



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

APPELLANT: Tatyana Rivtis
DOCKET NO.: 20-22516.001-R-1
PARCEL NO.: 03-07-201-019-1100

The parties of record before the Property Tax Appeal Board are Tatyana Rivtis, the appellant; 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: \$325
IMPR.: \$8,726
TOTAL: \$9,051

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 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 consists of a single condominium unit with 598 square feet of living area located within a condominium building containing 336 units that is approximately 41 years old. The unit has a 0.3031% ownership interest in the common elements of the condominium property.¹ The property has an 857,848 square foot site and is located in Buffalo Grove, Wheeling 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 four comparable sales located within the same condominium as the subject property. Based on the evidence provided by the board of review, appellant's comparables #1 through #3 each have 0.1973% ownership interest and the appellant's

¹ The subject's ownership interest is found in the evidence provided by the board of review.

comparable #4 has 0.3031% ownership interest in the common elements of the subject's condominium complex. Each condominium unit has either 560 or 600 square feet of living area. The comparables sold from March 2019 to October 2019 for prices ranging from \$50,000 to \$84,500 or from \$89.29 to \$150.89 per square foot of living area, land included.

Based on this evidence, the appellant requested a reduction in the subject's total assessment to \$7,375, which would reflect a market value of \$73,750 or \$123.33 per square foot of living area, land included, when applying the level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$9,051. The subject's assessment reflects a market value of \$90,510 or \$151.35 per square foot of living area, land included, when applying the level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted a sales analysis prepared by Erin Hernandez, an analyst with the Cook County Board of Review. The analyst provided sales data on 38 comparables of residential condominium, three of which are duplicates of the appellant's comparable sales #1 through #3. The sales occurred from February 2018 to December 2019 for prices ranging from \$78,500 to \$143,000. The analyst reported a total consideration for these sales of \$4,016,700 and the percentage of interest of ownership of common elements in the condominium property for the units that sold of 11.9984%. Dividing the total consideration by the total percentage of interest of ownership in the common elements of the condominiums indicated a full market value for the condominium property of \$33,476,964. The analyst then applied the percentage of interest the subject unit had in the condominium of 0.3031% to arrive at a full market value for the subject condominium unit of \$101,469. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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

The appellant provided four comparable sales, while the board of review provided a sales analysis of 38 comparable sales, which included three common comparables, to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to three of board of review's condominium sales that occurred prior to 2019 and are less likely to reflect the market value of the subject property as of the January 1, 2020 assessment date at issue. Therefore, the Board will analyze the 39 comparable sales presented by parties, which includes the parties' three common comparables that sold in 2019.

The Board finds the best evidence of market value in the record to be the nine comparable sales presented by the board of review which have the same 0.3031% ownership interest in the condominium property as the subject and also sold closer in time to the January 1, 2020 assessment date at issue. These nine comparables sold from January to December of 2019 for prices ranging from \$87,000 to \$110,000. The subject's assessment reflects a market value of \$90,510 which falls within the sale price range established by the nine best comparables sales in the record. The Board gives less weight to the appellant's comparable sale #4 because it appears to be an outlier with its substantially lower sale price in contrast to the sale prices of the other comparables in the record. Less weight is also given by the Board to the 29 remaining comparable sales, including the parties' three common comparables, due to differences from the subject's ownership percentage in the condominium property and/or the comparables' older sale dates that occurred less proximate in time to the January 1, 2020 assessment date at issue.

Based on this evidence the Board finds 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Tatyana Rivtis
2 Villa Verde #306
Buffalo Grove, IL 60089

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602