



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

APPELLANTS: William & Kyung Lee
DOCKET NO.: 22-22406.001-R-1
PARCEL NO.: 01-22-105-021-0000

The parties of record before the Property Tax Appeal Board are William & Kyung Lee, the appellants, by attorney Brian P. Liston of the Law Offices of Liston & Tsantilis, P.C. in Chicago; and the Cook 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 **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$22,948
IMPR.: \$188,051
TOTAL: \$210,999

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants timely filed the appeal from a decision of the Cook 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, traditional style dwelling of masonry exterior construction with 8,996 square feet of living area. The dwelling is approximately 16 years old. Features of the home include a full walkout basement with finished area, central air conditioning, four fireplaces, a four-car garage and an inground swimming pool.¹ The property has a 1.32-acre site and is located in Barrington, Barrington Township, Cook County. The subject is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted an appraisal estimating the subject property had a market value of

¹ The appellants' appraiser disclosed the subject walkout basement and an inground swimming pool, which was not refuted by the board of review.

\$1,875,000 as of January 1, 2022. The appraisal was prepared by Nicholas Gonio, a Certified Residential Real Estate Appraiser. The property rights appraised were fee simple and the intended use of the appraisal is for ad valorem tax appeal purposes. The appraiser stated in the supplemental addendum that the subject property was inspected on January 12, 2023, and an extraordinary assumption was made that the subject was in the same condition on January 1, 2022, as it was on the date of inspection. The appraiser considered the subject to be in good overall condition and the subject has good modernization for the subject market.

In estimating the subject's market value, the appraiser developed the sales comparison approach to value utilizing four comparable sales that are located from .90 to 1.78 miles from the subject property. The comparables have sites ranging in size from 1.43-acres to 5.47-acres of land area. The comparables are described as traditional style dwellings ranging in size from 7,412 to 9,351 square feet of living area and are from 14 to 77 years old. The comparables each have a full basement with finished area, one of which is an English style and three of which are walkouts. Each comparable has central air conditioning, from three to six fireplaces and either a four-car or a six-car garage. Comparable #1 has an inground swimming pool and a pool house. The comparables sold from March to September 2021 for prices ranging from \$1,530,000 to \$2,400,000 or from \$163.62 to \$310.36 per square foot of living area, including land. The appraiser applied adjustments to the comparables for differences when compared to the subject in site size, view, condition, room count, gross living area, basement finish and other features to arrive at adjusted sale prices ranging from \$1,766,925 to \$1,982,095. Based on the adjusted sale prices, the appraiser estimated the subject had a market value of \$1,875,000 as of January 1, 2022.

Based on this evidence, the appellants requested the subject's total assessment be reduced to \$187,500 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$210,999. The subject's assessment reflects a market value of \$2,109,990 or \$234.55 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment of the subject property, the board of review submitted information on three comparable sales that have the same assessment neighborhood code as the subject and property classification code as the subject. The board of review's comparable #2 is a second sale of the appellants' appraisal comparable #1. The comparables are located within the same block as the subject or within the subject's subarea, one of which is also along the same street as the subject property. The comparables have sites that range in size from 1.33-acres to 3-acres of land area. The comparables are improved with two-story dwellings of masonry exterior construction ranging in size from 7,733 to 9,361 square feet of living area. The dwellings are from 13 to 19 years old. The comparables each have a basement, two of which have finished area. Each comparable has central air conditioning, from three to seven fireplaces and either a three-car or a four-car garage. The comparables sold from August to November 2022 for prices ranging from \$2,430,000 to \$3,100,000 or from \$280.78 to \$331.16 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains an appraisal submitted by the appellants and three comparable sales submitted by the board of review to support their respective positions before the Property Tax Appeal Board.

The Board has given less weight to the appellants' appraiser's conclusion of value as the appraiser utilized comparables #1, #2 and #3 that are considerably smaller in dwelling size when compared to the subject, when other comparables more similar in dwelling size were provided by the board of review. Furthermore, the appraiser's comparables #2, #3 and #4 are located more than a mile away from the subject. Lastly, the appraiser's comparable #4 has a dwelling that is 61 years older than the subject dwelling. These factors undermine the credibility of the appellants' appraiser's conclusion of value.

The board of review provided three comparable sales for the Board's consideration. The Board has given less weight to board of review comparable #2 due to its smaller dwelling size when compared to the subject. The Board finds the best evidence of the subject's market value to be board of review comparables #1 and #3, which are overall most similar to the subject in location, dwelling size, design, age and some features, although comparable #1 has a substantially larger site size when compared to the subject and neither comparable was reported to have an inground swimming pool, like the subject. Nevertheless, these two comparables sold in August and November 2022 for prices of \$2,625,000 and \$3,100,000 or for \$280.78 and \$331.16 per square foot of living area, including land. The subject's assessment reflects a market value of \$2,109,990 or \$234.55 per square foot of living area, land included which is less than the two best comparable sales in the record both in terms of overall market value and on a price per square foot basis. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellants did not prove by a preponderance of the evidence that a reduction in the subject's assessment is warranted 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

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: August 19, 2025



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

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