FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Dzmitry Beliayeu
DOCKET NO.: 23-54580.001-R-1
PARCEL NO.: 04-09-302-029-0000

The parties of record before the Property Tax Appeal Board are Dzmitry Beliayeu, the appellant(s), by attorney Steven Kandelman, of Rieff Schramm Kanter & Guttman 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 ***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:	$24,894
IMPR.:	$41,606
TOTAL:	$66,500

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 2023 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 two-story dwelling of frame and masonry construction with 4,197 square feet of living area. The dwelling was 22 years old. Features of the home include a full basement, central air conditioning, a fireplace, and a three-car garage. The property has a 16,596 square foot site and is located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance. The appellant disclosed that this is an owner-occupied residence.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on November 12, 2020, for a price of $665,000. Appellant submitted Section IV – Recent Sale Data of the Residential Appeal form asserting that the property was not transferred between family members or related corporations, was sold using a realtor, was advertised for sale on the multiple listing services for over 30 days, and was not sold due to a foreclosure action or by using a contract for deed. Appellant submitted a copy of a warranty deed and a settlement statement. Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $110,000. The subject's assessment reflects a market value of $1,100,000 or $262.09 per square foot of living area, land included, when using the level of assessments 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 sales properties which sold from July 2022 to June 2023 for sales prices from $1,430,000 to $1,810,000 or from $313.25 to $457.52 per square foot of living area, land included. These properties were in the same neighborhood code as the subject, with one in the same subarea and one within a ¼-mile of the subject. The improvements were from 1 to 25 years old and had from 3,825 to 4,565 square feet of living area. Board of review asserted in its notes on appeal that the subject sale was featured in an online listing which read, “it is being sold ‘as is’ for this great price.” Based on this evidence the board of review requested confirmation of the subject’s assessment.

The appellant submitted written rebuttal to the evidence offered by the board of review which asserted that the board of review reduced the assessment for the subject in the 2024 lien year and included a PTAX-203 Illinois Real Estate Transfer Declaration for the sale.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the purchase of the subject property in November 2020 for a price of $665,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a Realtor, the property had been advertised on the open market with the multiple listing service, and it had been on the market for over 30 days. In further support of the transaction the appellant submitted a copy of the settlement statement.

The Board gives no weight to the appellant’s rebuttal evidence. The appellant submitted evidence that the board of review took action on the assessment of the subject property for the 2024 lien year, not the instant lien year of 2023; and the appellant submitted a PTAX-203 form in rebuttal having never submitted this evidence originally. “All proceedings before the Property Tax Appeal Board shall be considered de novo meaning the Board will consider only the evidence, exhibits, and briefs submitted to it, and will not give any weight or consideration to any prior actions by a local board of review or to any submissions not timely filed or not specifically made part of the record." 86 Ill.Admin.Code §1910.50(a). The Board gives little weight to the assertion by the board of review in its notes on appeal that the subject property was sold in 'as is' condition. No evidence was offered by the board of review to support this assertion.

The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present sufficient evidence to challenge the arm's length nature of the transaction or sufficient evidence to refute the contention that the purchase price was reflective of market value. Based on this record the Board finds the subject property had a market value of $665,000 as of January 1, 2023. Since market value has been determined the level of assessments for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply, and the total assessment for the subject property will be reduced to $66,500. 86 Ill.Admin.Code §1910.50(c)(2).

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: July 21, 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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