FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Brandon Wamsat
DOCKET NO.: 21-38919.001-R-1
PARCEL NO.: 14-30-402-063-1007

The parties of record before the Property Tax Appeal Board are Brandon Wamsat, the appellant, by Dimitrios Trivizas, attorney-at-law of Dimitrios P. Trivizas, Ltd. in Skokie, 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:	$9,492
IMPR.:	$37,507
TOTAL:	$46,999

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 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 residential condominium unit located in a four-story, ten-unit, condominium building of brick construction. The building is approximately 11 years old. The condominium unit has 1,800 square feet of living area with central air conditioning, one fireplace and two bathrooms. The subject property has an 11.42% ownership interest in the condominium. The property has a 6,072 square foot site located in Chicago, Lake View Township, Cook County. The subject 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 information on four comparable sales of residential condominium units in the subject's condominium building each with 1,800 square feet of living area, central air conditioning, one fireplace and two bathrooms. The condominium units have either an 11.41%

or 11.42% ownership interest in the condominium. The sales occurred from March 2015 to January 2021 for prices ranging from $430,000 to $447,000 or from $238.89 to $248.33 per square foot of living area, land included. The appellant also submitted evidence disclosing the subject property was purchased in October 2016 for a price of $440,000. Based on this evidence the appellant requested the subject's total assessment be reduced to $43,838.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $46,999. The subject's assessment reflects a market value of $469,990 when applying the 10% level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted a document titled Condominium Analysis Results for 2021 for the subject's condominium complex. The condominium analysis included 2 sales of residential condominium units in the subject's condominium that had 11.41% and 11.42% ownership interest in the condominium, respectively, with a total interest in the condominium of 22.83%. The analysis included appellant's comparable sale #3. The two units were reported to have sold in March 2021 and September 2021 for prices of $447,000 and $580,000, respectively. The board of review indicated the total adjusted consideration for the units was $1,027,000 and the percentage of interest of the units sold totaled 22.83%. Dividing the total adjusted consideration by the percentage of interest of the units sold resulted in an estimated market value for the subject's condominium complex of $4,498,467. Multiplying the market value of the complex by the subject's percentage of interest of 11.42% resulted in an estimated market value for the subject condominium unit of $513,725 and a total assessment of $51,372 when using the level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

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

The Board gives less weight to the sale of the subject property and appellant's comparable sales #1, #2 and #4 as these properties sold in 2015 or 2016, not as proximate in time to the assessment date as the two best sales in this record. The Board finds the best evidence of market value to be the analysis submitted by the board of review that included two sales of residential units in the subject's condominium, one of which was also identified by the appellant. The two condominium units sold in March 2021 and September 2021 for prices of $447,000 and $580,000, respectively. The subject's assessment reflects a market value of $469,990, which is bracketed by the two best sales in the record. Accepting the board of review analysis of these two sales and the corresponding percentages of ownership interest in the condominium of these two sales, the board of review arrived at an estimated market value for the subject property of $513,725, which is greater than the market value reflected by the subject's assessment. Based on this evidence the Board finds the subject’s assessment is reflective of the property’s fair cash value 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:

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: February 18, 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

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

APPELLANT

Brandon Wamsat, by attorney:
Dimitrios Trivizas
Dimitrios P. Trivizas, Ltd.
4957 Oakton Street
No. 217
Skokie, IL 60077

COUNTY

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