



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

APPELLANT: Arif Qureshi
DOCKET NO.: 24-00589.001-R-1
PARCEL NO.: 06-28-407-029

The parties of record before the Property Tax Appeal Board are Arif Qureshi, the appellant, by attorney Arden Edelcup, 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: \$16,846
IMPR.: \$87,833
TOTAL: \$104,679

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 2024 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 two-story dwelling of vinyl siding exterior construction with 2,091 square feet of living area. The dwelling is 26 years old. Features of the home include a full 1,041 square foot unfinished basement, 2½ bathrooms, central air conditioning, and a 420 square foot garage. The property has a 7,292 square foot site and is located in Hainesville, Avon Township, Lake County.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located in the same neighborhood code as the subject and from .02 to .26 of a mile from the subject. Each comparable consists of a two-story dwelling of vinyl siding exterior construction. The homes range in age from 26 to 28 years old, and each home contains either 2,157 or 2,171 square feet of living area. Each comparable has an unfinished basement of 1,125

square feet of building area. Features include 2½ bathrooms, central air conditioning, and a 420 square foot garage. The comparables have improvement assessments ranging from \$87,248 to \$89,022 or from \$40.45 to \$41.19 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$84,104 or \$40.22 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$104,679. The subject property has an improvement assessment of \$87,833 or \$42.01 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables located in the same neighborhood code as the subject and within .15 of a mile from the subject. Each comparable consists of a two-story dwelling of vinyl siding exterior construction. The homes were 24 or 25 years old, and contain either 1,826 or 2,157 square feet of living area. Each comparable has a full unfinished basement of 972 or 1,125 square feet of building area, 2½ bathrooms, central air conditioning, and a 420 square foot garage. Two comparables each have a fireplace. The comparables have improvement assessments ranging from \$80,800 to \$91,074 or from \$41.75 to \$44.25 per square foot of living area.

Based on the foregoing, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 a total of seven suggested equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparable #3, which is more than 12% smaller than the subject dwelling and the other comparables in the record.

The Board finds the best evidence of assessment equity to be the appellant's along with the board of review comparables #1 and #2, each of which are located in the subject's neighborhood and within 3% of the subject in dwelling size, featuring full unfinished basements, air conditioning feature, and identical garage sizes. The only differences between these six best comparables and the subject are slightly varying ages, small differences in dwelling size and two comparables each have a fireplace, which is not a feature of the subject. Each of these best comparables necessitate adjustments for superior dwelling sizes compared to the subject. Two comparables necessitated downward adjustments in fireplace amenity to make the properties more equivalent

to the subject. The best six comparables have improvement assessments ranging from \$87,248 to \$91,074 or from \$40.45 to \$42.22 per square foot of living area. The subject's improvement assessment of \$87,833 or \$42.01 per square foot of living area falls within the range of the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of living area basis, which the Board finds to be logical given necessary adjustments for differences in age, basement size, and/or fireplace amenity when compared to the subject. Finally, the Board finds accepted real estate theory, referred to as the economies of scale, 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. Thus, it would be expected, all things being equal, that the subject would present a higher per-square-foot assessment given its smaller dwelling size relative to the best six comparables with larger dwelling sizes.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

Based on the foregoing and after considering appropriate adjustments to the best comparables in order to make them more equivalent to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed 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: _____

October 21, 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

AGENCY

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