



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

APPELLANT: Aleks & Valentyna Yakovenko
DOCKET NO.: 22-54318.001-R-1 through 22-54318.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Aleks & Valentyna Yakovenko, the appellants, by attorney Holly Zeilinga, of Worssek & Vihon LLP in Chicago; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
22-54318.001-R-1	18-20-201-032-1017	660	7,198	\$7,858
22-54318.002-R-1	18-20-201-032-1041	625	7,674	\$8,299

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 two residential condominium units located within a building that is approximately 44 years old. The property has combined 3.6027% interest in the common elements of the condominium. The property has a 16,597 square foot site and is located in Countryside, Lyons Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants' appeal is based on overvaluation. In support of this argument, the appellants completed Section IV of the appeal petition disclosing the subject sold on March 30, 2018 for a price of \$70,000, the parties to the sale were not related, the property sold using a realtor and was advertised for 4 days on the Multiple Listing Service, and the sale was not due to foreclosure or by contract for deed. In support of the sale of subject parcel ending in -1041, the appellants submitted a copy of a settlement statement disclosing a sale price of \$70,000, a seller identified

as "Suburban Tax Lien", a seller identified as "Wheeler Financial, Inc.", a buyer identified as one of the appellants, and payment of realtors' commissions; and a listing sheet for the April 2018 sale showing a price of \$70,000. In support of the sale of the subject parcel ending in -1017, the appellants submitted a copy of a settlement statement dated December 22, 2017 disclosing a sale price of \$65,000, a buyer identified as one of the appellants; and a listing sheet for the December 2017 sale showing a price of \$65,000. Based on this evidence, the appellants requested a reduction in the subject's combined assessment to reflect the purchase price of subject parcel ending in -1041.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total combined assessment for the subject of \$16,157. The subject's assessment reflects a market value of \$161,570, land included, when using 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 a sales analysis based on twelve sales within the subject's condominium, including the sales of the subject parcels. The properties sold from January 2018 to October 2021 for prices ranging from \$65,000 to \$130,000, with an aggregate sale price of \$1,256,600. The properties have a combined 24.8451% interest in the common elements of the condominium. The board of review computed a value for the condominium of \$5,057,737, which would result in a value for the subject parcels of \$182,215 based on their combined 3.6027% interest. The board of review requested confirmation of the subject's assessment.

Conclusion of Law

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

The appellants presented evidence of sales of the subject parcels in 2017 and 2018 and the board of review presented a sales analysis based on twelve sales within the subject's condominium including the sales of the subject parcels. The Board gave less weight to the December 2017 and April 2018 sales of the subject parcels, which occurred more remote in time from the assessment and is less likely to be indicative of market value as of that date. Similarly, the Board also gives less weight to the board of review's 2018, 2019, and 2020 sales as these sales are less proximate in time to the assessment date and less likely to be indicative of market value as of that date.

The Board finds the best evidence of market value to be the three 2021 sales. These sales have an aggregate sale price of \$328,100 and a combined interest of 5.8077%, resulting in a total value for the condominium of \$5,649,396. The subject parcels would have a combined value of \$203,531, which falls above the market value reflected by their assessment of \$161,570. Based on this record, 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: _____

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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