



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

APPELLANT: Robert DeNapoli  
DOCKET NO.: 20-04212.001-R-1  
PARCEL NO.: 12-31-200-004

The parties of record before the Property Tax Appeal Board are Robert DeNapoli, 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:** \$139,228  
**IMPR.:** \$127,306  
**TOTAL:** \$266,534

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 2020 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 1.5-story dwelling of brick exterior construction with 2,901 square feet of living area. The dwelling was constructed in 1903. Features of the home include an unfinished basement, central air conditioning, three fireplaces and a 3,708 square foot detached garage. The property has an approximately 66,650 square foot site and is located in Lake Forest, Shields 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 located within 0.62 of a mile from the subject property. The comparables have sites that range in size from 20,168 to 49,123 square feet of land area and are improved with either a 1.75-story or a 2-story dwelling that range in size from 2,921 to 3,361 square feet of living area. The dwellings were built from 1964 to 1987. Each comparable has a basement, central air conditioning, one fireplace and a garage ranging in

size from 506 to 660 square feet of building area. The properties sold from May 2019 to June 2020 for prices ranging from \$530,000 to \$674,500 or from \$178.57 to \$230.91 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$235,924 which reflects a market value of \$707,843 or \$244.00 per square foot of living area, land included, when applying 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 \$266,534. The subject's assessment reflects a market value of \$800,643 or \$275.99 per square foot of living area, land included, when using the 2020 three-year average median level of assessment for Lake County of 33.29% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located from 0.26 of a mile to 1.68 miles from the subject property. The comparables have sites that range in size from 11,970 to 48,380 square feet of land area and are improved with 2-story dwellings of brick or stucco exterior construction that range in size from 2,878 to 3,357 square feet of living area. The homes were built from 1900 to 1968 with comparable #3 having an effective age of 1939. Each comparable has a basement with finished area, central air conditioning, one fireplace and a garage ranging in size from 506 to 759 square feet of building area. The properties sold from October 2019 to December 2020 for prices ranging from \$750,000 to \$915,000 or from \$223.41 to \$317.93 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

### **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 seven comparable sales for the Board's consideration. The Board finds that neither of the parties' comparables are particularly similar to the subject, nevertheless, the Board gives less weight to appellant comparable #1 which is least similar to the subject in age, and to board of review comparable #3 which is least similar to the subject in location and site size.

The Board finds the best evidence of market value to be appellant comparables #2, #3 and #4 along with board of review comparables #1 and #2 which are similar to the subject in location and dwelling size but are dissimilar to the subject in age, design, site size, garage size and other features. These comparables sold from May 2019 to October 2020 for prices ranging from \$560,000 to \$799,000 or from \$185.19 to \$266.96 per square foot of living area, including land. The subject's assessment reflects a market value of \$800,643 or \$275.99 per square foot of living area, including land, which falls above the range established by the best comparable sales in this

record. Given the subject's larger site size and substantially larger garage size when compared to the best comparables in the record, a higher overall market value and per square foot value appear to be logical. Therefore, 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.

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Chairman



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Member



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Member



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Member



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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: March 21, 2023



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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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COUNTY

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