



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jose Pedraza
DOCKET NO.: 21-42226.001-R-1
PARCEL NO.: 17-28-310-034-0000

The parties of record before the Property Tax Appeal Board are Jose Pedraza, the appellant, by attorney Dora Cornelio, 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: \$13,310
IMPR.: \$27,637
TOTAL: \$40,947

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 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 multi-family building of masonry exterior construction with 1,706 square feet of gross building area.¹ The building is approximately 129 years old. Features include a basement apartment, 2½ bathrooms, central air conditioning, and a 2-car garage. The property has a 3,025 square foot site and is located in Chicago, South Chicago 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 regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity

¹ The parties' grid analyses indicated the subject is a 1-story building; however, the photographs depict the subject is other than a 1-story building. Furthermore, the board of review disclosed the subject has a basement apartment and 2½ bathrooms, which was not refuted by the appellant.

comparables located within the same assessment neighborhood code as the subject. According to the property characteristic printouts, the comparables consist of class 2-11, 2-story multi-family buildings of frame exterior construction ranging in size from 1,665 to 1,840 square feet of gross building area and are each 130 years old. Each comparable has a basement finished with recreation room and 2 bathrooms. One comparable has a 2-car garage. The comparables have improvement assessments ranging from \$11,994 to \$13,899 or from \$7.20 to \$7.55 per square foot of building area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment to \$12,556 or \$7.36 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$40,947. The subject property has an improvement assessment of \$27,637 or \$16.20 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 located within the same assessment neighborhood code as the subject and within the subject's same subarea or approximately ¼ of a mile from the subject. The comparables consist of class 2-11, 2-story multi-story buildings of masonry exterior construction ranging in size from 1,920 to 2,173 square feet of gross building area and are from 94 to 133 years old. Each comparable has an unfinished basement and 2 bathrooms. One comparable has a 2-car garage. The comparables have improvement assessments ranging from \$32,360 to \$46,250 or from \$16.34 to \$21.28 per square foot of gross building area. Based on this evidence the board of review requested confirmation of the subject's assessment.

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 record contains a total of eight equity comparables for the Board's consideration. The Board gives less weight to the board of review comparables #2 and #3 due to significant differences in their building size or newer age when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables and board of review comparable #1 which are relatively similar to the subject in location, building size, age, and some features. However, these comparables lack a half bathroom, central air conditioning, and/or a garage amenity suggesting upward adjustments would be appropriate for these features to make them equivalent to the subject. These comparables have improvement assessments ranging from \$11,994 to \$34,800 or from \$7.20 to \$18.13 per square foot of gross building area. The subject's improvement assessment of \$27,637 or \$16.20 per square foot of gross building area falls within the range established by the most similar comparables in this record. Based on this record and after considering appropriate 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 15, 2025



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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