



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

APPELLANT: Randy Swenson  
DOCKET NO.: 24-02053.001-R-1  
PARCEL NO.: 05-23-401-006

The parties of record before the Property Tax Appeal Board are Randy Swenson, the appellant, by Ronald Kingsley, attorney-at-law 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 **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:** \$60,319  
**IMPR.:** 139,681\$  
**TOTAL:** \$200,000

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 2024 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 is improved with a two-story dwelling of brick and frame construction that contains approximately 3,045 square feet of living area. The dwelling was constructed in 2014. Features of the home include a basement that is partially finished, central air conditioning, one fireplace, 2½ bathrooms, an attached two-car garage with 664 square feet of building area and a detached 2-car garage with 520 square feet of building area. The property has a 3.882 acre or 169,100 square foot site and is located on the shore of Wooster Lake in Ingleside, Grant Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$525,000 as of January 1, 2023. The appraisal was prepared by Joseph Herchenbach, an Illinois Certified Residential Real Estate Appraiser. The intended use of the appraisal was to estimate the market

value of the subject property for the purpose of assisting the appellant with a real estate tax appeal. The fee simple property rights were appraised. The appraiser determined the highest and best use of the property was its present use. The appraiser indicated in the report that an interior and exterior inspection of the property was performed.

The appraiser described the subject property as having a 3.882-acre site with 1.26 acres above water. The appraiser explained that the western 2/3 of the site is located below the water level leaving an effective site of 1.26 acres.

The appraiser developed the sales comparison approach to value using three comparable sales improved with two-story dwellings of frame, vinyl or brick and frame exterior construction that range in size from 2,090 to 4,109 square feet of living area. The dwellings range in age or have effective ages from 25 to 64 years old. Each property has a basement with two having finished area, two comparables have one or two fireplaces, and each property has 2½, 3 or 4 bathrooms. Comparable #1 has a 3-car and a 2-car garage, comparable #2 has a 2-car garage, and comparable #3 has a 3-car garage. Each property is located along a lake and has an effective site ranging in size from .22 to 1.41 acres. The properties are located from .05 to .90 of a mile from the subject property. The sales occurred from December 2020 to October 2022 for prices ranging from \$395,000 to \$475,000 or from \$96.13 to \$215.31 per square foot of living area, including land.

The appraiser explained in the report that sale #1 is a recent sale of a considerably larger home on the subject street, very similar in overall site appeal/utility, its older age has been effectively reduced by the assessor due to additions/renovations, requires adjustment for its inferior condition/upgrades, and is given strong consideration. The appraiser stated that sale #2 is the only other comparable sale on the subject lake, its older age has also been effectively reduced by the assessor due to additions/renovations, is more comparable in condition/upgrades to the subject as opposed to the condition and upgrades apparent in Sale #1 and closely supports the indicated value. The appraiser stated that sale #3 is another sale of a similar size/age home from a nearby competing lake, is adjusted for its smaller site size but with superior access to the surrounding Chain-O-Lakes and supports the indicated value.

In the grid analysis the appraiser adjusted the comparables for such characteristics as age, condition, room count, gross living area, basement or basement finish, garage size, number of fireplaces, and upgrades. The adjusted prices for the comparables ranged from \$515,000 to \$526,000 with the appraiser arriving at an indicated market value for the subject property under the sales comparison approach of \$525,000 as of January 1, 2023. Based on this evidence the appellant requested the subject's total assessment be reduced to \$174,982 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$218,441. The subject's assessment reflects a market value of \$655,388 or \$215.23 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>1</sup>

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<sup>1</sup> Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be

In support of its contention of the correct assessment the board of review submitted information on three comparable sales identified by the township assessor, however, the data was not set forth on a form prescribed by the Property Tax Appeal Board as required by section 16-165 of the Property Tax Code and sections 1910.40(a) and 1910.80 of the rules of the Property Tax Appeal Board. (See 35 ILCS 200/16-165 & 86 Ill.Admin.Code §1910.40(a) and §1910.80.) Standing Order 2 issued by the Property Tax Appeal Board provides in part that if a Board of Review's Notes on Appeal does not conform to the grid on the prescribed Property Tax Appeal Board form, the board of review's comparable sales will be given no weight. This directive is mandatory for staff of the Property Tax Appeal Board. In accordance with Standing Order 2 the three comparables sales are given no weight in determining the correct assessment of the subject property and will not be further discussed.

The board of review submission also included a copy of a decision issued by Property Tax Appeal Board regarding the subject property for the 2023 tax year in Docket Number 23-00645.001-R-1 in which this Board determined the subject property had a total assessment of \$205,785. The board of review documentation also included the three comparable sales used by the appellant in the 2023 appeal and the eight comparable sales provided by the board of review in the 2023 appeal, which will be summarized.

