



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Alexander Alifimoff

DOCKET NO.: 21-42205.001-R-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Alexander Alifimoff, the appellant, by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-42205.001-R-1	14-29-418-059-1001	13,092	55,658	\$68,750
21-42205.002-R-1	14-29-418-059-1002	12,912	62,933	\$75,845
21-42205.003-R-1	14-29-418-059-1003	12,616	61,496	\$74,112
21-42205.004-R-1	14-29-418-059-1004	11,406	55,594	\$67,000

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 2021 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 is improved with a condominium building containing four units. The building is 24 years old, and it is located on a 3,335 square foot site in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

As a preliminary matter, the original appeal petition challenged the assessments of all four units in the building for the 2021 tax year. At the time the original petition was filed, the appellant requested an extension of time to file supporting evidence, and this request was granted. With supporting evidence, appellant filed an amended appeal petition challenging only the assessment of the condominium unit with a property index number ending in 1001. Accordingly, this appeal

concerns only the assessment of that condominium unit and the corresponding ownership interest in the common elements.

The appellant asserts overvaluation as the ground for the appeal. The appellant presented evidence that the subject property was sold on April 23, 2021, for a price of \$687,500. The appellant filled out Section IV - Recent Sale Data of the PTAB residential appeal form and disclosed that the property was sold by a realtor, and it was advertised for sale for about two months via Multiple Listing Service (MLS). The appellant also disclosed that the sale was not due to a foreclosure action, and the property was not sold using a contract for deed. The appellant failed to answer the inquiry in section IV about whether the sale was a transfer between family or related corporations. The appellant's evidence included the closing statement, real estate contract, and warranty deed from the transaction.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject building's four units as \$293,860. The total assessment of the appellant's unit was \$76,903. In support of its contention of the correct assessment, the board of review submitted its Condominium Analysis Results for 2021. This included information about three sales of condominium units in the subject building, including the April 2021 sale of the appellant's unit. Based on that data, the full value of the units in the building was \$2,938,619, indicative of a total assessed value was \$293,862. Because appellant's condominium unit represented a 26.17% ownership interest, its value was \$769,036.59 under that analysis, which would support the assessment.

This matter was set for hearing before an Administrative Law Judge on October 27, 2025, but the parties agreed to waive the hearing and stand on the documentary evidence they had submitted.

Conclusion of Law

The appellant asserts overvaluation as a ground for appeal. When market value is the basis of the appeal, the taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 that the appellant met this burden of proof.

The Board's task in this case is to determine the correct assessment of the subject property. *See* 35 ILCS 200/16-180. Under Illinois law, real property must be valued at its fair cash value, meaning the price that would be paid for it at a fair, voluntary sale where the buyer and seller are both ready, willing, and able to buy and sell, but neither is compelled to do so. Bd of Educ of Meridian Community School Dist. No. 223 v. Ill. Property Tax Appeal Bd., 2011 IL App (2d) 100068, ¶ 36. A contemporaneous sale of the subject property between parties dealing at arms-length is practically conclusive on the issue of whether an assessment reflected the fair cash market value of the property. Gateway-Walden LLC v. Pappas, 2018 IL App (1st) 162714, ¶ 33.

The Board finds that the best evidence of the subject's value is the evidence relating to the April 2021 sale of the appellant's condominium unit and ownership interest in the common elements.

That sale took place very close to the applicable lien date of January 1, 2021. In contrast, the two other sales relied on by the board of review each took place over a year and a half prior to the lien date.

Although the appellant failed to respond to the inquiry in Section IV of the appeal petition about whether the sale involved related parties, the appellant stated that the sale did not result from a foreclosure, the property was sold by a realtor, and it was advertised for sale via MLS for about two months. Furthermore, the board of review relied upon the sale in its Condominium Analysis. This Board therefore concludes from the evidence that the April 2021 sale of the appellant's condominium unit was an arm's length transaction.

The sale price for appellant's condominium unit and ownership of the common elements was \$687,500, resulting in a corresponding assessed value of \$68,750 under the 10% level provided in the Cook County Real Property Assessment Classification Ordinance. Because the subject's assessed value is greater than this amount, appellant is entitled to a reduction.

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: _____

C E R T I F I C A T I O N

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:

January 20, 2026



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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APPELLANT

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