



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

APPELLANT: Giovanni Frezza  
DOCKET NO.: 20-02736.001-R-1  
PARCEL NO.: 15-20-406-016

The parties of record before the Property Tax Appeal Board are Giovanni Frezza, the appellant, by attorney Robert Rosenfeld of Robert H. Rosenfeld and Associates, LLC 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:** \$38,569  
**IMPR.:** \$129,954  
**TOTAL:** \$168,523

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 is improved with a two-story dwelling of wood siding exterior construction with 2,587 square feet of living area. The dwelling was constructed in 1989 and is approximately 31 years old. Features of the home include a partial basement that is partially finished, central air conditioning, and an attached garage with 460 square feet of building area. The property has a 17,232 square foot site and is located in Buffalo Grove, Vernon Township, Lake County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables improved with two-story dwellings of wood siding exterior construction that range in size from 2,322 to 2,790 square feet of living area. The homes range in age from 29 to 32 years old. Each comparable has a partial or full basement with three having finished area, central air conditioning and an attached garage that range in size from 460 to 670 square feet of building

area. Three comparables each have one fireplace. These properties are located from .05 to 1.01 miles from the subject property and have the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$101,151 to \$123,164 or from \$42.80 to \$44.40 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$112,922.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$168,523. The subject property has an improvement assessment of \$129,954 or \$50.23 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables improved with two-story dwellings of wood siding exterior construction that range in size from 2,230 to 2,758 square feet of building area. The comparables were built from 1989 to 1991. Each property has a full or partial basement with one having finished area, central air conditioning and an attached garage with either 460 or 462 square feet of building area. Three comparables each have one fireplace and comparable #4 has an inground swimming pool. The comparables are located from .09 to .91 of one mile from the subject property and have the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$119,910 to \$137,505 or from \$49.86 to \$53.77 per square foot of living area.

### **Conclusion of Law**

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 information on eight comparables submitted by the parties to support their respective positions. The Board gives less weight to board of review comparable #4 due to differences from the subject dwelling in size and the fact this property has an inground swimming pool, unlike the subject property. The seven remaining comparables are similar to the subject in location, dwelling age, size and most features. These comparables have improvement assessments that range from \$101,151 to \$137,505 or from \$42.80 to \$51.29 per square foot of living area. The subject's improvement assessment of \$129,954 or \$50.23 per square foot of living area falls within the range established by the best comparables in this record.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill.2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which appears to exist on the basis of the evidence.

Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed 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.



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: December 20, 2022



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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