



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

APPELLANT: Zishan Alam
DOCKET NO.: 22-01898.001-R-1
PARCEL NO.: 11-10-303-035

The parties of record before the Property Tax Appeal Board are Zishan Alam, the appellant, by attorney Ronald Kingsley of Lake County Real Estate Tax Appeal, LLC in Hawthorn Woods, 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: \$61,537
IMPR.: \$231,241
TOTAL: \$292,778

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 2022 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 dwelling of frame construction containing 4,344 square feet of living area. The dwelling was constructed in 2018. Features of the home include an unfinished basement, central air conditioning, one fireplace, four bathrooms, and an attached garage with 771 square feet of building area. The property has a .541-acre or 23,566 square foot site located in Libertyville, Libertyville 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 improved with two-story dwellings of frame or frame and brick exterior construction that range in size from 3,553 to 3,993 square feet of living area. The homes were built in 2006.¹ Each comparable has an unfinished basement,

¹ The appellant submitted a copy of the Multiple Listing Service (MLS) listing for comparable #3 disclosing the home had been rehabbed in 2010 and the property is ½ of a duplex.

central air conditioning, one fireplace, and 3½ to 5½ bathrooms. Comparables #1 and #3 each have finished attic area and a detached garage with 440 square feet of building area. Comparable #2 has two attached garages with a combined 716 square feet of building area. These properties have sites ranging in size from 6,739 to 11,360 square feet of land area and are located from approximately 1.74 to 2.23 miles from the subject property. The sales occurred from January to July 2021 for prices ranging from \$675,000 to \$795,000 or from \$189.98 to \$210.22 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$286,675.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$292,778. The subject's assessment reflects a market value of \$878,422 or \$202.21 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In support of its contention of the correct assessment the board of review submitted information on five comparable sales improved with two-story dwellings of frame or frame and brick construction that range in size from 3,705 to 3,912 square feet of living area. The homes were built from 2004 to 2014. Each comparable has an unfinished basement, central air conditioning, one or two fireplaces, 3½ to 5½ bathrooms, and an attached garage ranging in size from 454 to 854 square feet of building area. These properties have sites ranging in size from 7,200 to 25,339 square feet of land area and are located from approximately .78 to 1.73 miles from the subject property. The sales occurred from January 2021 to March 2022 for prices ranging from \$782,450 to \$1,129,900 or from \$200.89 to \$300.13 per square foot of living area, including land.

A comment on the grid analysis submitted by the board of review indicated appellant's comparable #2 is an attached home – not a single dwelling.

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 eight comparables to support their respective positions. The Board gives less weight to appellant's comparables #1 and #3 as these two properties are least similar to the subject in dwelling size in the record and the evidence also indicates comparable #3 is ½ of a duplex, unlike the subject's detached single-family dwelling.³ The

² Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2022.

³ It appears the board of review was in error in identifying appellant's comparable #2 as being an attached home.

Board finds the remaining comparables are smaller than the subject dwelling ranging in size from 3,705 to 3,993 square feet of living area, suggesting each would require an upward adjustment for size. Additionally, appellant's comparable #2 and board of review comparables #2 through #5 were built from 2004 to 2007 and are from approximately 11 to 14 years older than the subject dwelling, again suggesting that upward adjustments to these comparable for age would be appropriate. Finally, appellant's comparable #2 and board of review comparables #2 through #5 have sites ranging in size from 8,701 to 11,360 square feet of land area, significantly smaller than the subject's site with 23,566 square feet of land area, indicating that upward adjustments for land area may be proper. Nevertheless, these comparables sold for prices ranging from \$782,450 to \$1,129,900 or from \$199.10 to \$300.13 per square foot of living area, including land. Board of review comparable #1 is most similar to the subject property in location, age, and land area and sold for \$1,112,000 or \$300.13 per square foot of living area, including land. The subject's assessment reflects a market value of \$878,422 or \$202.21 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and significantly below the comparable most similar to the subject in location, age and land area. Based on this evidence, and after considering the suggested adjustments, the Board finds the assessment of the subject property as established by the board of review is correct 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: April 16, 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

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