



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

APPELLANT: Kelly Oh
DOCKET NO.: 23-02097.001-R-1
PARCEL NO.: 16-29-303-026

The parties of record before the Property Tax Appeal Board are Kelly Oh, the appellant, 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: \$47,122
IMPR.: \$119,528
TOTAL: \$166,650

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 one-story dwelling of brick exterior construction with 1,600 square feet of living area. The dwelling is approximately 35 years old. Features of the home include a full basement with finished area, central air conditioning, a fireplace, and a 462 square foot garage. The property has a 9,225 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 three comparable sales improved with one-story dwellings of brick exterior construction that range in size from 1,446 to 1,707 square feet of living area. The homes are from 46 to 66 years old and have sites ranging in size from 8,840 to 18,000 square feet of land area. Each comparable has a full or partial basement with two having finished area, central air conditioning, a fireplace, and a garage ranging in size from 440 to 572 square feet of building area. The comparables have the same assessment neighborhood code as the subject and

are located within 0.39 of a mile from the subject property. The sales occurred in either October 2021 or August 2022 for prices ranging from \$377,500 to \$443,500 or from \$235.35 to \$306.71 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$140,122, which equates to a full value of \$420,408 or \$262.76 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$166,650. The subject's assessment reflects a market value of \$500,000 or \$312.50 per square foot of living area, land included, when applying the statutory level of assessments 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 one-story dwellings of brick or frame exterior construction that range in size from 1,446 to 2,283 square feet of living area. The board of review's comparable #2 is the same as the appellant's comparable #3. The homes are from 66 to 69 years old and have sites ranging in size from 7,980 to 9,480 square feet of land area. Each comparable has central air conditioning and a garage ranging in size from 273 to 572 square feet of building area, while two comparables have a basement with finished area and a fireplace. The comparables have the same assessment neighborhood code as the subject and are located within 0.40 of a mile from the subject property. The sales occurred from March 2022 to May 2023 for prices ranging from \$443,500 to \$730,700 or from \$305.39 to \$320.06 per square foot of living area, including land. The board of review requested confirmation of the subject's total assessment.

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 a total of five comparable sales, with one comparable being common to both parties, for the Board's consideration. The Board gives less weight to the board of review's comparable #3 due to differences from the subject in terms of dwelling size. The Board finds the best evidence of market value to be the remaining comparable sales, which are improved with dwellings that are relatively similar to the subject in location, style, and size, although adjustments to these comparables to account for differences age and in some features, such as finished basement area, would be needed to make them more equivalent to the subject. These most similar comparables are from 46 to 69 years old, range in size from 1,446 to 1,707 square feet of living area and were sold from October 2021 to May 2023 for prices ranging from

¹ Section 1910.50(c)(1) of the Board's procedural rules provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill. Admin. Code Section 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for the tax year 2023.

\$377,500 to \$510,000 or from \$235.35 to \$306.71 per square foot of living area, including land. The subject's assessment reflects a market value of \$500,000 or \$312.50 per square foot of living area, land included, which falls within the range established by the best comparable sales in this record on an overall basis and slightly outside the range on a per square foot basis. After considering adjustments to account for the subject dwelling's age when compared to the older comparables and other features, the subject's higher per square foot value is logical and 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:

November 19, 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

Kelly Oh
1163 Broadmoor place
Deerfield, IL 60015

COUNTY

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