



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

APPELLANT: Sunny Shi
DOCKET NO.: 21-01531.001-R-1
PARCEL NO.: 15-15-303-075

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: \$34,956
IMPR.: \$84,032
TOTAL: \$118,988

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 part one-story and part two-story dwelling¹ of wood siding exterior construction with 1,932 square feet of living area. The dwelling was constructed in 2003. Features of the home include a basement with finished area, central air conditioning, one fireplace and a 420 square foot garage. The property is located in Lincolnshire, Vernon Township, Lake County.

¹ Both parties' grid analysis depict the subject property to have a one-story height, however, the board of review's grid reports ground floor area of 1,054 square feet and above ground floor area of 1,932 square feet which suggests the subject is part two-story in design. Additionally, the Property Information sheet for the subject, submitted by the board of review, includes a sketch of the subject which depicts the dwelling as part one-story and part two-story in design.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales located on the same street as the subject property. The comparables are reported to be improved with one-story dwellings² of frame exterior construction ranging in size from 2,297 to 2,569 square feet of living area. The dwellings were built in 2003. Each comparable has a basement, one of which has finished area. Each dwelling has central air conditioning, one fireplace and a 420 square foot garage. The properties sold from March to July 2020 for prices ranging from \$322,000 to \$360,000 or from \$135.46 to \$145.41 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$102,423 which reflects a market value of \$307,300 or \$159.06 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 \$118,988. The subject's assessment reflects a market value of \$357,859 or \$185.23 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 three comparable sales located within 0.20 of a mile from the subject property. The comparables are improved with one-story or two-story dwellings³ of wood siding exterior construction ranging in size from 1,932 to 2,297 square feet of living area. The homes were built in 2003 or 2004. Each comparable has a basement, with one having finished area. Each dwelling has central air conditioning, one fireplace and a 420 square foot garage. The properties sold from December 2019 to March 2022 for prices of \$355,000 and \$425,000 or from \$183.75 to \$192.39 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. The Board gives less weight to appellant comparable #4 which differs from the subject in dwelling size. The Board gives less weight to board of review comparables #1 and #3 which sold in either 2019 or 2022, less proximate to the January 1, 2021 assessment date than other properties in the record.

² The appellant's grid analysis disclosed each of its comparables has first and second floor area, suggesting the dwellings are part two-story in design.

³ The board of review's grid analysis disclosed its comparables #1 and #3 have above ground floor area that is larger than the reported ground floor area, suggesting these dwellings are part two-story in design.

The Board finds the best evidence of market value to be appellant comparables #1, #2 and #3 along with board of review comparable #2 which sold proximate to the lien date at issue and are more similar to the subject in location, age, design, dwelling size and some other features. However, three of these best comparables lack a finished basement like the subject, suggesting an upward adjustment is needed to make these properties more equivalent to the subject. These best comparables sold from May 2020 to May 2021 for prices ranging from \$322,000 to \$425,000 or from \$140.18 to \$192.39 per square foot of living area, including land. The subject's assessment reflects a market value of \$357,859 or \$185.23 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. After considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is justified and 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:

May 21, 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

Sunny Shi, by attorney:
Gregory Riggs
Tax Appeals Lake County
830 West IL Route 22
Suite 286
Lake Zurich, IL 60047

COUNTY

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