



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

APPELLANT: Cristal Espana
DOCKET NO.: 21-46395.001-R-1
PARCEL NO.: 17-32-217-053-0000

The parties of record before the Property Tax Appeal Board are Cristal Espana, the appellant, by attorney Joanne Elliott of Elliott & Associates Attorneys, PLLC in Des Plaines; 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: \$12,096
IMPR.: \$68,382
TOTAL: \$80,478

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 improvements situated on one parcel.¹ Improvement #1 is described as a class 2-11, three-story multi-family building of masonry exterior construction with 3,692 square feet of gross building area. The building is approximately 130 years old. Features of the building include a full unfinished basement, central air conditioning and three full bathrooms. The board of review described Improvement #2 as a class 2-02, one-story dwelling of masonry exterior construction with 845 square feet of living area. The home features a full

¹ The board of review disclosed in the "Board of Review-Notes on Appeal" that there are two improvements on the property, a class 2-11 multi-family building and also a class 2-02 dwelling, which was not disclosed or refuted by the appellant. For ease of reference, the Board has numbered the class 2-11 building as improvement #1 and the class 2-02 dwelling as improvement #2. Some descriptive details about the improvements are found in the subject's Multiple Listing Service (MLS) printout associated with the subject's 2018 sale, provided by the board of review.

unfinished basement, central air conditioning and one full bathroom. The parcel has a 3,024 square foot site and is located in Chicago, South Chicago Township, Cook County.

The appellant contends assessment inequity with respect to only Improvement #1 as the basis of the appeal. In support of this argument the appellant submitted information on ten equity comparables that have the same assessment neighborhood code as the subject. The comparables are class 2-11 properties that are improved with multi-family buildings of masonry or frame and masonry exterior construction ranging in size from 3,339 to 4,032 square feet of gross building area. The dwellings are from 109 to 135 years old. The comparables each have a partial or full unfinished basement and either three or four full bathrooms. One comparable has two additional half bathrooms and three comparables each have a two-car garage. The comparables have improvement assessments that range from \$21,500 to \$31,096 or from \$6.38 to \$7.81 per square foot of living area.

The property information printout provided by the appellant revealed the subject property is improved with a class 2-11 building and a class 2-02 dwelling. However, descriptive information was only provided for the class 2-11 building.

Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$80,478. The subject property has a combined total improvement assessment of \$68,382 for both Improvement #1 and Improvement #2 or \$15.07 per square foot of gross building area, when using the combined total square footage of 4,537 square feet for both buildings.

The board of review also indicated that Improvement #1 has an assessment of \$31,382 or \$8.50 per square foot of gross building area, when using 3,692 square feet and Improvement #2 has an assessment of \$37,000 or \$43.78 per square foot of living area, when using 845 square feet. The board of review disclosed the subject was sold in December 2018 for \$730,000. A copy of the MLS listing described the subject's three-flat was completely gutted and rehabbed less than 13 years ago. The building has separate HVAC and laundry for each unit. Each unit has hardwood floors, as well as updated baths and kitchen. The coach house was completely redone with newer floors, kitchen and bathrooms.

In support of its contention of the correct assessment for Improvement #1, the board of review submitted information on four equity comparables that have the same assessment neighborhood code as the subject. The comparables are class 2-11 properties that are improved with multi-family buildings of masonry exterior construction ranging in size from 3,612 to 3,906 square feet of gross building area. The dwellings are from 123 to 133 years old. Two comparables each have a concrete slab found and two comparables each have a full unfinished basement. Each comparable has four or six full bathrooms, two comparables have central air conditioning and one comparable has a two-car garage and either three or four full bathrooms. The comparables have improvement assessments that range from \$32,400 to \$40,352 or from \$8.97 to \$10.33 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer 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). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted fourteen suggested comparables for the Board's consideration. The Board finds none of the comparables are truly similar to subject, as none have a separate second dwelling, like the subject. The comparables have the same assessment neighborhood code as the subject but the multi-family buildings have varying degrees of similarity in building size, design, age and features, when compared to the subject's Improvement #1, suggesting adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables have improvement assessments ranging from \$21,500 to \$40,352 or from \$6.38 to \$10.33 per square foot of gross building area. The subject's total improvement assessment of \$68,382 for both Improvement #1 and Improvement #2 or \$15.07 per square foot of gross building area is greater than the improvement assessments of the comparables contained in the record.² The subject's higher improvement assessment appears to be logical given the subject property has a separate second dwelling. Therefore, based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

² The board of review also indicated that Improvement #1 has an assessment of \$31,382 or \$8.50 per square foot of gross building area, when using 3,692 square feet of gross building area, which was not refuted by the appellant. Improvement #1's assessment falls within the range established by the class 2-11 multi-family buildings submitted by both parties.

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

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