



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

APPELLANT: Paul A. Garcia
DOCKET NO.: 23-42142.001-R-1
PARCEL NO.: 13-28-113-001-0000

The parties of record before the Property Tax Appeal Board are Paul A. Garcia, the appellant, by Brian P. Liston, attorney-at-law 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:

LAND: \$6,790
IMPR.: \$25,625
TOTAL: \$32,415

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 2023 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 is improved with a two-story multi-family building of masonry construction containing 3,328 square feet of building area. The building is approximately 96 years old. Features of the property include four units, a full basement, four bathrooms, and a 2-car garage. The property has a 4,527 square foot site located in Chicago, Jefferson Township, Cook County. The subject is a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables composed of class 2-11 properties improved with two-story buildings of masonry exterior construction that range in size from 4,004 to 4,170 square feet of building area. The buildings range in age from 96 to 98 years old. Each property has four units, a full basement, 4 or 4½

bathrooms, and a 2-car garage. These properties have the same assessment neighborhood code as the subject property and are located from .8 of a mile to 1 mile from the subject property. Their improvement assessments range from \$23,413 to \$25,803 or from \$5.85 to 6.24 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$19,802.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$32,415. The subject property has an improvement assessment of \$25,625 or \$7.70 per square foot of building area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables composed of class 2-11 properties improved with two-story buildings of masonry or frame and masonry exterior construction that range in size from 2,272 to 2,416 square feet of building area. The buildings range in age from 93 to 96 years old. Each property has a full basement with one having finished area, two or three bathrooms, and a 1.5-car or 2-car garage. These properties have the same assessment neighborhood code as the subject property and are located in the same assessment block as the subject. Comparables #1 and #2 are located along the same street as the subject property. The comparables have improvement assessments ranging from \$19,771 to \$29,375 or from \$8.50 to \$12.93 per square foot of building area..

Conclusion of Law

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

The parties submitted information on seven comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The comparables are improved with buildings similar to the subject in age and most features. The Board finds, however, that none of the comparables are similar to the subject building in size with the appellant's comparables ranging from approximately 20% to 25% larger than the subject building while the board of review comparables are from approximately 27% to 32% smaller than the subject building, requiring adjustments to make these properties more similar to the subject in size. The Board finds that the board of review comparables are more similar to the subject in location which gives more credibility to this evidence. Nevertheless, these seven comparables have improvement assessments ranging from \$19,771 to \$29,375 or from \$5.85 to \$12.93 per square foot of building area. The subject's improvement assessment of \$25,625 or \$7.70 per square foot of building area falls within the range established by the comparables submitted by the parties indicating the subject is not being inequitably assessed notwithstanding the size differential. Based on this record 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.

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:

March 17, 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

AGENCY

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

APPELLANT

PAUL A. GARCIA, 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