



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

APPELLANT: Syed Kazmi  
DOCKET NO.: 23-02280.001-R-1  
PARCEL NO.: 13-26-101-010

The parties of record before the Property Tax Appeal Board are Syed Kazmi, the appellant, by attorney James P. Boyle, of Crane and Norcross LLC 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:** \$71,752  
**IMPR.:** \$528,436  
**TOTAL:** \$600,188

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 2023 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 2-story dwelling of brick exterior construction with 9,510 square feet of living area. The dwelling was constructed in 2007 and is approximately 16 years old. Features of the home include a basement with finished area, central air conditioning, four fireplaces, two attached garages with a combined 2,774 square feet of area, a 550 square foot carport and a shed. The property has an approximately 4.85-acre or 211,043 square foot site and is located in Barrington, Cuba 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 in the same assessment code as the subject property. The comparables have sites that range in size from 107,826 to 280,090 square feet of land area and are improved with 2-story dwellings of brick exterior construction ranging in size from 4,614 to 5,429 square feet of living area. The dwellings range in age from

16 to 31 years old. Each comparable has a basement with finished area, central air conditioning, two to five fireplaces and a garage ranging in size from 770 to 1,121 square feet of building area. The properties sold from February to December 2021 for prices ranging from \$789,000 to \$875,000 or from \$161.17 to \$171.00 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$524,392 which reflects a market value of \$1,573,333 or \$165.44 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 \$600,188. The subject's assessment reflects a market value of \$1,800,744 or \$189.35 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>1</sup>

The board of review, through Cuba Township, critiqued the appellant's comparables arguing the dwelling sizes were from 4,081 to 4,896 square feet smaller than the subject property and that these dwellings have a quality grade of good or average when compared to the subject's quality grade of "Exc." To support this argument the board of review submitted a grid analysis of the appellant's comparables which disclosed quality ratings for the properties and that comparables #1 and #2 each have an inground swimming pool. The board of review depicted the location of its comparables as either unincorporated Barrington, North Barrington or in Barrington Hills and asserted each has a quality rating of "Exc" like the subject.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales located from 0.75 of a mile to 2.14 miles from the subject property. The comparables have sites that range in size from 153,767 to 341,946 square feet of land area and are improved with 1.5-story or 2-story dwellings of brick or brick and frame exterior construction ranging in size from 7,418 to 8,186 square feet of living area. The homes were built from 1937 to 2009. Each comparable has a basement with finished area, central air conditioning, three to eight fireplaces and a garage ranging in size from 564 to 2,634 square feet of building area. Comparables #2 and #3 each feature a barn. The properties sold from March 2021 to August 2023 for prices ranging from \$1,775,000 to \$2,950,000 or from \$239.28 to \$360.37 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.

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<sup>1</sup> Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2023.

The parties submitted eight comparable sales for the Board's consideration. The Board gives less weight to appellant comparables #1 and #2 which feature an inground swimming pool unlike the subject and are both more than 40% smaller in dwelling size relative to the subject. The Board gives less weight to appellant comparable #3 which is more than 50% smaller in dwelling size and 15 years older in age when compared to the subject. The Board gives less weight to board of review comparables #3, #4 and #5 which range from 12 to 70 years older in age when compared to the subject.

On this limited record, the Board finds the best evidence of market value to be board of review comparables #1 and #2 which are more similar to the subject in age, dwelling size, site size and some other features. However, these two best comparables present varying degrees of similarity to the subject in location, design and garage amenity suggesting adjustments are needed to make these properties more equivalent to the subject. These two comparables sold in October 2021 and August 2023 for prices of \$1,775,000 and \$1,825,000 or \$239.28 and \$245.46 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$1,800,744 or \$189.35 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record on an overall market value basis and falls below the two best comparables on a per square foot basis. Accepted real estate theory provides that, all things being equal, as the size of a property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. Given the subject's larger dwelling size a lower per square foot value appear logical. Therefore, 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: \_\_\_\_\_

October 15, 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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