



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

APPELLANT: Yevgenya Kaydanova
DOCKET NO.: 20-40184.001-R-1
PARCEL NO.: 04-04-304-212-0000

The parties of record before the Property Tax Appeal Board are Yevgenya Kaydanova, the appellant, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; 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: \$9,370
IMPR.: \$35,130
TOTAL: \$44,500

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 property consists of a 2-story dwelling of frame and masonry exterior construction with 2,555 square feet of living area. The dwelling was built in 1996 and is approximately 24 years old. Features of the home include a basement, central air conditioning, one fireplace, and a 2-car garage. The property has a 4,685 square foot site located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-95 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 eight comparable sales, one of which has the same assessment neighborhood code as the subject and is located on the same block and street as the subject. The comparables have sites that range in size from 3,018 to 3,509 that are improved with 2-story dwellings with either 2,557 or 2,565 square feet of living area. The homes were

built from 1991 to 2001 and thus would range in age from 19 to 29 years old. Each comparable has a basement, central air conditioning, one fireplace, and a 2-car garage. The properties sold from May 2019 to November 2020 for prices ranging from \$363,000 to \$445,000 or from \$141.52 to \$174.03 per square foot of living area, land included. Based on the foregoing evidence, the appellant requested the subject's assessment be reduced to \$40,840 reflecting a market value of \$408,400 or \$159.84 per square foot of living area, land included, when applying the level of assessment for a class 2 property of 10% 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 \$47,298. The subject's assessment reflects a market value of \$472,980 or \$185.12 per square foot of living area, land included, when applying the level of assessment for class 2 property of 10% 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 four comparable properties, two of which are located in the same assessment neighborhood code and on the same block as the subject. The comparables have sites that range in size from 1,197 to 3,782 square feet of land area that are improved with 2-story or 3-story, class 2-95 single family dwellings ranging from 2,217 to 2,917 square feet of living area. The homes are from 1 to 30 years old. Three comparables each have a basement and one comparable has a concrete slab foundation. Each comparable has central air conditioning, either one or two fireplaces, and a 2-car garage. The properties sold from May 2019 to November 2020 for prices ranging from \$475,000 to \$614,000 or from \$162.84 to \$245.21 per square foot of living area, land included. The board of review disclosed in the grid that the subject sold in December 2017 for \$450,000. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In written rebuttal, the appellant's counsel opined that the board of review comparables were not acceptable comparable sales. The counsel opined that comparable #1 appeared to be misclassified based on the photographic evidence and noted that comparable #1 had a larger dwelling size, while comparables #3 and #4 were located over 2.5 miles from the subject. Additionally, counsel noted that comparable #4 differed in age, style, size and foundation from the subject. The appellant also provided two grid analyses, one of both parties' comparables and the second with the appellant's opinion of the best comparables. Based on the evidence presented, the appellant's counsel argued that the subject was overassessed and a reduction as requested by the appellant was warranted.

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 proven 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). Based on the evidence in this record, the Board finds that a reduction in the subject's assessment is warranted.

As an initial matter, the Board gives no weight to the board of review's disclosure that the subject sold in December 2017, two years prior to the subject's lien date.

The Board finds the best evidence of market value to be the appellant's comparable #1 and board of review comparable #2 which sold proximate to the subject's January 1, 2020 assessment date at issue and are located in the same assessment neighborhood code and on the same block as the subject. The two comparables are similar to the subject in age, dwelling size, and other features. and sold for prices of \$445,000 and \$475,000 or \$162.84 and \$174.03 per square foot of living area, land included. The subject's assessment reflects a market value of \$472,980 or \$185.12 per square foot of living area, land included, which is bracketed by the two best comparable sales in this record on an overall market value basis but above on a price per square foot basis and appears excessive. The Board gives less weight to the appellant's comparables #2 through #8, as well as board of review comparables #3 and #4 which are each located in a different neighborhood code than the subject and less likely to reflect the market conditions in the subject's neighborhood. The Board gives less weight to board of review comparable #1 which appears to be a detached single family home rather than an attached townhouse, like the subject. Additionally, board of review comparable #4 differs from the subject in story height, age, and foundation type. Therefore, based on this record and after considering adjustments to the two best comparables for differences from the subject, including but not limited to dwelling size, the Board finds a reduction in the subject's estimated market value based on its assessment is 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: _____

October 15, 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

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

APPELLANT

Yevgenya Kaydanova, by attorney:
Jessica Hill-Magiera
Attorney at Law
790 Harvest Drive
Lake Zurich, IL 60047

COUNTY

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