



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

APPELLANT: PMI PROPERTIES  
DOCKET NO.: 24-26284.001-R-1  
PARCEL NO.: 17-20-416-020-0000

The parties of record before the Property Tax Appeal Board are PMI PROPERTIES, the appellant, by attorney Michael R. Davies of Ryan Law, PLLC 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:** \$18,963  
**IMPR.:** \$27,038  
**TOTAL:** \$46,001

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 frame exterior construction with 2,120 square feet of gross building area. The building is approximately 147 years old. Features of the property include a slab foundation and two full bathrooms. The property has a site with 5,125 square feet of land area and is located in Chicago, West 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 with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables that have the same assessment neighborhood code as the subject property and are located from .26 of a mile to 2.07 miles from the subject property, one of which is also along the same street as the subject. The comparables are class 2-11 properties improved with two-story

multi-family buildings of frame exterior construction ranging in size from 2,120 to 2,976 square feet of gross building area. The buildings are from 133 to 148 years old. Two comparables each have a full basement and three comparables each have a slab foundation. Each comparable has two or three full bathrooms. Comparable #3 has central air conditioning and two additional half bathrooms. Three comparables each have either a one-car or a two-car garage. The comparables have improvement assessments that range from \$15,039 to \$24,503 or from \$7.09 to \$9.77 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 final total assessment for the subject of \$46,001. The subject property has an improvement assessment of \$27,038 or \$12.75 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. The comparables have the same assessment neighborhood code as the subject. Three comparables are located approximately ¼ mile from the subject property, two of which are also located along the same street as the subject. The comparables are class 2-11 properties improved with two-story multi-family buildings of frame, masonry or frame and masonry exterior construction ranging in size from 1,760 to 2,246 square feet of gross building area. The buildings are from 141 to 157 years old. Two comparables each have a slab foundation and two comparables each have a full basement, one is finished with a formal recreation room. Each comparable has either two or four full bathrooms. Comparable #1 has a two-car garage. The comparables have improvement assessments that range from \$23,900 to \$37,049 or from \$12.99 to \$21.05 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 parties submitted nine 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 #3 and #4 which are less similar to the subject building in size than other comparables in the record and/or they have a basement foundation, unlike the subject's slab foundation. Additionally, board of review comparable #3 has central air conditioning, not a feature of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1 and #5, along with board of review comparables #1 and #2, which have the same assessment neighborhood code as the subject and are overall more similar to the subject in building size,

design, foundation type and age. However, the Board finds three of the four comparables each have a garage, unlike the subject, suggesting downward adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, these four comparables have improvement assessments ranging from \$15,039 to \$29,449 or from \$7.09 to \$13.94 per square foot of gross building area. The subject's improvement assessment of \$27,038 or \$12.75 per square foot of gross building area falls within the range established by the best comparables in the record.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill.2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which appears to exist on the basis of the evidence presented.

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: \_\_\_\_\_

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: \_\_\_\_\_

September 15, 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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