



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

APPELLANT: Woo Kim
DOCKET NO.: 22-00929.001-R-1
PARCEL NO.: 15-23-301-072

The parties of record before the Property Tax Appeal Board are Woo Kim, 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: \$38,838
IMPR.: \$119,451
TOTAL: \$158,289

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 is improved with a two-story dwelling of brick and frame construction containing 2,856 square feet of living area. The dwelling was built in 1995 and is approximately 27 years old. Features of the home include a slab foundation, central air conditioning, one fireplace, 2½ bathrooms, and an attached two-car garage with 400 square feet of building area. The property has a 10,454 square foot site located in Lincolnshire, 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 improved with two-story dwellings of brick exterior construction that range in size from 3,058 to 3,354 square feet of living area. The homes are 27 or 28 years old. Each property has a slab foundation, central air conditioning, one or two fireplaces, 2½ or 3½ bathrooms, and an attached garage ranging in size from 400 to 480

square feet of building area. The comparables have sites ranging in size from 7,840 to 10,890 square feet of land area. These properties are in the subject's neighborhood and from approximately .06 to .38 of a mile from the subject property. The sales occurred from November 2020 to December 2021 for prices ranging from \$350,000 to \$510,000 or from \$108.26 to \$152.06 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$121,023.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$158,289. The subject's assessment reflects a market value of \$474,914 or \$166.29 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on three comparable sales improved with two-story dwellings of brick and frame construction ranging in size from 3,125 to 3,468 square feet of living area. The homes were built in 1993 and 1995. Each comparable has a slab foundation, central air conditioning, one fireplace, 2½ bathrooms, and an attached garage with either 480 or 483 square feet of building area. These properties have sites ranging in size from 6,098 to 9,148 square feet of land area. The comparables are in the same neighborhood as the subject and from approximately .12 to .39 of a mile from the subject property. The sales occurred from September 2021 to March 2022 for prices ranging from \$510,000 to \$625,000 or from \$163.20 to \$180.22 per square foot of living area, including land.

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.

Of the seven sales submitted by the parties, the Board gives less weight to appellant's comparable sales #3 and #4 as these properties sold in November 2020, approximately 13 months prior to the assessment date at issue, and not as proximate in time to January 1, 2022, as the best sales in this record. The remaining sales submitted by the parties are similar to the subject in location, style, age, and features, however, each property is improved with a home that is from approximately 9% to 21% larger than the subject dwelling, which would indicate downward adjustments for size would be appropriate. Nevertheless, these comparables sold from January 2021 to March 2022 for prices ranging from \$420,000 to \$625,000 or from \$128.52 to \$180.22 per square foot of living area, including land. The two comparables most similar to the subject in dwelling size and sold within one month of the January 1, 2022 assessment date, are appellant's comparable sale #2 and board of review comparable sale #1.

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

Each of these comparables sold for \$510,000 or for \$152.06 and \$163.20 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$474,914 or \$166.29 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and is well supported by the two sales most similar to the subject in dwelling size, which both sold for prices greater than the overall market value reflected by the subject's assessment but less on a square foot basis, which is appropriate considering each dwelling is larger than the subject dwelling. Based on this evidence 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.



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: March 26, 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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