



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

APPELLANT: Susan Jennings  
DOCKET NO.: 21-01050.001-R-1  
PARCEL NO.: 15-12-404-011

The parties of record before the Property Tax Appeal Board are Susan Jennings, the appellant, by attorney Eric Feldman of Eric Feldman & Assoc. P.C. in Chicago; and the Lake County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds ***a reduction*** 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:** \$103,032  
**IMPR.:** \$121,406  
**TOTAL:** \$224,438

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 3,439 square feet of living area. The dwelling was constructed in 1970. Features of the home include a basement, central air conditioning, a fireplace and a 506 square foot garage. The property has a 41,820 square foot site and is located in Lake Forest, 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 that have the same assessment neighborhood code as the subject and are located within .28 of a mile from the subject property. The comparables have sites that range in size from 31,360 to 56,190 square feet of land area. The comparables are improved with two-story dwellings of brick, wood siding or wood siding and brick exterior construction ranging in size from 2,449 to 3,720 square feet of living area. The dwellings were built from 1969 to 1974 with comparables #2, #3 and #5 having reported

effective ages of 1975 or 1976. The comparables each have a basement, four of which have finished area. Each comparable has central air conditioning, one or two fireplaces and a garage ranging in size from 399 to 700 square feet of building area. The comparables sold from April 2020 to July 2021 for prices ranging from \$445,000 to \$670,000 or from \$161.34 to \$222.54 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$218,529, which would reflect a market value of \$655,653 or \$190.65 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 \$250,109. The subject's assessment reflects a market value of \$752,208 or \$218.73 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 have the same assessment neighborhood code as the subject and are located within .34 of a mile from the subject property. The board of review's comparable #1 is the same property as the appellant's comparable #1. The comparables have sites that range in size from 30,490 to 56,190 square feet of land area. The comparables are improved with two-story dwellings of brick, wood siding or wood siding and brick exterior construction ranging in size from 2,496 to 3,047 square feet of living area. The dwellings were built from 1961 to 1972 with comparable #3 having a reported effective age of 1964. The comparables each have a basement, three of which have finished area. Each comparable has central air conditioning, a fireplace and a garage ranging in size from 462 to 528 square feet of building area. The comparables sold from April 2020 to August 2021 for prices ranging from \$445,000 to \$740,000 or from \$164.33 to \$281.37 per square foot of living area, including land. The board of review submitted a copy of the listing sheet for comparable #2 associated with the sale. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains nine suggested comparable sales for the Board's consideration, as one sale was common to the parties. The Board has given less weight to the appellant's comparables #1 and #5, as well as board of review comparables #1, #2, #4 and #5, which includes the common comparable, due to their smaller dwelling sizes when compared to the subject.

The Board finds the best evidence of market value to be the parties' remaining comparable sales, which are similar to the subject in location, dwelling size, design, age and some features, except all have finished basement area. The comparables sold from April 2020 to July 2021 for prices

ranging from \$525,000 to \$700,000 or from \$161.34 to \$229.73 per square foot of living area, including land. The subject's assessment reflects a market value of \$752,208 or \$218.73 per square foot of living area, including land, which falls above the range established by the best comparable sales in this record in terms of overall market value but within the range on a price per square foot basis. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is excessive, due to the subject's lack of finished basement area. Therefore, based on this record the Board finds a 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:

May 16, 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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