



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

APPELLANT: Jung Moon
DOCKET NO.: 22-00320.001-R-1
PARCEL NO.: 15-18-302-008

The parties of record before the Property Tax Appeal Board are Jung Moon, the appellant, by attorney Andrew J. Rukavina, of The Tax Appeal Company in Mundelein; 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: \$69,138
IMPR.: \$254,716
TOTAL: \$323,854

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 2022 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 exterior construction with 6,198 square feet of living area. The dwelling was constructed in 1994. Features of the home include a partially finished basement, central air conditioning, four fireplaces, and two garages with a total of 1,313¹ square foot of building area. The property has an approximately 70,973 square foot site and is located in Long 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 five comparable sales located in the same neighborhood code as the subject property and within 0.46 of a mile from the subject. The comparables have sites

¹ Both parties disagree on the garage size total. The Board found the best description of the subject garages was found in the property record card which included a schematic drawing with measurements, provided by board of review, disclosing that the subject has two garages totaling 1,313 square feet of building area.

that range in size from 33,258 to 46,522 square feet of land area. The comparables are improved with 2-story dwellings of brick or frame exterior construction ranging in size from 5,291 to 8,054 square feet of living area. The homes were built from 1992 to 1998 with comparables #2 and #3 having effective ages of 1993 and 1997, respectively. The comparables each have a partially finished basement with one being a walkout. Each comparable has central air conditioning, three to five fireplaces, and a garage ranging in size from 655 to 1,455 square feet of building area. Comparables #1 and #3 have hot tubs. The comparables sold from July 2020 to June 2021 for prices ranging from \$622,000 to \$990,000 or from \$77.23 to \$138.99 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$267,603 which reflects a market value of \$802,889 or \$129.54 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 \$323,854. The subject's assessment reflects a market value of \$971,659 or \$156.77 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.²

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in the same neighborhood code as the subject property and within 0.36 of a mile from the subject. The comparables have sites that range in size from 33,960 to 42,960 square feet of land area. The comparables are improved with 2-story dwellings of brick or brick and Dryvit exterior construction ranging in size from 5,549 to 6,416 square feet of living area. The homes were built from 1994 to 2000. The comparables each have a basement with three having finished area. The comparables have central air conditioning, one or two fireplaces, and a garage ranging in size from 805 to 1,380 square feet of building area. Comparable #4 has an inground swimming pool and hot tub. The comparables sold from April 2021 to August 2022 for prices ranging from \$995,000 to \$1,350,000 or from \$155.08 to \$234.05 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 less weight to the appellant's comparables #1 through #4 and the board of review comparable #4. The appellant's comparables #1, #3, and #4 each have a 2020 sale date

² Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for tax year 2022.

occurring less proximate in time to the subject's January 1, 2022 assessment date under appeal than other comparables in this record. The appellant's comparable #2 is a substantially larger home than the subject. The board of review comparable #4 each has an inground swimming pool, a feature the subject lacks.

The Board finds the best evidence of market value to be the parties' remaining sales. The Board finds that these comparables sold proximate in time to the assessment date at issue and are relatively similar to the subject in location, design, age, dwelling size, and some features. The comparables sold from June 2021 to August 2022 for prices ranging from \$820,000 to \$1,350,000 or from \$129.54 to \$234.05 per square foot of living area, land included. The subject's assessment reflects a market value of \$971,659 or \$156.77 per square foot of living area, land included, which falls within the range established by the best comparable sales in this record. Based on this evidence and after considering the appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant failed to prove by a preponderance of the evidence that a reduction in the subject's assessment is justified based on overvaluation.

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: February 20, 2024



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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