



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

APPELLANT: Yougjian Liu
DOCKET NO.: 21-01323.001-R-1
PARCEL NO.: 15-24-301-002

The parties of record before the Property Tax Appeal Board are Yougjian Liu, 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: \$51,622
IMPR.: \$278,999
TOTAL: \$330,621

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 brick and Dryvit exterior construction with 6,059 square feet of living area. The dwelling was built in 1951 and has an effective year built of 1988. Features of the home include a walkout basement with finished area, central air conditioning, one fireplace, and a 972 square foot garage. The property has an approximately 36,542 square foot site and is located in Riverwoods, Vernon Township, Lake County.¹

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on five comparable sales with the same assessment neighborhood code as the subject property and located from 0.54 of a mile to 1.15 miles from the subject. The comparables have sites that range from 45,252 to 96,708 square feet of land area. The comparables are improved with 2-story dwellings of frame or brick and frame exterior

¹ The subject property is located in Riverwoods per the property record card presented by the board of review.

construction ranging in size from 5,469 to 6,412 square feet of living area. The dwellings were built from 1950 to 1990 with comparables #1, #2, and #3 having effective year built of 1989, 1973, and 1982, respectively. Three comparables are reported to have a basement with finished area. Each comparable has central air conditioning, one or three fireplaces, and a garage ranging in size from 640 to 1,110 square feet of building area. Comparable #4 has a hot tub and comparable #5 has a bath house. In handwritten notes, the appellant asserted that the subject was located on a busy road. The properties sold from February 2019 to May 2020 for prices ranging from \$604,000 to \$1,017,000 or from \$103.46 to \$161.12 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$287,405 which reflects a market value of \$862,301 or \$142.32 per square foot of living area, land included, when applying 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 \$330,621. The subject's assessment reflects a market value of \$994,349 or \$164.11 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 property and located from 0.05 of a mile to 1.26 miles from the subject property. The comparables have sites that range in size from 38,330 to 60,110 square feet of land area. The comparables are improved with 2-story dwellings of brick or wood siding exterior construction ranging in size from 5,247 to 7,116 square feet of living area. The homes were built from 1975 to 2007 with comparables #1 and #2 having effective years built of 1992 and 1978, respectively. Each comparable has a basement with finished area, central air conditioning, one to three fireplaces, and a garage ranging in size from 552 to 1,089 square feet of building area. Comparables #3 and #4 each have an inground swimming pool and a hot tub. The properties sold from March 2020 to April 2021 for prices ranging from \$900,000 to \$1,300,000 or from \$171.53 to \$196.64 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 parties submitted ten comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables which lack a basement foundation, unlike the subject, and/or have a 2019 sales date that is less proximate in time to the subject's January 1, 2021 assessment under appeal than the other comparables in this record. Furthermore, the appellant's comparable #4 features a hot tub and the appellant's comparable #5 has a bath house, unlike the subject. The Board gives less weight to board of review comparables #3 and #4 which each have

an inground swimming pool and a hot tub, which the subject lacks. The Board also gives reduced weight to board of review comparable #5 which differs from the subject in age/effective age.

The Board finds the best evidence of market value to be board of review comparables #1 and #2 which sold proximate in time to the subject's assessment date and are relatively similar to the subject in location, design, age/effective age, dwelling size, and most features. The properties sold in September 2020 and April 2021 for prices of \$1,206,000 and \$900,000 or \$196.64 to \$171.53 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$994,349 or \$164.11 per square foot of living area, land included, is bracketed on an overall market value basis by the two best comparable sales in this record but falls below them on a per square foot basis. Based on the record and after considering adjustments to the two 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.



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:

August 22, 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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