



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

APPELLANT: Sheng Li
DOCKET NO.: 21-01273.001-R-1
PARCEL NO.: 14-26-203-004

The parties of record before the Property Tax Appeal Board are Sheng Li, the appellant, by attorney Gregory Riggs 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: \$90,188
IMPR.: \$215,784
TOTAL: \$305,972

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 2021 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 exterior construction with 5,418 square feet of living area. The dwelling was constructed in 1999. Features of the home include a basement, central air conditioning, two fireplaces and a 1,070 square foot garage. The property has an approximately 2.118-acre site¹ and is located in Long Grove, Ela 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 that have the same assessment neighborhood code as the subject and are located .18 of a mile to 1.88 miles from the subject property. The comparables have sites that range in size from approximately 1.378 to 13.439 acres of land area. The comparables are improved with two-story dwellings of frame, brick or

¹ The property record card provided by the board of review disclosed that the subject site has approximately 1.292 acres of lake front with the remaining land of lakes/lake bottom.

brick and frame exterior construction ranging in size from 5,226 to 6,564 square feet of living area. The dwellings were built from 1976 to 2008 with comparable #3 having a reported effective age of 1980. The comparables each have a basement, one of which is a look-out and one is a walk-out. Each comparable has central air conditioning, one to five fireplaces and a garage ranging in size from 820 to 1,546 square feet of building area. Comparable #5 has an inground swimming pool. The comparables sold from April 2019 to February 2021 for prices ranging from \$465,000 to \$950,000 or from \$79.88 to \$152.96 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$305,972. The subject's assessment reflects a market value of \$920,217 or \$169.84 per square foot of living area, land included, when using the 2021 three-year average median level of assessment for Lake County of 33.25% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on five comparable sales that are located from 1.31 to 1.89 miles from the subject property, one of which has the same assessment neighborhood code as the subject. The comparables have sites that range in size from approximately .952 to 1.998 acres of land area. The board of review reported the comparables are improved with one-story² or two-story dwellings of brick, wood siding or brick and wood siding exterior construction ranging in size from 4,414 to 5,865 square feet of living area. The dwellings were built from 1993 to 2013 with comparable #5 having a reported effective age of 1996. The comparables each have a basement, one of which is a walk-out. Each comparable has central air conditioning, one to three fireplaces and a garage ranging in size from 759 to 1,207 square feet of building area. Two comparables each have an inground swimming pool. The comparables sold from October 2020 to November 2021 for prices ranging from \$930,000 to \$1,250,000 or from \$179.03 to \$236.56 per square foot of living area, including land.

The board of review argued that the appellant's comparable #1 is over 1,000 square feet larger than the subject dwelling, the appellant's comparable #3 is a foreclosure sale, the appellant's comparable #4 is a foreclosure auction sale and the appellant's comparable #5 is a sale from April 2019. The board of review also noted that the subject property's high land value is reflective of the lakefront location.

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

² The board of review's comparable #4 has a ground floor area of 1,515 square feet and an above ground area of 5,284 square feet, suggesting the dwelling is part two-story.

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 record contains ten suggested comparable sales for the Board's consideration. The Board finds none of the comparables are truly similar to the subject due to their sales occurring less proximate to the lien date at issue or due to significant differences from the subject in location, site size, dwelling size, age and/or features. Nevertheless, the Board has given less weight to the appellant's comparables #1, #2 and #3, as well as board of review comparables #1 and #4 which are less similar to the subject in age or dwelling size than are the other comparables in the record. The Board has also given less weight to the appellant's comparable #5 due to its sale date occurring 20 months prior to the assessment date issue and is thus less likely to be indicative of the subject's market value as of January 1, 2021.

The Board finds the best evidence of market value to be the parties' remaining comparables which sold proximate in time to the assessment date at issue and are most similar to the subject in dwelling size, design and age. However, the comparables have varying degrees of similarity to the subject in location, site size and features, suggesting adjustments would be required to make them more equivalent to the subject. Nevertheless, these four comparables sold from June 2020 to November 2021 for prices ranging from \$661,000 to \$1,150,000 or from \$125.71 to \$204.34 per square foot of living area, including land. The subject's assessment reflects a market value of \$920,217 or \$169.84 per square foot of living area, including land, which falls within the range established by the most similar comparable sales in the record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds no reduction in the subject's assessment is 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:

September 19, 2023



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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