



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

APPELLANT: Yang Cao
DOCKET NO.: 20-03783.001-R-1
PARCEL NO.: 15-29-103-006

The parties of record before the Property Tax Appeal Board are Yang Cao, 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: \$30,583
IMPR.: \$95,919
TOTAL: \$126,502

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 2-story dwelling with wood siding exterior construction containing 2,372 square feet of living area.¹ The home was built in 1975 and has an effective age of 1981. Features of the home include a crawl space foundation, central air conditioning, and an attached garage with 440 square feet of building area. The property has a site of approximately 6,630 square feet of land area and is located in Buffalo Grove, Vernon Township, Lake County.

¹ The appellant submitted two grids, one of which disclosed that the subject property contains 2,172 square feet of living area and subject's site contains 7,345 square feet of land area. The board of review contends that the subject has 2,372 square feet of living area and a site containing 6,630 square feet of land area. The Board finds the evidence provided by the board of review to be more accurate as it contains the subject's property record card along with a schematic drawing and measurements of the subject dwelling.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a grid analysis with information on four comparable sales located within the same assessment neighborhood code as the subject property.² The comparables have sites ranging in size from 6,238 to 7,636 square feet of land area and are improved with 2-story dwellings of frame exterior construction that range in size from 2,030 to 2,496 square feet of living area. The dwellings were built in either 1975 or 1980 with comparable #4 having been built in 1975 with an effective age of 1981. The comparables each feature central air conditioning and a garage containing either 440 or 462 square feet of building area. Two comparables each have a fireplace. The comparables sold from June 2018 to May 2019 for prices ranging from \$280,000 to \$379,000 or from \$128.91 to \$159.78 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$109,892 which would reflect a market value of \$329,709 or \$139.00 per square foot of living area, land included, at 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 \$136,468. The subject's assessment reflects a market value of \$409,937 or \$172.82 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 located within the same assessment neighborhood code as the subject property. The comparables have parcels ranging in size from 7,200 to 9,190 square feet of land area and are improved with 2-story dwellings with wood siding exterior construction that range in size from 2,103 to 2,456 square feet of living area. The dwellings were built from 1975 to 1982. Each comparable features a basement, two with finished area. Each comparable also has central air conditioning and a garage ranging in size from 400 to 462 square feet of building area. Three comparables each have a fireplace. The comparables sold from February 2019 to September 2020 for prices ranging from \$415,000 to \$488,000 or from \$183.30 to \$215.55 per square foot of living area, including land. Based on this evidence, the board of review requested the assessment be sustained.

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 Board finds the parties submitted a total of nine comparable sales in support of their respective positions before the Property Tax Appeal Board. The Board gave less weight to the board of review comparables as each comparable has a basement, two with recreation rooms, dissimilar to the subject which is built on a crawl space foundation. The Board finds the

² The appellant submitted a second grid with information on three duplicate properties.

comparables submitted by the appellant to be more similar to the subject in terms of lacking a basement, as well as being similar to the subject in location, site size, age, design, and most features. However, three of the four comparables sold in 2018 which is less proximate in time to the January 1, 2020 assessment date at issue, thus requiring consideration of adjustments to these comparables in order to make them more equivalent to the subject. These four best comparables in the record sold from June 2018 to May 2019 for prices ranging from \$280,000 to \$379,000 or from \$128.91 to \$159.78 per square foot of living area, including land. The subject's assessment reflects a market value of \$409,937 or \$172.82 per square foot of living area, including land, which is above the range established by the best comparable sales in this record both in terms of overall value and on a per square foot basis. After considering adjustments to the best comparables in the record for differences from the subject, the Board finds that the appellant demonstrated by a preponderance of the evidence that the subject property is overvalued and, therefore, a reduction in the subject's assessment 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

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: February 21, 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

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