



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

APPELLANT: Anthony & Jill Fratini  
DOCKET NO.: 19-08534.001-R-1  
PARCEL NO.: 13-11-300-316

The parties of record before the Property Tax Appeal Board are Anthony and Jill Fratini, the appellants, 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 **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:** \$7,947  
**IMPR.:** \$114,707  
**TOTAL:** \$122,654

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 is improved with a 1.5-story residential condominium of frame construction with 2,214 square feet of living area. The dwelling was constructed in 1980 and is approximately 39 years old. Features of the property include a full walk-out basement with 1,000 square feet of finished area, central air conditioning, two fireplaces and a detached garage with 441 square feet of building area. The property has a 2,214 square foot site and is located in Lake Barrington, Cuba Township, Lake County.

The appellants contend overvaluation based on comparable sales as the basis of the appeal. In support of this argument the appellants submitted information on four comparable sales improved with 1.5-story dwellings of frame construction that range in size from 1,789 to 2,214 square feet of living area. The dwellings range in age from 34 to 40 years old and have sites ranging in size from 1,789 to 2,214 square feet of land area. Each property has a full basement

containing from 452 to 1,000 square feet of finished area, central air conditioning, two fireplaces and a garage ranging in size from 441 to 484 square feet of building area. The comparables have the same assessment neighborhood code as the subject and are located within approximately .45 of one mile from the subject property. The sales occurred from February 2018 to October 2019 for prices ranging from \$195,000 to \$348,000 or from \$101.63 to \$174.52 per square foot of living area, land included.

The appellants' submission also included a brief in which counsel calculated the sale price per square foot of building by deducting the value of the land reflected by the assessment from the total sale price to arrive at a building residual value per square foot, which ranged from \$90.86 to \$150.07.

The appellants requested the subject's total assessment be reduced to \$91,945.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$122,654. The subject's assessment reflects a market value of \$372,922 or \$168.44 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 two comparable sales improved with 1.5-story dwellings of frame construction built in 1978 and 1979 each with 2,214 square feet of living area. Each property has basement with 1,000 square feet of finished area, central air conditioning, one or two fireplaces, and a detached garage with 441 square feet of building area. Each property has 2,214 square feet of land and is located within .20 miles of the subject property. The sales occurred in April 2017 and October 2019 for prices of \$324,000 and \$400,000 or for \$146.34 and \$180.67 per square foot of living area, including land, respectively.

The board of review grid analysis as well as the copy of the subject's property record card submitted by the board of review disclosed the subject property was purchased in June 2017 for a price of \$370,000 or \$167.12 per square foot of living area, including land.

### **Conclusion of Law**

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellants requested the subject's total assessment be reduced to \$91,945, which reflects a market value of approximately \$275,860, rounded, when applying the statutory level of assessments. The Board finds the requested assessment is not credible given the fact the subject property was purchased approximately 18 months prior to the assessment date for a price of \$370,000, approximately 34% greater than the market value requested by the appellants. The

Board finds the veracity of the appellants' argument is undermined by the subject's purchase price, which was not disclosed in the appellants' submission.

The Board further finds the record contains six sales submitted by the parties to support their respective positions. Appellants' comparable #1 and the board of review comparables are the most similar to the subject property in location, size and features. These three comparables are practically identical to the subject in all aspects. The Board finds, however, appellants' comparable sale #1 is an outlier with a purchase price of \$225,000 in relation to the sale of the subject property for a price of \$370,000 and the board of review comparables with prices of \$324,000 and \$400,000, respectively. As a result, little weight is given appellants' comparable sale #1. The Board finds, however, the two sales provided by the board of review are supportive of the subject's assessment. Less weight is given the three remaining comparables provided by the appellants as they were not as similar to the subject property as the best sales found herein.

In conclusion, considering the sale of the subject property and the comparables provided by the board of review, the Board finds the assessment of the subject property as established by the board of review is correct and 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



\_\_\_\_\_  
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: July 19, 2022



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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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