



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

APPELLANT: Zuoxing Zheng
DOCKET NO.: 20-04078.001-R-1
PARCEL NO.: 15-21-206-016

The parties of record before the Property Tax Appeal Board are Zuoxing Zheng, the appellant, by attorney Eric Feldman of Eric Feldman & Assoc. P.C. 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: \$38,123
IMPR.: \$165,917
TOTAL: \$204,040

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 2020 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 9,150 square foot site improved with a two-story dwelling of wood siding exterior construction containing 3,526 square feet of living area built in 1996. Features of the home include a partial basement that is partially finished with a 938 square foot recreation room, central air conditioning, 2½ bathrooms and an attached garage with 813 square feet of building area. The property is located in Buffalo Grove, Vernon 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 ranging in size from 3,001 to 3,881 square feet of living area. The homes were built in 1997 or 1998. Each property has a full basement with three having finished area ranging in size from 1,292 to 1,467 square feet, central air conditioning, and an attached garage ranging in size from 483 to 704 square feet of building area. Four comparables have one or two fireplaces. These

properties have sites ranging in size from 10,450 to 16,990 square feet of land area. The comparables have the same assessment neighborhood code as the subject and are located from approximately .19 to .38 of one mile from the subject property. The sales occurred from January 2019 to May 2020 for prices ranging from \$508,000 to \$587,000 or from \$144.38 to \$169.28 per square foot of living area, land included. The appellant requested the subject's total assessment be reduced to \$184,014.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$204,040. The subject's assessment reflects a market value of \$612,917 or \$173.83 per square foot of living area, land included, when using the 2020 three-year average median level of assessment for Lake County of 33.29% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with two-story dwellings ranging in size from 3,189 to 3,881 square feet of living area.¹ The homes were built in 1996 or 1998. Each property has a full basement with one having 1,514 square feet of finished area, central air conditioning, one or two fireplaces, and an attached garage ranging in size from 506 to 691 square feet of building area. These properties have sites ranging in size from 10,020 to 13,500 square feet of land area. The comparables have the same assessment neighborhood code as the subject and are located from approximately .17 to .36 of one mile from the subject property. The sales occurred from August 2019 to September 2020 for prices ranging from \$620,000 to \$695,000 or from \$179.08 to \$195.99 per square foot of living area, land included.

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 nine comparable sales submitted by the parties to support their respective contentions of the correct assessment. The comparables are similar to the subject in location, dwelling style and age. Each comparable has a slightly larger site than the subject property. The Board gives less weight to appellant's comparables #1, #2, #4 and #5 due to differences from the subject dwelling in size as they are from approximately 15% smaller to 10% larger than the subject dwelling. The Board gives less weight to board of review comparables #3 and #4 due to differences from the subject dwelling in size as each is approximately 10% smaller or larger than the subject home. The Board finds the best evidence of market value to be appellant's comparable sale #3 and board of review comparables #1 and #2 as these three properties have dwellings most similar to the subject in size. Appellant's comparable #3 has a larger basement with more finished area suggesting a downward adjustment for these features would be appropriate. Conversely, appellant's comparable #3 has a smaller garage than the subject

¹ Board of review comparables #3 and #5 are duplicates.

suggesting an upward adjustment for this amenity would be warranted. Board of review comparables #1 and #2 would require upward adjustments for the lack of finished basement area and having a smaller garage than the subject. These two comparables would require downward adjustments due to the fact each has one fireplace while the subject lacks this feature. These three comparables sold for prices ranging from \$585,000 to \$630,000 or from \$155.71 to \$194.26 per square foot of living area, including land. The subject's assessment reflects a market value of \$612,917 or \$173.83 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and well supported after considering the necessary adjustments. Based on this evidence the Board finds the assessment of the subject property as established by the board of review is correct 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: July 19, 2022



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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