted.

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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