



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

APPELLANT: Pietro Gennuso
DOCKET NO.: 21-04215.001-R-1
PARCEL NO.: 07-17-307-029

The parties of record before the Property Tax Appeal Board are Pietro Gennuso, 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: \$21,283
IMPR.: \$103,519
TOTAL: \$124,802

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 wood frame exterior construction with 2,370 square feet of living area. The dwelling was constructed in 1993. Features of the home include a basement with finished area,¹ central air conditioning, a fireplace and a 440 square foot garage. The property has a 13,939 square foot site and is located in Gurnee, Warren 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 located in the same neighborhood code as the subject and within .59 of a mile from the subject. The comparable parcels range in size from 11,326 to 15,769 square feet of land area and are each improved with a two-story dwelling

¹ Descriptive data for the subject not provided by the appellant was drawn from the subject's property record card submitted by the board of review.

of wood frame exterior construction. The homes were built between 1992 and 1994 and range in size from 2,176 to 2,398 square feet of living area. Each home has a basement, none of which are reported to be finished, central air conditioning, a fireplace and a garage ranging in size from 400 to 440 square feet of building area. The appellant further asserted that comparable #5 was a "recent rehab." In support of this, the appellant submitted a copy of the Multiple Listing Service (MLS) data sheet depicting that the property was rehabbed in 2012 and also indicating the basement has finished area. The comparable properties sold from July 2020 to April 2021 for prices ranging from \$284,900 to \$367,500 or from \$127.00 to \$158.55 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment of \$116,118 which reflects a market value of \$348,389 or \$147.00 per square foot of living area, including land, 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 \$124,802. The subject's assessment reflects a market value of \$375,344 or \$158.37 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, where board of review comparable #3 is the same property as the appellant's comparable #4, but reporting finished basement area which the appellant did not refute with any rebuttal submission. The comparable sales are located in the same neighborhood code as the subject and within .43 of a mile from the subject. The comparable parcels range in size from 10,000 to 13,500 square feet of land area and are each improved with a two-story dwelling of wood frame exterior construction. The homes were built between 1992 and 1994 and range in size from 2,196 to 2,612 square feet of living area. Each home has a basement, two of which have finished area. Features include central air conditioning, a fireplace and a garage ranging in size from 400 to 651 square feet of building area. The comparables sold from April to December 2021 for prices ranging from \$365,000 to \$415,000 or from \$153.25 to \$169.40 per square foot of living area, including land.

Based on this evidence, the board of review requested confirmation of the subject's estimated market value as reflected by its 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 nine comparable sales, one of which was common to both parties, in order to support their respective positions before the Property Tax Appeal Board. The

Board has given reduced weight to appellant's comparables #1, #2, and #3 as the record evidence failed to indicate whether any of these three homes have finished basement area, like the subject. The Board gave reduced weight to board of review comparables #2, #4 and #5, which also have unfinished basements, unlike the subject.

The Board finds the best evidence of market value to be appellant's comparable sale #5, appellant's sale #4/board of review comparable sale #3 (the parties' common comparable), which has finished basement area as reported by the board of review, along with board of review comparable #1. These three most similar comparables sold in April and May 2021 for prices ranging from \$345,000 to \$367,500 or from \$153.25 to \$158.55 per square foot of living area, including land. The subject's assessment reflects a market value of \$375,344 or \$158.37 per square foot of living area, including land, which is above the range established by the best comparable sales in this record in terms of overall value and within the range on a per-square-foot basis which appears to be justified given the larger finished basement area of the subject as compared to the best comparables in the record with known finished basement area sizes (board of review comparable #1 and the parties' common comparable).

Based on this evidence and after considering appropriate adjustments to the best comparables for differences when compared to 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.



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: March 26, 2024



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Pietro Gennuso, by attorney:
Ronald Kingsley
Lake County Real Estate Tax Appeal, LLC
40 Landover Parkway
Suite 3
Hawthorn Woods, IL 60047

COUNTY

Lake County Board of Review
Lake County Courthouse
18 North County Street, 7th Floor
Waukegan, IL 60085