The appellant's comparables previously submitted in the 2023 appeal consist of three sales improved with two-story dwellings of frame exterior construction that range in size from 2,462 to 4,109 square feet of living area. The homes range in age from 21 to 101 years old. Each property has a basement with one having finished area, central air conditioning, one fireplace, and 2½ to 4 bathrooms. Comparables #1 and #2 have garages with 1,640 and 260 square feet of building area, respectively. These properties have sites ranging in size from 6,268 to 188,048 square feet of land area. The comparables are located from approximately .05 to 1.30 miles from the subject with comparable #1 having the same neighborhood code as the subject property. The sales occurred from June 2021 to October 2022 for prices ranging from \$278,000 to \$395,000 or from \$96.13 to \$136.03 per square foot of living area, including land.

The board of review resubmitted information on two sets of four comparable sales from the 2023 appeal with the first set of four being identified as "All sales in the subject neighborhood." These comparables have the same neighborhood code as the subject property and are located from approximately .39 to .54 of a mile from the subject property. The comparables are improved with one-story or two-story dwellings of frame or brick exterior construction that range in size from 1,520 to 2,490 square feet of living area. The homes were built from 1925 to 1993. Each property has a basement with finished area, central air conditioning, 2½ or 3 bathrooms, and a garage ranging in size from 500 to 1,550 square feet of building area. Three comparables have one fireplace. These properties have sites ranging in size from 33,903 to 468,806 square feet of land area. The sales occurred from April 2020 to December 2022 for prices ranging from \$310,000 to \$565,000 or from \$124.50 to \$296.05 per square foot of living area, including land.

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considered. 86 Ill.Admin.Code §1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2024.

The second set of four comparable sales submitted by the board of review are identified as “closest non-chain lake to Wooster Lake” that have been renumbered as comparables #5 through #8 by this Board for clarity purposes. The board of review provided a comparable map depicting the location of the subject property along the shore of Wooster Lake while these board of review comparables are depicted as being located along or near Long Lake approximately .93 to 1.61 miles from the subject property. These four comparables are improved with two-story dwellings of frame or brick and frame exterior construction that range in size from 1,523 to 2,262 square feet of living area. The homes were built from 1980 to 2019. Each property has central air conditioning, 2½ or 3 bathrooms, and a garage ranging in size from 420 to 784 square feet of building area. Comparables #7 and #8 have basements with one having finished area, and each has one fireplace. The comparables have sites ranging in size from 6,512 to 14,514 square feet of land area. The sales occurred from June 2021 to October 2023 for prices ranging from \$405,000 to \$475,000 or from \$198.94 to \$311.88 per square foot of living area, including land.

The board of review submission also included a letter from Angela Wold, Chief Deputy Assessor of Grant Township, in which she asserted that appellant’s appraisal comparable #1 sold “as is” and was in the middle of renovation at the time of sale. She also stated comparable #2 has a 2020 sale and is not relevant for 2024. A grid analysis of the comparables used in the appraisal also reported different dwelling sizes for comparables #2 and #3.

### **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 evidence in the record supports a reduction in the subject's assessment.

The Board finds the appellant submitted an appraisal prepared by an Illinois Certified Residential Real Estate Appraiser estimating the subject property had a market value of \$525,000 or \$172.41 per square of living area, including land, as of January 1, 2023. The appellant’s appraiser utilized the sales comparison approach to value using three comparable sales with varying degrees of similarity to the subject property. The appraiser adjusted the comparables for differences from the subject, which were explained in the report and appear logical. The subject's assessment reflects a market value of \$655,388 or \$215.23 per square foot of living area, including land, which is above the appraised value. Despite the fact the effective date of the report precedes the assessment date at issue by one year, the Board finds weight should be placed on the appellant’s appraisal in establishing the correct assessment of the subject property.

The board of review submission included information on eleven sales that were previously submitted by the parties in the 2023 appeal before the Property Tax Appeal Board. The Board finds that these eleven comparables are inferior to the subject property for various reasons such as land area, age, dwelling size, and/or features, which detract from the weight the Board can give this raw sales data. In summary these comparables sold for prices ranging from \$278,000 to \$565,000 or from \$96.13 to \$311.88 per square foot of living area, including land. Due to significant differences, these properties would require numerous adjustments to make them more

equivalent to the subject property. The subject's assessment reflects a market value of \$655,388 or \$215.23 per square foot of living area, including land, which is above the overall price range of the comparables but is within the range on a per square foot of living area basis. Given the differences between the comparables and the subject property, the Board finds these sales also support a reduction in the subject's assessment.

Based on this evidence, after considering the appraisal submitted by the appellant and the comparable sales submitted by the board of review, the Property Tax Appeal Board finds a reduction in the subject's assessment is 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

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: February 17, 2026



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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