



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

APPELLANT: Allan Arutyunov  
DOCKET NO.: 22-23675.001-R-1  
PARCEL NO.: 05-07-410-034-1003

The parties of record before the Property Tax Appeal Board are Allan Arutyunov, the appellant, by attorney Anthony DeFrenza, of the Law Office of DeFrenza & Mosconi PC, 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 **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:** \$5,561  
**IMPR.:** \$38,688  
**TOTAL:** \$44,249

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 2022 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 an individual residential condominium unit in a three-unit condominium. The condominium is approximately 22 years old and has a 9,750 square foot site which is located in Glencoe, New Trier Township, Cook County. The subject residential unit is classified as class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant filed the appeal based on overvaluation. In support of the appeal, the appellant completed Section IV – Recent Sale Data reporting that the subject was purchased on July 16, 2020 for a price of \$410,000. The appellant reported the property was purchased from the seller, through the use of a Realtor after the property had been on the market with the Multiple Listing Service (MLS) for a period of 7 months. The appellant reported the parties to the transaction were not related, the property was not sold due to a foreclosure action and the property was not

sold using a contract for deed. In further support of the appeal, the appellant reported the subject has a 25.35% ownership interest in the common elements of the condominium. In further support of the purchase price, the appellant supplied Exhibit B consisting of a Listing History for the subject depicting an original asking price of \$439,000 before the property sold as previously outlined herein along with a copy of the MLS listing sheet. A copy of the Settlement Statement related to the sale was also provided depicting the distribution of two commissions related to the sale.

In support of the appeal, the appellant submitted a brief outlining the subject's sale price, less a 5% adjustment factor for personal property, in order to arrive at an opinion of value of the three-unit condominium of \$1,536,487. Then applying the subject's ownership interest to the full value of the condominium, the appellant requested a reduced total assessment of \$38,950 for the subject.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$44,249. The subject's assessment reflects a market value of \$442,490, including land, when applying the level of assessment for class 2 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 document entitled Condominium Analysis Results for 2022 prepared by Marco Fernandez in which the same sale presented by the appellant was used along with presentation of a second sale of unit - 1002 in January 2022 for a price of \$475,000. The board of review also presented the respective ownership interests in each of the three-units. Applying the two sales with a total consideration of \$885,000 with a combined ownership interest in the common elements of the building of 50.70%, the board of review arrived at a total consideration for the condominium of \$1,745,562. Applying the 10% Ordinance level of assessment for class 2-99 property results in a total assessment for the condominium of \$174,556 and an assessment for the subject based on a 25.35% ownership interest of \$44,250, rounded, which supports the current assessment. Based on the foregoing submission, 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 submitted data on the 2020 purchase price of the subject property and the board of review submitted a sale of a second unit in the condominium which occurred in January 2022.

The Property Tax Appeal Board finds that the two sales in the record from within the subject's condominium building include the subject unit which sold in July 2020, approximately 17 months prior to the lien date at issue, for \$410,000 and a January 2022 sale of another unit for

\$475,000 which sold immediately proximate to the lien date at issue. These sales reflect an aggregate sales price of \$885,000 where the sales depict an aggregate ownership interest of the properties that sold of 50.70% resulting in a full market value for the subject condominium of \$1,745,562.

Applying the ownership interest of the unit on appeal of 25.35% to this full value of the building, results in a market value of \$442,450 for the parcel on appeal. The Board also finds that the appellant provided no evidence demonstrating that any amount of the purchase price of the subject unit included consideration for personal property or identified specifically those items considered personal property. Therefore, on this record, the Board has given no weight to the appellant's 5% downward adjustment to the sales prices for purported "personal property."

Given this record, the Board finds that the current total assessment of the residential unit on appeal is \$442,450. On this record, the Property Tax Appeal Board finds the market value evidence in the record establishes the subject is not overvalued based on its assessment and no change 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: \_\_\_\_\_

August 19, 2025



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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