



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

APPELLANT: Denis Stolyarov
DOCKET NO.: 22-53880.001-R-1
PARCEL NO.: 04-08-417-004-0000

The parties of record before the Property Tax Appeal Board are Denis Stolyarov, 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: \$17,968
IMPR.: \$40,031
TOTAL: \$57,999

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 property consists of a multi-level dwelling of frame and masonry exterior construction with 1,976 square feet of living area and which is approximately 56 years old. Features include a partial basement/lower level, central air conditioning, a fireplace, and a two-car garage. The property has an 11,979 square foot site and is located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables,¹ located in the same neighborhood code as the subject and from .01 to .17 of a mile

¹ The brief supplied by the appellant made reference to the submission of six equity comparables. This appeal was filed on September 14, 2023, by counsel using the Board's Electronic Filing Portal (EFP) (86 Ill.Admin.Code Sec.

from the subject. The comparables consist of class 2-34 dwellings of frame and masonry exterior construction which are 54 to 57 years old. The dwellings range in size from 1,800 to 2,186 square feet of living area. Features include partial basements/lower levels, central air conditioning, and a 400 or an 800 square foot garage. Two homes each have a fireplace. The comparables have improvement assessments ranging from \$33,633 to \$42,270 or from \$18.58 to \$19.34 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$35,561 or \$18.00 per square foot of living area, which the appellant describes as the “ratio” for the comparables presented.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the final decision disclosing the total assessment for the subject of \$57,999. The subject property has an improvement assessment of \$40,031 or \$20.26 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located in the same neighborhood code as the subject and the same block or ¼ mile from the subject. The comparables consist of class 2-34 multi-level dwellings of frame and masonry exterior construction which are 56 to 58 years old. The dwellings range in size from 1,766 to 1,925 square feet of living area. The comparables have partial basements/lower levels, central air conditioning, a fireplace, and a two-car garage. The comparables have improvement assessments ranging from \$37,589 to \$46,803 or from \$21.28 to \$24.31 per square foot of living area.

Based on this evidence, the board of review requested confirmation of the subject’s assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of eight suggested equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant’s comparable #4 as well as board of review comparables #3 and #4, due to substantially differing dwelling sizes when compared to the subject.

1910.33, effective January 27, 2023). Pursuant to Standing Order #2 issued by the Board on February 14, 2023, the appellant’s comparables #5 and #6 set forth in a chart, other than the electronic form Sec. V grid analysis, have been “give[n] . . . zero weight” in this decision and will not be discussed further herein. (See also, 86 Ill.Admin.Code §1910.80)

The Board finds the best evidence of assessment equity consists of appellant's comparables #1, #2 and #3 along with board of review comparables #1 and #2, which present varying degrees of similarity to the subject. Each of these five best comparables are highly similar to the subject in location, age, classification, exterior construction, and foundation type. Three of the five best comparables necessitate adjustments for differences in dwelling size and two comparables necessitate adjustments for fireplace feature in order to make the comparables more similar to the subject. These comparables have improvement assessments ranging from \$33,633 to \$46,803 or from \$18.58 to \$24.31 per square foot of living area. The subject's improvement assessment of \$40,031 or \$20.26 per square foot of living area is within the range of the best comparables both in terms of overall improvement assessment and on a per-square-foot of living area basis.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject to make the comparables more similar to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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: _____

September 16, 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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