



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

APPELLANT: Yong Won Noh
DOCKET NO.: 23-01985.001-R-1
PARCEL NO.: 14-02-404-025

The parties of record before the Property Tax Appeal Board are Yong Won Noh, the appellant, by attorney Kyle Gordon Kamego, 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: \$32,890
IMPR.: \$156,875
TOTAL: \$189,765

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 2023 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 exterior construction with 3,136 square feet of living area. The dwelling was constructed in 1987. Features of the home include an unfinished basement, 3 full bathrooms and 2 half-baths, central air conditioning, a fireplace and a 1,045 square foot garage. The property has a 53,526 square foot site and is located in Hawthorn Woods, Ela Township, Lake County.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located in the same assessment neighborhood code as the subject and within .14 of a mile from the subject. The data was further expanded by an additional grid analysis of the properties with details on other improvements on the respective parcels. The appellant's comparables consist of two-story dwellings of brick and frame exterior construction. The

dwelling were built from 1987 to 1989 and range in size from 3,061 to 3,812 square feet of living area. Each comparable has an unfinished basement, one of which is a walkout-style. Features include either 2½ or 3½ bathrooms, central air conditioning, one or three fireplaces and a garage ranging in size from 672 to 816 square feet of building area. Comparable #2 has an inground swimming pool and comparable #4 has a gazebo. The comparables have improvement assessments ranging from \$146,953 to \$164,391 or from \$42.57 to \$48.01 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$139,983 or \$44.64 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$189,765. The subject property has an improvement assessment of \$156,875 or \$50.02 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located in the same assessment neighborhood code as the subject and within .39 of a mile from the subject. The comparables consist of two-story dwellings of frame, brick or brick and frame exterior construction. The dwellings were built from 1987 to 2002 and range in size from 3,044 to 3,449 square feet of living area. Each comparable has an unfinished basement, either 3½ or 5 bathrooms, central air conditioning, one or two fireplaces and a garage ranging in size from 736 to 1,075 square feet of building area. The comparables have improvement assessments ranging from \$152,059 to \$190,265 or from \$49.63 to \$55.17 per square foot of living area.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1, #3 and #4, due to larger dwelling sizes when compared to the subject which range from approximately 11% to 22%. The Board has given reduced weight to board of review comparables #1 and #2, due to newer dwelling ages of 21 and 22 years old as compared to the subject that is 36 years old.

The Board finds the best evidence of assessment equity to be appellant's comparable #2 and board of review comparables #3 and #4, which present varying degrees of similarity to the

subject in age, bathroom count, dwelling size, fireplace count, and/or garage size when compared to the subject. In addition, appellant's comparable #2 has an inground swimming pool which is not a feature of the subject and would justify downward adjustment to make the property more equivalent to the subject. These three comparables have improvement assessments ranging from \$146,953 to \$156,569 or from \$48.01 to \$49.95 per square foot of living area. The subject's improvement assessment of \$156,875 or \$50.02 per square foot of living area falls slightly above the range established by the best comparables in this record. The Board finds the subject's slightly higher assessment appears to be justified as the subject has an additional half-bath when compared to the three best equity comparables along with the subject having a larger garage than all three of the best equity comparables in the record.

Based on this evidence and after considering appropriate adjustments to the best comparables to make them more equivalent to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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: _____

October 15, 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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