



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

APPELLANT: Gregory Jenko  
DOCKET NO.: 19-04548.001-R-1  
PARCEL NO.: 16-04-407-015

The parties of record before the Property Tax Appeal Board are Gregory Jenko, the appellant, by attorney Ronald Kingsley of Lake County Real Estate Tax Appeal, LLC in Lake Forest; 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:** \$93,733  
**IMPR.:** \$184,151  
**TOTAL:** \$277,884

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 2019 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 wood siding exterior construction with 3,403 square feet of living area. The dwelling was constructed in 1990. Features of the home include an unfinished basement, central air conditioning, two fireplaces and an 882 square foot garage. The property has a 26,400 square foot site and is located in Lake Forest, West Deerfield Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales with the same assessment neighborhood code as the subject and located within .65 of a mile from the subject property. The comparables have sites that range in size from 20,060 to 22,200 square feet of land area. The comparables are improved with 2-story dwellings of brick, wood siding or brick and wood siding exterior construction ranging in size from 3,397 to 3,796 square feet of living area. The

dwelling were built from 1956 to 1983 with the oldest comparable having a reported effective age of 2004. The comparables each have a basement, two of which are finished with a recreation room. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 484 to 712 square feet of building area. Comparable #4 has an inground swimming pool. The properties sold from June 2018 and August 2019 for prices ranging from \$668,500 to \$1,150,000 or from \$188.42 to \$302.95 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$243,857, which would reflect a market value of \$731,644 or \$215.00 per square foot of living area, including land, when 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 \$277,884. The subject's assessment reflects a market value of \$844,889 or \$248.28 per square foot of living area, land included, when using the 2019 three-year average median level of assessment for Lake County of 32.89% 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 properties with the same assessment neighborhood code as the subject and located within .43 of a mile from the subject property. The board of review's comparables #2 and #5 are the same properties as the appellant's comparables #2 and #3, respectively. No sales data was provided for board of review comparable #3 to address the appellant's overvaluation argument, thus this comparable will not be further addressed in the analysis. The four comparables sales have sites that range in size from 20,270 to 59,240 square feet of land area and are improved with 1.5-story or 2-story dwellings of brick, wood siding or brick and wood siding exterior construction ranging in size from 3,360 to 3,536 square feet of living area. The dwellings were built from 1944 to 1983 with the oldest comparable having a reported effective age of 1975. The board of review reported that one comparable has a concrete slab foundation and three comparables each have an unfinished basement. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 552 to 1,328 square feet of building area. Comparable #1 has a greenhouse. The properties sold from June 2018 to August 2019 for prices ranging from \$730,000 to \$1,350,000 or from \$211.82 to \$396.24 per square foot of living area, including land.

The board of review argued that the subject's 2019 and 2020 values are lower than the subject's listing and sale price in 2020 as shown in the attached Multiple Listing Service (MLS) listing sheet, which revealed the subject was listed for sale in June 2020 for a price of \$949,000 and subsequently reduced to \$924,000 prior to its sale in July 2020 for a price of \$877,500.

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 record contains a total of six suggested comparable sales for the Board's consideration, as two comparables were common to both parties. The Board has given less weight to the appellant's comparable #4 and board of review comparables #1 and #4 due to their older ages when compared to the subject dwelling. Furthermore, the appellant's comparable #4 has an inground swimming pool, unlike the subject and board of review comparable #1 has a considerably larger site size and dissimilar concrete slab foundation when compared to the subject.

The Board finds the best evidence of market value to be the parties' remaining comparables, which includes two common sales. These comparables are relatively similar to the subject in location, dwelling size, design and some features. However, the Board finds all of the comparables have smaller site sizes when compared to the subject and the comparable dwellings are from 7 to 17 years older than the subject dwelling suggesting upward adjustments would be required to make the comparables more equivalent to the subject. The properties sold in June 2018 and August 2019 for prices ranging from \$668,500 to \$755,000 or from \$188.42 to \$222.25 per square foot of living area, including land. The subject's assessment reflects a market value of \$844,889 or \$248.28 per square foot of living area, including land, which falls above the range established by the best comparable sales in the record but appears to be justified given its superior age and larger site size. Based on this record and after considering adjustments to the comparables for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its 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:

August 23, 2022



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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