

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Steven Si

DOCKET NO.: 21-02080.001-R-1 PARCEL NO.: 15-16-304-028

The parties of record before the Property Tax Appeal Board are Steven Si, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Chicago; 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: \$47,852 **IMPR.:** \$123,740 **TOTAL:** \$171,592

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 2,549 square feet of living area. The dwelling was constructed in 1992 and is 29 years old. Features of the home include an unfinished basement, central air conditioning, and a 420 square foot garage. The property has an approximately 16,690 square foot site and is located in Buffalo Grove, 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 located within .75 of a mile from the subject property. The comparables have sites ranging in size from 8,896 to 11,492 square feet of land area that are improved with 2-story dwellings of wood siding exterior construction with 2,517 or 2,533 square feet of living area. The dwellings are 32 years old. The appellant reported that each comparable has an unfinished basement, central air conditioning, and a garage with 420 square feet of building area. Three comparables each have a fireplace. The comparables sold

from June 2019 to August 2020 for prices ranging from \$435,000 to \$465,000 or from \$172.82 to \$184.74 per square foot of living area, land included. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$171,592. The subject's assessment reflects a market value of \$516,066 or \$202.46 per square foot of living area, land included, when using the 2021 threeyear 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 located within .69 of a mile from the subject property. The board of review reported the comparables have sites ranging in size from 9,250 to 16,260 square feet of land area that are improved with 2-story dwellings of wood siding or wood siding and brick exterior construction ranging in size from 2,387 to 2,560 square feet of living area. The dwellings were built from 1988 to 1994. The comparables are reported to have basements, one of which has finished area. Four comparables have central air conditioning; four comparables each have a fireplace; and each comparable has a garage ranging in size from 420 to 484 square feet of building area. The comparables sold from July 2020 to August 2021 for prices ranging from \$515,000 to \$540,000 or from \$203.32 to \$226.23 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 parties submitted a total of nine comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparables #3 and #4 as their sale dates in 2019 are less proximate in time to the January 1, 2021 assessment date than the other sales in the record. The Board gives less weight to board of review comparable #4 which has finished basement area unlike the subject property.

The Board finds the best evidence of market value to be the remaining comparables in the record which are similar to the subject in location, age, dwelling size and most features. The properties sold from May 2020 to August 2021 for prices ranging from \$460,000 to \$540,000 or from \$181.60 to \$226.23 per square foot of living area, land included. The subject's assessment reflects a market value of \$516,066 or \$202.46 per square foot of living area, land included, which falls within the range established by the best comparable sales in this record both on overall value and price per square foot. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified.

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.

2	1. Fem
	Chairman
a de R	Robert Stoffen
Member	Member
Dan De Kinin	Swan Bokley
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:	July 18, 2023
	14:1016
	Mana

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 <u>PETITION AND EVIDENCE</u> 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

State of Illinois Property Tax Appeal Board William G. Stratton Building, Room 402 401 South Spring Street Springfield, IL 62706-4001

APPELLANT

Steven Si, by attorney: Robert Rosenfeld Robert H. Rosenfeld & Associates, LLC 33 North Dearborn Street Suite 1850 Chicago, IL 60602

COUNTY

Lake County Board of Review Lake County Courthouse 18 North County Street, 7th Floor Waukegan, IL 60085