



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

APPELLANT: Sarzu Shah  
DOCKET NO.: 21-04008.001-R-1  
PARCEL NO.: 11-28-413-027

The parties of record before the Property Tax Appeal Board are Sarzu Shah, the appellant, by attorney Ronald Kingsley, of Lake County Real Estate Tax Appeal, LLC in Lake Forest, 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:** \$32,995  
**IMPR.:** \$75,726  
**TOTAL:** \$108,721

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 is improved with a two-story townhouse with wood siding exterior construction that contains 1,894 square feet of living area. The home was built in 2004. Features of the dwelling include a concrete slab foundation, central air conditioning, 2½ bathrooms, and an attached garage with 400 square of building area. The property is in Vernon Hills, Libertyville Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales improved with two-story townhouses of frame construction that range in size from 1,712 to 1,956 square feet of living area. The homes were built in 1999. Each comparable has central air conditioning and an attached garage ranging in size from 395 to 412 square feet of building area. The comparables have 2½ or 3 bathrooms and three comparables have one fireplace. The comparables are located from .59 to

.62 of a mile from the subject and in a different neighborhood from the subject. The sales occurred from March 2020 to January 2021 for prices ranging from \$266,000 to \$300,000 or from \$147.78 to \$160.63 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$97,847.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$108,721. The subject's assessment reflects a market value of \$326,980 or \$172.64 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 improved with one-story or two-story townhouses of wood siding exterior construction that range in size from 1,860 to 2,166 square feet of living area.<sup>1</sup> The homes were built in 2001 or 2004. Each comparable has a slab foundation, central air conditioning and an attached garage with either 400 or 402 square feet of building area. The comparables have 2 or 2½ bathrooms. The comparables are located from .05 to .56 of a mile from the subject with two being in the same neighborhood as the subject property. The sales occurred from November 2020 to December 2021 for prices ranging from \$323,000 to \$370,000 or from \$170.82 to \$174.17 per square foot of living area, including land.

### **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 information on seven comparable sales to support their respective positions. The Board gives less weight to board of review comparable #1 due to differences from the subject in style. The remaining comparables have varying degrees of similarity to the subject property. Three of the appellant's comparables have a fireplace, whereas the subject has no fireplace, suggesting each would require a downward or negative adjustment to make them more equivalent to the subject property for this amenity. The appellant's comparables are approximately five years older than the subject which may necessitate a slightly positive adjustment for age. The six comparables sold for prices ranging from \$266,000 to \$370,000 or from \$147.78 to \$174.17 per square foot of living area, including land. The overall best comparable is board of review comparable #2, which is located in the same subdivision and within .05 of a mile from the subject property. This comparable sold in December 2021 for a price of \$360,000 or \$174.17 per square foot of living area, land included. The subject's assessment reflects a market value of \$326,980 or \$172.64 per square foot of living area,

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<sup>1</sup> The board of review stated in its analysis that comparable #2 had a story height of 1, however, it also described the property as having a ground floor area of 1,034 square feet and an above ground living area of 2,067 square feet indicating the townhome is a two-story dwelling.

including land, which is within the range established by the best comparable sales in this record and well supported by the overall best comparable sale in this record in terms of location, age, and features. Based on this evidence 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:

December 19, 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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COUNTY

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