



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

APPELLANT: Semion Krishtal
DOCKET NO.: 19-33131.001-R-1
PARCEL NO.: 04-32-408-021-1005

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 Northbrook; and the Cook 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 **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$259
IMPR.: \$10,879
TOTAL: \$11,138

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The 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 unit out of a six-unit condominium complex with 900 square feet of living area. The dwelling was constructed in 1987. The property has a 299 square foot site and is located in Glenview, Northfield Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales. The sales occurred from March 2016 to July 2017 for prices ranging from \$60,000 to \$135,582 or an adjusted sales price of \$56,500 to \$132,082 which factored in a personal property allocation of \$3,500 per unit. Based on this evidence, the appellant requested an assessment of \$8,832.

In support of its contention of the correct assessment the board of review submitted a condominium analysis showing that two units in the subject's building, or 34.16% of ownership in the common elements, sold on September 2016 to November 2018, for prices ranging from \$115,000 to \$158,000. The aggregate sale price of \$273,000 was then divided by the percentage of ownership interest in the common elements of the units sold to arrive at a total market value for the building of \$799,180.

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 *met* this burden of proof and a reduction in the subject's assessment *is* warranted.

The Board finds the best evidence of market value to be the comparable sales submitted by both parties. In its analysis, both parties utilized a sale for the PIN ending in -1003. The Board finds most recent sale for the PIN ending in -1003 is included in the board of review's analysis (\$158,000). In taking the aggregate sales price of the most similar and more recent sales (\$333,000) and dividing by the total percentage of interests sold of 51.51%, the Board finds the subject's building has a full market value of \$646,476. Multiplying this amount by the total percentage of units under appeal of 17.23%, the Board finds a market value for the unit under appeal of \$111,388, which, when multiplied by the 10% assessment ratio, results in an assessment for the units under appeal of \$11,138. The subject's current assessment reflects an assessment value below the assessment value established by the best comparables in this record. The Board further finds that there was no evidence submitted to show that personal property was included in any of the sale transactions, and that no deduction is warranted for this factor. Based on this record, the Board finds the appellant *has* proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment *is* warranted.

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:

May 21, 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

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