



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

APPELLANT: Taesuk Song
DOCKET NO.: 22-00773.001-R-1
PARCEL NO.: 16-20-401-025

The parties of record before the Property Tax Appeal Board are Taesuk Song, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$54,368
IMPR.: \$136,319
TOTAL: \$190,687

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 two-story dwelling of brick and wood siding exterior construction with 2,725 square feet of living area. The dwelling was constructed in 1972 and is approximately 50 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace and a 440 square foot garage. The property has an approximately 12,160 square foot site and is located in Deerfield, West Deerfield 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 the same assessment neighborhood code as the subject property. The comparables have sites that range in size from 12,148 to 20,089 square feet of land area. The homes consist of two-story dwellings of brick exterior construction ranging in size from 3,226 to 3,601 square feet of living area. The dwellings are either 52 or 43 years old. Each comparable has a basement with three having

finished area, central air conditioning, one fireplace, and a garage ranging in size from 483 to 624 square feet of building area. The properties sold in March or April 2021 for prices ranging from \$595,000 to \$680,000 or from \$166.15 to \$188.84 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$166,270 which reflects a market value of \$498,860 or \$183.07 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 \$190,687. The subject's assessment reflects a market value of \$573,322 or \$210.39 per square foot of living area, land included, when using the 2022 three-year average median level of assessment for Lake County of 33.26% 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 the same assessment neighborhood code as the subject property. The board of review reported that comparables #1 through #4 have sites that range in size from 12,000 to 12,450 square feet of land area and that comparable #5 has "0" square feet of land area. The homes consist of one-story¹ or two-story dwellings of brick or brick and wood siding exterior construction ranging in size from 2,837 to 2,940 square feet of living area. The dwellings were built from 1967 to 1970 with comparable #3 having an effective age of 1984. The board of review reported comparable #1 has crawl space foundation and comparables #2 through #5 each have a basement with one having finished area. Each comparable has central air conditioning, one fireplace and a garage ranging in size from 418 to 550 square feet of building area. The properties sold from January 2021 to May 2022 for prices ranging from \$645,000 to \$780,000 or from \$219.39 to \$269.94 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 nine equity comparables for the Board's consideration. The Board gives less weight to appellant comparables and board of review comparables #1 and #2 due to differences in site size, larger dwelling size, foundation type and/or basement finish when compared to the subject that has an unfinished basement. The Board also gives less weight to the board of review comparable #5 which lacks sufficient descriptive data regarding the site size which is necessary for the Board to conduct a meaningful comparative market analysis of this comparable in relation to the subject property.

¹ The board of review's grid analysis described comparable #2 as being 1-story dwelling that has 2,871 square feet of above ground living area that exceeds the 1,111 square feet of ground floor living area, suggesting this comparable may be a part 2-story dwelling.

The Board finds the best evidence of market value to be the board of review comparables #3 and #4 which are more similar to the subject in location, dwelling size, age, foundation type and most features. These two comparables sold for \$679,000 and \$750,000 or \$233.49 and \$264.36 per square foot of living area, land included. The subject's assessment reflects a market value of \$573,322 or \$210.39 per square foot of living area, land included, which falls below the two best comparable sales in this record. Based on the record and after considering adjustments to the two best comparables for differences from the subject, the Board finds no reduction in the subject's estimated market value as reflected by its assessment is 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:

April 16, 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

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

APPELLANT

Taesuk Song, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld & Associates, LLC
40 Skokie Blvd
Suite 150
Northbrook, IL 60062

COUNTY

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