



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

APPELLANT: SCI Shared Resources, LLC
DOCKET NO.: 23-02695.001-C-2
PARCEL NO.: 07-21-200-054

The parties of record before the Property Tax Appeal Board are SCI Shared Resources, LLC, the appellant, by attorney Jabari Jackson, of O'Keefe Lyons & Hynes, 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: \$131,634
IMPR.: \$200,312
TOTAL: \$331,946

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 1-story funeral home building of brick and concrete block exterior construction with 5,320 square feet of building area. The building was constructed in 1986 and is approximately 37 years old. Features include a basement with finished area, a parking lot, landscaping/lighting, and signage. The property has a 102,322 square foot site, a land-to-building ratio of 19.23:1, and is located in Gurnee, Warren Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$560,000 as of January 1, 2023. The appraisal was prepared by Arshad Jaffery, an associate real estate appraiser trainee, and Edward V. Kling, a certified general real estate appraiser, for ad valorem tax purposes. The appraisers developed the cost and sales comparison approaches to value but did not develop the income approach to value as the appraisers stated funeral home facilities like the

subject are generally single-user owner-occupied buildings. The appraisers examined trends in the funeral industry, including cremation and burial rates from 2005 to 2020 and projected rates from 2025 to 2035, which depict decreasing rates of burial and increasing rates of cremation. The appraisers identified the subject as a special use property that would require significant renovation to be adapted to another use and would likely be replaced. The appraisers concluded the highest and best use of the subject as vacant is for retail development and as improved is the subject's existing use.

Under the cost approach, the appraisers estimated \$410,000, rounded, or \$4.00 per square foot of land area, for the subject's land based on four comparable land sales with prices ranging from \$3.86 to \$6.64 per square foot of land area. For the subject building, the appraisers calculated a replacement cost new of \$815,413 using Marshall & Swift Valuation Services costs for a Class C Average Quality Funeral Home. The appraisers deducted accrued depreciation of 80% or \$652,330 to arrive at a depreciation building value of \$163,083, to which the appraisers added the site value of \$410,000 and the depreciated value of site improvements of \$71,100 to conclude a value for the subject of \$640,000, rounded, under the cost approach.

Under the sales comparison approach, the appraisers selected four comparable sales located in Villa Park, Joliet, Frankfort, and Rock Island. The comparables are improved with 1-story or 2-story funeral home buildings ranging in size from 3,000 to 10,236 square feet of building area that are reported to range in age from 19 to 177 years old.¹ The parcels range in size from 7,278 to 118,919 square feet of land area and the comparables have land-to-building ratios from 1.21:1 to 14.46:1. The comparables sold from July 2018 to November 2020 for prices ranging from \$400,000 to \$872,850 or from \$60.81 to \$133.33 per square foot of building area, including land. A grid analysis of adjustments to the comparables depicts adjustments for location, building size, land-to-building ratio, and age/condition to all four comparables and for construction quality to two comparables, whereas a narrative description of the adjustments includes inconsistencies in adjustments to comparable #2 for location and to comparable #4 for age/condition. The appraisers concluded a value for the subject of \$560,000, rounded, under the sales comparison approach.

In reconciliation, the appraisers gave most weight to the sales comparison approach, stating it was reliable given sales within the subject's market area. The appraisers concluded a value for the subject of \$560,000 as of January 1, 2023.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$331,946. The subject's assessment reflects a market value of \$995,938 or \$187.21 per square foot of building area, land included, when using the statutory level of assessment of 33.33%.²

¹ The appraisers reported inconsistent ages for comparables #3 and #4.

² Section 1910.50(c)(1) of the Board's procedural rules 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. Adm. Code § 1910.50(c)(1). As of the development of this Final Administrative Decision, the Department of Revenue has not published figures for tax year 2023.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales located in Park Ridge, Arlington Heights, Worth, Franklin Park, and Chicago. The comparables are improved with funeral home buildings ranging in size from 6,051 to 17,260 square feet of building area, three of which range in age from 64 to 95 years old. The parcels range in size from 15,002 to 80,251 square feet of land area and the comparables have land-to-building ratios from 1.61:1 to 8.03:1. The comparables sold from August 2021 to June 2024 for prices ranging from \$1,450,000 to \$2,600,000 or from \$118.77 to \$355.31 per square foot of building area, including land.

The board of review submitted a brief contending that the appraisal sales were older sales and located outside the subject's market area. The board of review argued its sales were more recent and located in competing market areas. Based on this evidence, the board of review requested the subject's assessment be sustained.

In written rebuttal, the appellant argued the board of review did not present any review appraisal or other expert opinion to challenge the appraised value conclusion. The appellant contended the appraisal is the best evidence of market value compared to the unadjusted raw sales presented by the board of review.

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 appellant presented an appraisal and the board of review presented five comparable sales in support of their respective positions before the Board. The Board gave less weight to the appraised value conclusion due to the selection of older sales when more recent sales were available as demonstrated by the board of review's comparables. Moreover, the appraisers described inconsistent adjustments to the comparables and gave most weight to the sales comparison approach due to sales being located within the subject's market area after making adjustments to two of the four comparables for location outside the subject's market area. For these reasons, the Board finds the appraisal states a less credible and/or reliable opinion of value and will instead consider the raw sales data in the appraisal and presented by the board of review.

The record contains a total of nine comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #2, #3, and #4, which sold less proximate in time to the January 1, 2023 assessment date than the other sales in this record. The Board also gives less weight to the board of review's comparables #2 and #4, for which no age was provided.

The Board finds the best evidence of market value to be the appraisal sale #1 and the board of review's comparables #1, #3, and #5, which sold more proximate in time to the assessment date but have varying degrees of similarity to the subject in building size, age, location, and site size. These comparables are substantially older buildings than the subject and have significantly smaller

sites than the subject, suggesting upward adjustments to these comparables for age and site size would be needed to make them more equivalent to the subject. These comparables are also larger buildings than the subject, with two being substantially larger buildings, suggesting downward adjustments for building size would be needed. These most similar comparables sold for prices ranging from \$790,000 to \$2,600,000 or from \$130.95 to \$355.31 per square foot of building area, including land. The subject's assessment reflects a market value of \$995,938 or \$187.21 per square foot of building area, including land, which is within the range established by the best comparables in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, 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: _____

February 18, 2025



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

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