



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

APPELLANT: Shih-Che Hsu  
DOCKET NO.: 21-01267.001-R-1  
PARCEL NO.: 15-04-303-009

The parties of record before the Property Tax Appeal Board are Shih-Che Hsu, the appellant, by attorney Gregory Riggs, of Tax Appeals Lake County in Lake Zurich; 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:** \$23,218  
**IMPR.:** \$93,894  
**TOTAL:** \$117,112

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 2021 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 of wood siding exterior construction with 2,172 square feet of living area. The dwelling was built in 1975. Features of the home include a crawl space foundation, central air conditioning, one fireplace, and a 440 square foot attached garage. The property has an approximately 6,500 square foot site and is located in Vernon Hills, 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 0.71 of a mile from the subject property. The comparables have sites that range in size from 6,500 to 8,201 square feet of land area. The comparables are improved with 2-story dwellings of frame exterior construction with 2,223 or 2,347 square feet of living area. The dwellings were built from 1977 to 1979. Each comparable

has central air conditioning and an attached garage with 400 or 462 square feet of building area. Three comparables each have one fireplace. The properties sold from December 2019 to October 2020 for prices ranging from \$260,000 to \$330,000 or from \$110.78 to \$140.61 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$97,730, which would reflect a market value of \$293,219 or \$135.00 per square foot of living area, land included, 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 \$117,112. The subject's assessment reflects a market value of \$352,217 or \$162.16 per square foot of living area, land included, when using the 2021 three-year average median level of assessment for Lake County of 33.25% 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 with the same assessment neighborhood code as the subject and located within 0.59 of a mile from the subject property. The comparables are improved with 2-story dwellings of wood siding exterior construction ranging in size from 2,170 to 2,347 square feet of living area. The dwellings were built from 1976 to 1984. One comparable has an unfinished basement and four comparables each have a crawl space or a concrete slab foundation. Each comparable has central air conditioning and a garage ranging in size from 400 to 462 square feet of building area. Three comparables each have one fireplace. The comparables sold from December 2020 to December 2021 for prices ranging from \$360,000 to \$410,000 or from \$165.75 to \$174.69 per square foot of living area, land included. 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains nine suggested comparable sales for the Board's consideration. The Board gives reduced weight to the appellant's comparable #4 which appears to be an outlier with an improvement assessment that is considerably lower than the other comparables in the record. The Board also gives less weight to board of review comparable #5 which has a basement, unlike the subject.

The Board finds the best evidence of market value to be the parties' seven remaining comparables which are similar to the subject in location, age, dwelling size, and most features. The properties sold from February 2020 to November 2021 for prices ranging from \$300,000 to \$410,000 or from \$133.15 to \$174.69 per square foot of living area, land included. The subject's assessment reflects a market value of \$352,217 or \$162.16 per square foot of living area, land included, which falls within the range established by the best comparable sales in the record.

Based on the record and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's estimated market value as reflected by its assessment is not 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.



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Chairman



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Member



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Member

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Member



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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: June 27, 2023



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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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APPELLANT

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