FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jon Gerstein
DOCKET NO.: 24-46648.001-R-1
PARCEL NO.: 13-12-308-017-0000

The parties of record before the Property Tax Appeal Board are Jon Gerstein, the appellant; 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:	$13,313
IMPR.:	$48,688
TOTAL:	$62,001

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 2024 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 two-story multi-family building of masonry exterior construction with 3,032 square feet of gross building area. The building was constructed in 1924 and is approximately 100 years old. Features of the building include a full basement, two bathrooms and a 2-car garage. The property has a 3,750 square foot site and is located in Chicago, Jefferson 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 assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted a grid analysis with information on the subject and four equity comparables, as well property characteristic printouts for the subject and the comparables. The comparables have the same assessment neighborhood code as the subject and are located along the same street and less than .1 of a mile from the subject property. The comparables are class 2-11 properties improved with two-story multi-family buildings of masonry exterior construction ranging in size from 3,068 to 4,943 square feet of gross building area. The buildings are 100 or 101 years old. Each comparable has a full basement, two or three full bathrooms and a 2-car garage. Two comparables each have one or two additional half bathrooms. The comparables have improvement assessments that range from $47,688 to $59,356 or from $12.01 to $15.54 per square foot of gross building area. 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 $62,001. The subject property has an improvement assessment of $48,688 or $16.06 per square foot of gross building area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables that have the same assessment neighborhood code as the subject and are located within the same block and/or along the same street as the subject or approximately ¼ of a mile from the subject property. The comparables are class 2-11 properties improved with two-story multi-family buildings of masonry exterior construction ranging in size from 2,550 to 3,006 square feet of gross building area. The buildings are from 102 to 104 years old. One comparable has a concrete slab foundation and three comparables each have a full basement, one of which has finished. Each comparables has two full bathrooms and one comparable has two additional half bathrooms. One comparable has central air conditioning and three comparables each have either a 2-car or a 2.5-car garage. The comparables have improvement assessments that range from $43,688 to $53,356 or from $16.66 to $19.40 per square foot of gross building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant argued that the board of review comparables rank among the highest improvement assessments per square foot in the neighborhood. The appellant asserted that the board of review incorrectly listed the subject as having "warm air" heating, when it is actually equipped with an older hot-water boiler system with radiators, not gas forced. The appellant also asserted that the board of review incorrectly described the building at 5023 N. Mozart as having a "frame construction build on a slab, when in fact it is a full masonry brick building with a full basement."

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 eight comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables #2, #3 and #4, as well as board of review comparables #1, #3 and #4 which differ from the subject building in size. Additionally, board of review comparable #3 has no garage and board of review comparable #4 has no basement, both features of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparable #1 and board of review comparable #2, which are most similar to the subject in building size and design. However, board of review comparable #1 has central air conditioning and a larger garage capacity, indicating downward adjustments for these differences would be necessary to make this comparable more equivalent to the subject. Nevertheless, the comparables have improvement assessments of $47,688 and $53,356 or $15.54 and $17.75 per square foot of gross building area. The subject's improvement assessment of $48,688 or $16.06 per square foot of gross building area is bracketed by the two best comparables in the record. Based on this record and after considering adjustments to the best comparables for differences from 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.

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:

C E R T I F I C A T I O N

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: July 21, 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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