



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

APPELLANT: John Thurston
DOCKET NO.: 21-36951.001-R-1
PARCEL NO.: 17-21-123-026-0000

The parties of record before the Property Tax Appeal Board (PTAB) are John Thurston, the appellant, by attorney John P. Brady, of Tully & Associates, LTD. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, PTAB hereby finds **No Change** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

LAND: \$18,261
IMPR.: \$94,362
TOTAL: \$112,623

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a Cook County Board of Review decision pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) contesting 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 2,916 square feet building of masonry construction on a 4,058 square feet parcel in Chicago, West Chicago Township, Cook County. The 14-year-old, class 2-78 residence per the Cook County Real Property Assessment Classification Ordinance featured three bathrooms, air conditioning, a two-car garage, and a full basement.¹

The appellant pleads assessment inequity as the basis of the appeal, arguing that the subject improvement assessment should be reduced to \$26.22 per living square foot. To show subject assessment nonuniformity, the appellant presented information on six class 2-78 properties on the subject's street. These suggested comparables each included a 2.5-car garage, air conditioning, a

¹ The Property Tax Appeal Board (PTAB) notes inconsistencies between the appellant's description of the subject and the board of review's description. After holistically considering all evidence in the record, PTAB concludes the inconsistencies are immaterial to the outcome.

full basement, and two or three bathrooms. The appellant's selections all had 15-year-old improvements that were 2,154 to 2,916 square feet in area and \$26.22 to \$31.38 per living square foot in assessment.

The board of review countered that the subject improvement assessment of \$94,362, or \$32.36 per living square foot, was equitable in its "Notes on Appeal." In defense of the \$112,623 total subject assessment, the county board of review introduced into evidence four masonry improvements within a quarter mile of the subject as assessment comparables. The county board of review's preferred comparators contained 3.5 bathrooms, air conditioning, a 2.5-car garage, and a full basement. These 15-year-old improvements were 2,876 or 2,916 square feet in size and \$33.84 to \$35.84 per living square foot in improvement assessment.

At hearing, the appellant emphasized that all six of the appellant's comparables were on the same block as the subject, and opined that appellant comparables #5 and #6 were most similar to the subject. The board of review asked that Property Tax Appeal Board Standing Order No. 3 apply before resting on the evidence.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. The Illinois Constitution requires real estate taxes "be levied uniformly by valuation ascertained as the General Assembly shall provide by law." Ill. Const., art. IX, § 4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). Yet this uniformity provision of the Illinois Constitution does not mandate absolute equality in taxation; instead, a reasonable degree of uniformity in the taxing authority's assessments suffices. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When unequal treatment in the assessment is the basis of a property tax appeal, appellants must prove assessment inequity by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e); Walsh, 181 Ill. 2d at 234 (1998). Clear and convincing evidence means more than a preponderance of the evidence, but it does not need to approach the degree of proof required for a criminal conviction. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). Proof of unequal treatment in the assessment process should comprise documentation for the year in question of similarly situated properties of compelling proximity to, and with a lack of distinguishing characteristics from, the assessment subject. 86 Ill.Admin.Code §1910.65(b). The Property Tax Appeal Board (PTAB) finds the appellant did not overcome this burden of proof.

By virtue of their identical living area to the subject improvement, board of review comparables #3 and #4 and appellant comparables #5 and #6 constitute the best evidence of assessment equity in this record. In addition to exactly matching the subject's living square footage, these properties mirrored the subject's amenities, except that appellant comparables #5 and #6 lacked the subject's bathroom utility. Given these properties, PTAB concludes the subject improvement would be equitably assessed between \$30.79 and \$35.84 per living square foot. Because the subject's \$32.36 per improvement square foot assessment lands inside the equitable range, PTAB finds the appellant did not prove assessment inequity by clear and convincing evidence or that a subject assessment reduction is 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: _____

September 15, 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

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