



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

APPELLANT: Zhiqi Guo  
DOCKET NO.: 24-01820.001-R-1  
PARCEL NO.: 15-21-206-042

The parties of record before the Property Tax Appeal Board are Zhiqi Guo, 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:** \$44,555  
**IMPR.:** \$225,649  
**TOTAL:** \$270,204

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 brick with frame exterior construction with 3,516 square feet of living area. The dwelling was constructed in 2007 and is approximately 17 years old. Features of the home include a basement with 1,657 square feet of finished area, 2 full bathrooms, 2 half-baths, central air conditioning, and a 400 square foot garage. The property has a 4,356 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on five comparable sales, none of which are located in the same neighborhood code as the subject. The comparables are from 1.17 to 2-miles from the subject. The parcels range in size from 9,100 to 12,226 square feet of land area which are each improved with a two-story dwelling of frame exterior construction. The dwellings are each 36 years old

and range in size from 2,816 to 3,405 square feet of living area. Each comparable has a basement, three of which have finished area ranging in size from 596 to 1,113 square feet. Features include 2½ or 3 bathrooms, central air conditioning, a fireplace, and a garage ranging in size from 405 to 441 square feet of building area. The comparables sold from March 2023 to June 2024 for prices ranging from \$535,500 to \$680,000 or from \$180.42 to \$212.62 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment of \$215,626 which reflects a market value of \$646,943 or \$184.00 per square foot of living area, including land, using 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 \$270,204. The subject's assessment reflects a market value of \$810,693 or \$230.57 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>1</sup>

In support of its contention of the correct assessment, the board of review submitted information on two comparable sales located in the same neighborhood code, one the same street, and within .12 of a mile from the subject. The parcels each contain 3,920 square feet of land area which are each improved with either a one-story and a two-story dwelling of frame or brick and frame exterior construction. The dwellings are 13 and 17 years old, respectively, and contain 3,226 and 3,067 square feet of living area, respectively. Each comparable has a basement, one of which has 1,210 square feet of finished area. Features include 2½ bathrooms, central air conditioning, a fireplace, and a 439 square foot garage. The comparables sold in July 2022 and August 2023 for prices of \$690,000 and \$779,900 or for \$224.98 and \$241.75 per square foot of living area, including land.

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

### **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 a total of seven suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables, due to their distances of over a mile from the subject and their ages of 36 years old as compared to the subject that is 17 years old.

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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 issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2024.

The Board finds the best market value evidence in the record consists of the board of review comparables, which are each similar to the subject in location, age, exterior construction, and several features. Each of these best comparables necessitate upward adjustments for one less half-bath when compared to the subject. Each dwelling is smaller than the subject with smaller basements as well necessitating adjustments. Both comparables need varying upward adjustments for basement finish, one for having less finished area and one for lacking basement finish. Each comparable necessitates downward adjustments for fireplace amenities and for larger garages than the subject. These best comparables sold in July 2022 and August 2023 for prices of \$690,000 and \$779,900 or for \$224.98 and \$241.75 per square foot of living area, including land. The subject's assessment reflects a market value of \$810,693 or \$230.57 per square foot of living area, including land, which is above the best comparable sales in this record in terms of overall value and bracketed by the best sales on a per-square-foot of living area basis. The Board finds the subject's higher overall value to be logical given that the subject has a larger lot size, larger dwelling size, larger basement and more finished basement area making the subject overall superior to the two best comparable sales in the record.

Based on this evidence and after considering appropriate adjustments to the best comparable sales in the record for differences from the subject to make the comparables more equivalent to the subject, the Board finds a reduction in the subject's assessment is not justified on grounds of overvaluation.

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: \_\_\_\_\_

January 20, 2026



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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