



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

APPELLANT: Jeffrey R. Gustafson  
DOCKET NO.: 23-53153.001-R-1  
PARCEL NO.: 15-22-305-013-0000

The parties of record before the Property Tax Appeal Board are Jeffrey R. Gustafson, the appellant, by attorney William I. Sandrick, of Sandrick Law Firm, LLC in Homewood; 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:** \$2,578  
**IMPR.:** \$44,421  
**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 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 consists of a 2-story multi-family building of masonry exterior construction with 4,928 square feet of gross building area that is approximately 64 years old. The building includes six apartment units; five of which are 2 bedroom/1 bathroom and one has a 1 bedroom/1 bathroom layout. Other features of the property include a basement finished with an apartment and an asphalt parking surface. The property has an approximately 4,688 square foot site or a 1:1 land-to-building ratio and is located in Broadview, Proviso 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 as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$330,000 as of January 1, 2023. The appraisal was prepared by David M. Richmond, a Certified General

Real Estate Appraiser. The intended use of the appraisal was to estimate the market value of the subject “in order to establish an equitable ad valorem tax assessment.”

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value selecting six comparable sales located in Broadview, Maywood or Bellwood. The comparables have land-to-building ratios ranging from 1:1 to 2.13:1, with five to eight 1 and 2 bedroom apartment units and are improved with 1-story or 2-story buildings. The appraiser rated the comparables inferior, superior or similar in condition, when compared to the subject’s average condition rating. The comparables sold from September 2020 to October 2021 for prices ranging from \$250,000 to \$430,000 or from \$40,625 to \$66,667 per rental unit, land included.

The appraiser adjusted the comparables for differences from the subject in number of rental units, story height, condition, and/or location arriving at adjusted per unit sale prices of the comparables ranging from \$52,813 to \$56,438 and a per unit opinion of market value for the subject of \$55,000 or a market value of \$330,000 for the subject property. Based on this evidence, the appellant requested the subject’s assessment be reduced to reflect the appraised value when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

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 or \$95.37 per square foot of gross building area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on three comparables located in Broadview. Board of review comparable #4 is the same property as board of review comparable #1 and shall not be further discussed or analyzed. Comparables #1, #2 and #3 have sites that range in size from 3,150 to 9,450 square feet of land area and are improved with 2-story class 2-11 buildings of masonry or frame and masonry exterior construction ranging in size from 4,081 to 4,602 square feet of gross building area and are 56 or 61 years old. Two comparables have a basement finished with an apartment and one comparable has a concrete slab foundation. The comparables sold from May 2022 to July 2023 for prices ranging from \$253,756 to \$425,000 or from \$55.14 to \$102.92 per square foot of gross building area, land included. Based on this evidence, the board of review requests the subject’s assessment be confirmed.

### **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 appellant submitted an appraisal and the board of review submitted three comparable sales for the Board's consideration. The Board finds the comparables selected by the appraiser sold from 15 to 28 months prior to the January 1, 2023 assessment date when more recent sales of multi-family buildings were available, as demonstrated by the board of review's comparable sales. As a result, less weight is given to the opinion of value for the subject as presented in the appraisal. The Board also gives less weight to board of review comparable #1 which appears to be an outlier based on its sale price relative to other properties in the record.

The Board finds the best evidence of market value to be board of review comparables #2 and #3 which sold proximate to the January 1, 2023 assessment date and are similar to the subject in location, age and some features. Although these properties present varying degrees of similarity to the subject in building size and foundation type, suggesting adjustments are needed to make these properties more equivalent to the subject. These two comparables sold in May 2022 and July 2023 for prices of \$420,000 and \$425,000 or \$95.68 and \$102.92 per square foot of gross building area, including land. The subject's assessment reflects a market value of \$469,990 or \$95.37 per square foot of gross building area, including land, which falls above the two best comparable sales in terms of overall market value and below the two best comparables on a per square foot basis. After considering adjustments to the comparables for differences from the subject, the Board finds 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:

May 19, 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

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