



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

APPELLANT: Xiaofeng Xu
DOCKET NO.: 22-02054.001-R-1
PARCEL NO.: 11-28-306-009

The parties of record before the Property Tax Appeal Board are Xiaofeng Xu, the appellant, by attorney Ronald Kingsley of Lake County Real Estate Tax Appeal, LLC in Hawthorn Woods, 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: \$40,422
IMPR.: \$133,015
TOTAL: \$173,437

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 3,321 square feet of living area. The dwelling was built in 2001. Features of the home include a full unfinished basement, central air conditioning, one fireplace, 2½ bathrooms, and an attached garage with 623 square feet of building area. The property has a 14,531 square foot site located in Vernon Hills, Libertyville 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 improved with two-story dwellings of brick and frame construction that range in size from 2,746 to 3,734 square feet of living area. The homes were built in 2001. Each property has an unfinished basement, central air conditioning, 2½ or 3½ bathrooms, and an attached garage ranging in size from 430 to 623 square feet of building area. Comparables #1 through #4 have one fireplace. These properties

have sites ranging in size from 10,453 to 11,268 square feet of land area. The comparables are in the same neighborhood as the subject property from approximately .03 to .18 of a mile from the subject. The sales occurred from March 2020 to May 2022 for prices ranging from \$400,000 to \$612,000 or from \$119.40 to \$222.87 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$164,927.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$173,437. The subject's assessment reflects a market value of \$520,363 or \$156.69 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 four comparable sales with comparables #1 through #3 being the same properties as appellant's comparables #2, #3 and #4, respectively. Board of review comparable #4 is composed of a two-story dwelling of frame construction containing 3,607 square feet of living area. The home was built in 2001 and has an effective construction date of 2008. Features of the home include an unfinished basement, central air conditioning, 3½ bathrooms, and an attached garage with 643 square feet of building area. The property is in the same neighborhood and approximately .04 of a mile from the subject with a 17,822 square foot site. The comparable sold in July 2021 for a price of \$727,131 or \$201.59 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.

The record contains six sales submitted by the parties to support their respective positions with three comparables being common to both parties. The comparables are similar to the subject in location, style, age, and most features. However, the Board gives less weight to appellant's comparables #1, #2 and #3 as well as board of review comparables #1 and #2, which includes two common sales, as these properties sold from March to July 2020, not as proximate in time to the assessment date as the best sales in this record. The Board finds the best evidence of market value to be appellant's comparable sales #4 and #5 and board of review comparable sales #3 and #4, which includes a common sale, as these properties sold most proximate in time to the assessment date. These three comparables sold from April 2021 to May 2022 for prices ranging from \$571,000 to \$727,131 or from \$192.39 to \$222.87 per square foot of living area, including land. The subject's assessment reflects a market value of \$520,363 or \$156.69 per square foot of living area, including land, which is below the range established by the best comparable sales in

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.

this record. 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

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

APPELLANT

Xiaofeng Xu, by attorney:
Ronald Kingsley
Lake County Real Estate Tax Appeal, LLC
40 Landover Parkway
Suite 3
Hawthorn Woods, IL 60047

COUNTY

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