



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

APPELLANT: Semion Krishtal  
DOCKET NO.: 19-23677.001-R-1  
PARCEL NO.: 08-22-203-048-1052

The parties of record before the Property Tax Appeal Board are Semion Krishtal, the appellant(s), by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Chicago; and the Cook 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 **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$1,715  
**IMPR.:** \$11,920  
**TOTAL:** \$13,635

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

Appellant timely filed the appeal from a decision of the Cook 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 consists of a single condominium unit, with a 1.3000% ownership interest in the common elements, located in a 75-unit building on a 125,674 square foot site, in Mount Prospect, Elk Grove Township, Cook County. The subject property is 40 years old and is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant contends overvaluation as the basis of the appeal. In support of this argument, appellant submitted its Comparable Sales Grid Analysis reflecting sales information for 4 condominium units in the same building as the subject property. The comparable properties sold between June 2017 and May 2018 for prices ranging between \$89,000 and \$135,000. In its "Petition and Argument," Appellant contends its condominium analysis shows the gross sales price as well as an adjusted sales price. Appellant's adjusted sale price deducts \$3,500 per unit

for personal property such as finished kitchens, draperies, wall to wall carpet, and other items of personal property. Then, appellant proposed an assessed value for the subject property of \$122,550 based on 13 sales. The 13 comparable sales were condominium units in the same building as the subject property and sold between 2015 and 2018. Appellant deducted \$3,500 from each sales price for personal property and applied a "corrected sales ratio" to each sale price. Based on this evidence, appellant requested the subject property's total assessment be reduced to \$12,255, after applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$13,635. The subject's assessment reflects a market value of \$136,350 when applying the level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance. In support of its contention of the correct assessment, the board of review submitted information on 12 suggested comparable sales in the same building as the subject property. The comparable sales sold between 2016 and 2019 for a total of \$1,702,000. Based on the combined 15.09% ownership in the common elements for the 12 units, the resulting total market value for the building is \$11,278,993. After multiplying the 1.3000% ownership in the common elements for the subject property by the building's total market value, the board of review calculated the subject property's market value at \$146,627 and an assessed value of \$14,663 after applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance.

### **Conclusion of Law**

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

Regarding the personal property, appellant did not provide sufficient evidence to support deducting an additional amount from the sale price to account for personal property. The Board finds the best evidence of market value to be the total of the board of review's sales, most of which were also included in the appellant's evidence. Based on the total value of the building and the subject property's ownership in the common elements of 1.3000%, the result is a total assessed value for the subject property of \$14,663, after applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance. Based on this record, the Board finds that the subject property's current assessment of \$13,635 is below the amount reflected by the best indicator of market value in this record and supports the current assessment. Accordingly, appellant did not prove by a preponderance of the evidence that the subject property was overvalued and a reduction in the subject's assessment to appellant's request 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:

April 18, 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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