

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Daniel Restrepo & Christine Betsill

DOCKET NO.: 21-28583.001-R-1 through 21-28583.002-R-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Daniel Restrepo & Christine Betsill, the appellant(s), by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. 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
21-28583.001-R-1	14-31-111-039-1001	5,449	55,616	\$61,065
21-28583.002-R-1	14-31-111-039-1002	5,449	55,616	\$61,065

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 consists of two condominium units within a two-unit condominium building. The property is located in Chicago, west Township, Cook County and is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal which estimated the subject's market value as of January 1, 2021, of \$800,000. The appraiser described the subject as two, 120-years old, one-story, masonry, two-bedroom, two-bath units with a total of 2,100 square feet of living area. The appraiser disclosed an inspection date of August 30, 2021. Included in the appraisal are exterior photographs of the subject that show a three-story building, and interior photographs titled as "typical". The sketch of the property lists the dimensions for the first and second floor and discloses that each unit contains 1,050 square feet. The appraiser utilized the sales comparison

approach to value to estimate the subject's market value. The appraiser opined the highest and best use of the property as improved is continuation of its present use.

Under the sales comparison approach, the appraiser analyzed four sales in arriving at the estimate of value. The sales properties are described as second or third floor, two bedroom and two bath, condominium units ranging in size from 1,500 to 2,200 square feet of building area. They sold from May 2019 to August 2020 for prices ranging from \$442,500 to \$447,000 or from \$202.27 to \$300.00 per square foot of building area. After making adjustments for pertinent factors, the appraiser estimated a value for each subject unit under the sales comparison approach of \$440,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the assessment of \$122,130 which reflects a market value of \$1,221,300 using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of the current assessment, the board of review submitted a memo asserting that the appraisal has inconsistencies with both the listing and photographs for one of the units. The board included a printout from two multiple listing service sheets (MLS) for the sale of unit #1. The 2003 MLS lists the subject as a duplex model, six rooms, three bedrooms and with approximately 1,500 square feet of living area. The second MLS from a 2006 canceled sale, lists the unit is listed as containing 1,600 square feet of living area. An MLS for unit #2 was submitted for a 2003 sale which lists the unit as containing 1,600 square feet of living area, six rooms, and a basement. The board of review noted the property was divided into two condominium unit parcels in 2004 and included a Redfin estimate for unit #1 listing three bedrooms and 1,600 square feet of living area. The board also included three sales comparables. The two-bedroom, two bath condominium units containing from 1,349 to 1,600 square feet of living area sold from February to December 2022 for prices ranging from \$550,250 to \$737,500.

## **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 that the appraisal has conflicting information on the description of the subject that effects the adjustments that the appraisers made. Therefore, the Board will give no weight to these adjustments and final conclusions of value. The Board will look to the raw sales data submitted by both parties to determine the best evidence of market value. The parties submitted a total of seven comparables. These comparables ranged in size from 1,349 to 2,200 square feet of living area. They sold from May 2019 to December 2022 for prices from \$442,500 to \$737,500. After adjustments to the comparables for pertinent factors the Board finds that the subject's assessment is supported. The Board further finds the appellant failed to show by a preponderance of the evidence that the subject was overvalued and a reduction based on market value is not warranted.

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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.

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Member	Member
Dan Dikini	Sarah Bokley
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:	June 17, 2025
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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 <u>PETITION AND EVIDENCE</u> 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**

State of Illinois Property Tax Appeal Board William G. Stratton Building, Room 402 401 South Spring Street Springfield, IL 62706-4001

## **APPELLANT**

Daniel Restrepo & Christine Betsill, by attorney: Brian P. Liston Law Offices of Liston & Tsantilis, P.C. 200 S. Wacker Drive Suite 820 Chicago, IL 60606

## **COUNTY**

Cook County Board of Review County Building, Room 601 118 North Clark Street Chicago, IL 60602