



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

APPELLANT: Alberto Ramos
DOCKET NO.: 23-56121.001-R-1
PARCEL NO.: 13-26-315-001-0000

The parties of record before the Property Tax Appeal Board are Alberto Ramos, the appellant, by Dora Cornelio, attorney-at-law of Schmidt Salzman & Moran, Ltd. 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: \$36,312
IMPR.: \$48,154
TOTAL: \$84,466

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a final administrative decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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 building of masonry exterior construction containing 9,072 square feet of building area. The building is approximately 112 years old. Features of the property include an unfinished basement, central air conditioning, three bathrooms, and a 3-car garage. The property has a 10,375 square foot site located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-12 mixed use commercial/residential 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 five equity comparables composed of class 2-12 properties improved with two-story or three-story buildings of masonry, frame or frame and masonry exterior construction that range in size from 7,260 to

8,944 square feet of building area. The buildings are from 61 to 128 years old. Each property has a full unfinished basement and four or six bathrooms. Three comparables have central air conditioning, and three comparables have a 1-car, 2-car or 2.5-car garage. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$27,355 to \$41,118 or from \$3.52 to \$4.60 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$43,092, which is equivalent to the improvement assessment as established by the Property Tax Appeal Board for the 2021 tax year in Docket No. 21-51067.001-R-1.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$84,466. The subject property has an improvement assessment of \$48,154 or \$5.31 per square foot of living area. The board of review also indicated that 2021 was the first year of the general assessment cycle for the subject property.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables composed of class 2-12 properties improved with two-story or three buildings of masonry or frame and masonry exterior construction that range in size from 7,580 to 8,970 square feet of building area. The buildings are from 107 to 125 years old. Each property has a partial unfinished basement, two comparables have central air conditioning, and two comparables each have a 2-car garage. The comparables have 2, 3, 4 or 5 full bathrooms and three comparables have an additional 1, 2 or 3 half bathrooms. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments ranged from \$46,125 to \$52,378 or from \$5.29 to \$6.91 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 meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on nine equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparables #1, #2 and #4 due to differences from the subject in building size. The Board gives less weight to board of review comparable #1 due to differences from the subject in building size. The Board finds the best evidence of assessment equity to be appellant's comparables #3 and #5 as well as board of review comparables #2, #3 and #4 that are improved with two-story or three-story buildings that are similar to the subject in size containing from 8,689 to 8,970 square feet of building area. The comparables have varying degrees of similarity to the subject in features that would require adjustments to make them more equivalent to the subject property. Four of the comparables have 1 or 1½ more bathrooms than the subject, indicating each would require a downward adjustment to make them more equivalent to the subject for this difference. Conversely, three of the comparables have no central air conditioning

which is a feature of the subject property, and each comparable has less garage space than the subject, indicating each comparable would require an upward adjustment to make the property more equivalent to the subject for these differences. These comparables have improvement assessments that range from \$38,600 to \$52,062 or from \$4.39 to \$5.95 per square foot of building area. The subject's improvement assessment of \$48,154 or \$5.31 per square foot of building area falls within the range established by the best comparables in this record. Based on this record, after considering the appropriate adjustments to the best comparables, 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

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