



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

APPELLANT: Sunny Shi
DOCKET NO.: 21-01387.001-R-1
PARCEL NO.: 15-21-202-002

The parties of record before the Property Tax Appeal Board are Sunny Shi, the appellant, by attorney Gregory Riggs, of Tax Appeals Lake County in Lake Zurich; 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: \$30,470
IMPR.: \$272,772
TOTAL: \$303,242

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 2021 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 and stucco exterior construction with 5,069 square feet of living area. The dwelling was constructed in 2017. Features of the home include a basement with finished area,¹ central air conditioning, a fireplace and a 780 square foot garage. The property has an approximately 20,040 square foot site and is located in Prairie View, Vernon 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 located from 0.27 of a mile to 2.60 miles from the subject property. The comparables have sites that range in size from 21,344 to 123,275 square feet of land area and are improved with two-story dwellings of frame or brick

¹ The Board finds the best description of the subject's basement was found in Section III – Description of Property and the appellant's grid analysis, both of which report the subject to have finished basement area.

and frame exterior construction that range in size from 3,956 to 6,304 square feet of living area. The dwellings were built from 1958 to 2015 with the oldest dwelling having an effective year built of 1985. Two comparables have a basement with one having finished area and one comparable has a concrete slab foundation.² Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 660 to 1,282 square feet of building area. The properties sold from March 2019 to November 2020 for prices ranging from \$660,000 to \$935,000 or from \$146.63 to \$192.11 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$253,425 which reflects a market value of \$760,351 or \$150.00 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$303,242. The subject's assessment reflects a market value of \$912,006 or \$179.92 per square foot of living area, land included, when using the 2021 three-year average median level of assessment for Lake County of 33.25% 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 located from 0.86 of a mile to 1.87 miles from the subject property. The comparables have sites that range in size from 9,150 to 30,930 square feet of land area and are reportedly improved with one-story or two-story dwellings³ of brick, wood siding or brick and wood siding exterior construction that range in size from 4,015 to 4,821 square feet of living area. The homes were built from 2006 to 2015. Each comparable has a basement with one having finished area. Each dwelling has central air conditioning, one or five fireplaces and a garage ranging in size from 632 to 1,032 square feet of building area. The properties sold from April 2020 to December 2021 for prices ranging from \$672,000 to \$1,075,000 or from \$165.48 to \$222.98 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 parties submitted seven comparable sales for the Board's consideration, five of which are located more than one mile from the subject property. The Board gives less weight to appellant comparables #1 and #3 which sold in 2019, less proximate in time to the January 1, 2021 assessment date than other comparables in the record. Furthermore, appellant comparable #3 has

² Additional property characteristics for the appellant comparables #2 and #3 were found in the Multiple Listing Service (MLS) sheets.

³ Board of review comparable #4 has ground floor area of 1,721 square feet and above ground floor area of 4,061 square feet suggesting the dwelling is part two-story.

a concrete slab foundation in contrast with the subject's finished basement. The Board gives less weight to appellant comparable #2 along with board of review comparables #3 and #4 which differ from the subject in dwelling size, site size and/or foundation type when compared to the subject.

The Board finds the best evidence of market value to be board of review comparables #1 and #2 which are most similar to the subject in age, site size, design, dwelling size and other features. These two best comparables sold in May and December 2021 for of \$915,000 and \$1,075,000 or for \$197.92 and \$222.98 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$912,006 or \$179.92 per square foot of living area, including land, which falls below the two best comparable sales in this record. After considering appropriate adjustments to the comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not warranted.

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:

August 22, 2023



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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