



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

APPELLANT: Jodie Hoang
DOCKET NO.: 20-05446.001-R-1
PARCEL NO.: 15-29-108-012

The parties of record before the Property Tax Appeal Board are Jodie Hoang, the appellant, 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: \$ 29,999
IMPR.: \$104,920
TOTAL: \$134,919

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 tri-level style single-family dwelling of vinyl siding exterior construction with 1,670 square feet of living area. The dwelling was constructed in 1977 and is approximately 43 years old. Features of the home include lower level with finished area, central air conditioning and a 484 square foot garage. The property has a 7,770 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends both overvaluation and lack of assessment equity concerning the improvement assessment as the bases of the appeal. In support of these arguments, the appellant submitted the Section V grid in the appeal petition with three equity comparables and a computer-generated grid analysis of six comparable properties, where the property marked "subject" is not the same property as the subject property on appeal in this matter and which includes the Section V properties as comparables #1, #4 and #5. The computer-generated grid

depicts a total of three recent sales and includes assessment equity data for all six of the properties.

With the appeal, the appellant submitted a letter contending that due to personal circumstances at the time, the subject property was purchased in a rush in November 2017 and resulted in "over paying" for the property at \$400,000 when an accurate value would have been about \$380,000 at most. The appellant further asserted that in the prior three year period, housing values in the subject's area have been decreasing.

Utilizing the computer-generated grid analysis and renumbering the mislabeled "subject" as comparable #6, the comparables have lots ranging in size from 7,770 to 10,890 square feet of land area. Each parcel has been improved with a tri-level style dwelling of wood siding exterior construction. The homes were built from 1976 to 1978 and each contain 1,670 square feet of living area. Features include a lower level, two of which have recreation rooms, central air conditioning, and a 484 square foot garage. Three of the dwellings each have a fireplace. Comparables #3, #4 and #6 sold from February 2018 to January 2020 for prices ranging from \$359,000 to \$380,000 or from \$214.97 to \$227.54 per square foot of living area, land included. The six comparables present improvement assessments ranging from \$93,101 to \$106,612 or from \$55.75 to \$63.84 per square foot of living area.

Based on this evidence and argument, the appellant requested a reduced total assessment of \$119,807 which would reflect a market value of \$359,457 or \$215.24 per square foot of living area, including land, when applying the statutory level of assessment of 33.33%. Furthermore, the requested reduced improvement assessment by the appellant is \$92,183 or \$55.20 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 \$134,919. The subject's assessment reflects a market value of \$405,284 or \$242.69 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. The subject has an improvement assessment of \$104,920 or \$62.83 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted a copy of a listing sheet depicting the recent sale of the subject along with a grid analysis of four comparable sales and a grid analysis of five equity comparables.

The listing sheet depicts that the subject property was sold in July 2021 after a marketing time of 7 days for a price of \$460,000.

The four comparable sales presented by the board of review consist of lots ranging in size from 6,630 to 7,770 square feet of land area which are each improved with a tri-level style dwelling of wood siding exterior construction. The homes were built from 1975 to 1983 and range in size from 1,480 to 1,752 square feet of living area. Each dwelling has a lower level with finished area and comparable #3 has a second finished lower level. Features include central air conditioning and a garage ranging in size from 440 to 484 square feet of building area. Three comparables each have a fireplace. The comparables sold from August 2017 to July 2020 for

prices ranging from \$412,000 to \$450,000 or from \$246.71 to \$283.72 per square foot of living area, including land.

The five equity comparables presented by the board of review consist of tri-level style dwellings of wood siding exterior construction. Board of review comparable #5 is the same comparable presented by the appellant as comparable #6. The homes were built from 1975 to 1978 and each contains 1,670 square feet of living area. Features include lower levels, four of which have finished area. Each home has central air conditioning and a 484 square foot garage. Four homes each have a fireplace. These comparables have improvement assessments ranging from \$105,533 to \$112,106 or from \$63.19 to \$67.13 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 appellant contends in part that 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.

As to the market value issue, the parties submitted seven comparable sales to support their respective positions before the Property Tax Appeal Board in addition to the board of review submitting documentation indicating that the subject property sold in July 2021 for \$460,000. The Property Tax Appeal Board has given little consideration to the subject's reported July 2021 sale price since the issue before the Board in this appeal is the best evidence in the record of the subject's estimated market value as of January 1, 2020. The sale of the subject occurred 19 months after the valuation date at issue herein and there are other sales contained within this record that are similar to the subject and with sale dates that were more proximate to the assessment date at issue. The Board has given reduced weight to appellant's comparable #3 as this sale occurred 22 months prior to the valuation date at issue. The Board has given reduced weight to board of review sales #3 and #4 due to the two finished lower levels and the smaller dwelling size, respectively, of these homes when compared to the subject.

The Board finds the best evidence of market value to be appellant's comparable sales #4 and #6 along with board of review comparable sales #1 and #2 as these properties are similar to the subject in design, age, size and most features. These most similar comparables sold from April 2019 to July 2020 for prices ranging from \$359,000 to \$422,500 or from \$214.97 to \$252.99 per square foot of living area, including land. The subject's assessment reflects a market value of \$405,284 or \$242.69 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and is further notably below the subject's reported subsequent sale price of \$460,000 in July 2021. Based on this evidence, the Board finds a reduction in the subject's assessment is not justified on ground of overvaluation.

In the alternative, the taxpayer contends assessment inequity as a basis of the appeal concerning the improvement. 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 improvement assessment is not warranted.

The parties submitted a total of ten equity comparables, one of which was common to both parties, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #2, #3, #5 and #6/board of review comparable #5 due to the lack of finished lower level area as compared to the subject's finished lower-level area.

The Board finds the best evidence in the record of assessment equity consists of appellant's comparables #1 and #4 along with board of review comparables #1, #2 and #3. These five comparables have improvement assessments that range from \$96,132 to \$112,106 or from \$57.56 to \$67.13 per square foot of living area. The subject's improvement assessment of \$104,920 or \$62.83 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering appropriate adjustments to the best comparables in the record 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 on inequity grounds.

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:

November 22, 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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