



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

APPELLANT: Felipe Colorado  
DOCKET NO.: 21-31089.001-R-1  
PARCEL NO.: 17-19-313-046-0000

The parties of record before the Property Tax Appeal Board are Felipe Colorado, the appellant, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; 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:** \$9,375  
**IMPR.:** \$34,650  
**TOTAL:** \$44,025

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 a 2-story multi-family building<sup>1</sup> of masonry exterior construction with 2,772 square feet of building area that was constructed in 1888, is approximately 133 years old and features an unfinished basement. The property has an approximately 3,125 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity with respect to the improvement assessment as the bases of the appeal.

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<sup>1</sup> The Board finds the best description of the subject's story height was found in the appellant's appeal petition and grid analysis which reports the building to be 2-story in design.

In support of the overvaluation argument, the appellant submitted information on three comparable sales located in the same assessment neighborhood code and within 0.48 of a mile from the subject property. The comparables have sites with 2,976 or 3,125 square feet of land area and are improved with 2-story class 2-11 multi-family buildings of frame or masonry exterior construction ranging in size from 2,695 to 3,108 square feet of building area. The buildings were constructed in 1888 or 1892. Each comparable has a basement, one of which is finished with an apartment and one property has central air conditioning. The comparables sold from March 2020 to October 2021 for prices ranging from \$362,000 to \$580,101 or from \$122.27 to \$215.25 per square foot of building area, land included.

In support of the inequity argument the appellant submitted information on eight equity comparables located in the same assessment neighborhood code as the subject. The comparables are improved with class 2-11 multi-family buildings of frame or masonry exterior construction ranging in size from 2,496 to 2,880 square feet of building area. The buildings were constructed from 1888 to 1893. Each comparable has an unfinished basement. The comparables have improvement assessments ranging from \$31,625 to \$37,550 or from \$12.47 to \$13.09 per square foot of building area.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$36,757. The requested assessment reflects a total market value of \$367,570 or \$132.60 per square foot of building area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The request would lower the subject's improvement assessment to \$27,382 or \$9.88 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$75,000 which reflects a market value of \$750,000 or \$270.56 per square foot of building area, land included. The subject property has an improvement assessment of \$65,625 or \$23.67 per square foot of building area. In support of its contention of the correct assessment on both overvaluation and inequity grounds, the board of review submitted information on three equity comparables located in the same assessment neighborhood code as the subject property and within ¼ of a mile from the subject. The comparables are improved with 2-story class 2-11 multi-family buildings of frame or masonry exterior construction ranging in size from 1,586 to 1,806 square feet of building area. The buildings range in age from 22 to 128 years old. Two comparables have a basement with finished area and one building has a crawl space foundation. Two buildings have central air conditioning and one property has a 2-car garage. Comparable #2 sold in August 2018 for a price of \$1.00. The comparables have improvement assessments ranging from \$40,592 to \$63,358 or from \$25.59 to \$35.08 per square foot of building area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In rebuttal, the appellant argued board of review comparables #1 and #2 are not comparable to the subject due to differences in age and building size. The appellant argued board of review comparable #3 to be an acceptable equity comparable which supports a reduction in the subject's assessment based on building assessment per square foot.

### **Conclusion of Law**

The appellant contends, in part, 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, based on overvaluation, is warranted.

The parties submitted a total of four comparable sales for the Board's consideration. The Board gives less weight to appellant comparable #2 which has a finished basement in contrast to the subject's unfinished basement. The Board gives no weight to board of review comparable #2 which was reported to have sold for \$1.00 in August 2018, which the Board finds to be unlikely to reflect an arm's length transaction.

The Board finds the best evidence of market value to be appellant comparables #1 and #3 which are more similar to the subject in location, age, classification, building size and other features. These two properties sold in March 2020 and October 2021 for prices of \$362,000 and \$380,000 or \$122.27 and \$132.60 per square foot of building area, land included. The subject's assessment reflects a market value of \$750,000 or \$270.56 per square foot of building area, land included, which falls above the two best comparable sales in the record. After considering adjustments to the two best comparables for differences from the subject, the Board finds the subject's assessment is excessive and a reduction based on overvaluation is warranted.

The appellant also 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). After considering the reduction to the subject's assessment based on overvaluation, the Board finds a further reduction in the subject's assessment based on uniformity 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: June 17, 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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