



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

APPELLANT: Jang and In Ja Kim
DOCKET NO.: 23-02928.001-R-1
PARCEL NO.: 16-10-306-011

The parties of record before the Property Tax Appeal Board are Jang and In Ja Kim, the appellants, by attorney Donald T. Rubin, of Golan Christie Taglia LLP in Chicago; 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: \$68,757
IMPR.: \$201,796
TOTAL: \$270,553

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 2-story dwelling of brick exterior construction with 4,250 square feet of living area. The dwelling was constructed in 1999 and is approximately 24 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace, and a 588 square foot garage. The property has an approximately 18,035 square foot site and is located in Highwood, Moraine Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted information on three comparable sales that are located in the same neighborhood code as the subject property and within 0.08 of a mile from the subject. The comparables have sites ranging in size from 7,520 to 20,140 square feet of land area. The comparables are improved with 2-story dwellings of brick, Dryvit, or stone exterior construction ranging in size from 3,816 to 4,646 square feet of living area. The homes were built in either

1999 or 2000 and are either 23 or 24 years old. Each comparable has a basement, with the appellant noting that the finished basement area for each was "Unknown." Each comparable has central air conditioning, either one or two fireplaces and a garage that ranges in size from 546 to 635 square feet of building area. The comparables sold from January to June 2021 for prices ranging from \$650,000 to \$835,000 or from \$162.13 to \$179.72 per square foot of living area, land included. Based on this evidence, the appellants requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$270,553. The subject's assessment reflects a market value of \$811,740 or \$191.00 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.¹

As part of the evidence, the board review submitted a copy of the appellant's grid and noted that each of the appellant's comparables sold in 2021, in excess of 18 months prior to the subject's assessment date and noted that the board of review comparables sold within 13 months of this date.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales that are located in the same neighborhood code as the subject and within 0.40 of a mile from the subject property. The comparables have sites that range in size from 7,118 to 14,812 square feet of land area. The comparables are improved with 2-story dwellings of brick exterior construction ranging in size from 3,786 to 4,132 square feet of living area. The homes are each 23 years old. The comparables each have a basement, one of which has finished area. Each comparable has central air conditioning and a garage that ranges in size from 593 to 651 square feet of building area. Three comparables each have one fireplace. The comparables sold from December 2021 to September 2022 for prices ranging from \$760,000 to \$935,000 or from \$200.74 to \$226.28 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 seven suggested comparable sales for the Board's consideration. The Board has given less weight to the appellants' comparables which sold from January to June 2021, over 18 months prior to the subject's January 1, 2023, and are less proximate to this date given other

¹ Procedural rule Sec. 1910.50(c)(1) 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 Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has not published figures for tax year 2023.

sales available in this record. The Board also gives less weight to board of review comparable #3 which has basement finish, unlike the subject.

The Board finds the best evidence of market value to be board of review comparable sales #1, #2, and #4. The Board finds that these comparables sold proximate to the subject's assessment date at issue and are relatively similar to the subject in location, design/class, age, dwelling size, and some features. The comparables sold from December 2021 to August 2022 for prices ranging from \$760,000 to \$935,000 or from \$200.74 to \$226.28 per square foot of living area, land included. The subject's assessment reflects a market value of \$811,740 or \$191.00 per square foot of living area, land included, which falls within the range established by the best comparable sales in the record on an overall market value basis and below on a price per square foot basis. Therefore, based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellants did not prove by a preponderance of the evidence that the subject's estimated market value as reflected by its assessment is not supported 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: January 21, 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

AGENCY

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

APPELLANT

Jang and In Ja Kim, by attorney:
Donald T. Rubin
Golan Christie Taglia LLP
70 West Madison Street
Suite 1500
Chicago, IL 60602

COUNTY

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