



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

APPELLANT: Pro Excavating Inc
DOCKET NO.: 24-55442.001-R-1
PARCEL NO.: 14-33-129-032-0000

The parties of record before the Property Tax Appeal Board are Pro Excavating Inc, the appellant, by attorney Michael R. O'Malley, 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: \$48,050
IMPR.: \$95,380
TOTAL: \$143,430

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 3-story, multi-family building of masonry exterior construction with 5,548 square feet of gross building area. The building is approximately one year old. Features include a full basement, 9½ bathrooms, central air conditioning, 2 fireplaces, and a 2-car garage. The property has a 3,100 square foot site and is located in Chicago, North 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 comparables, three of which are located within the same assessment neighborhood code as the subject. The comparables are improved with 2-story or 3-story, class 2-11 multi-family buildings of masonry exterior construction ranging in size from 2,261 to 4,795 square feet of gross building area. The

buildings are from 121 to 146 years old. One comparable has a slab foundation, and four comparables have full basements. Each comparable has 2 to 6 bathrooms, two comparables have central air conditioning, one comparable has 3 fireplaces, and three comparables have a 2-car garage. The comparables have improvement assessments ranging from \$27,443 to \$55,306 or from \$11.14 to \$13.18 per square foot of gross building area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$143,430. The subject property has an improvement assessment of \$95,380 or \$17.19 per square foot of gross building area.

In support of its contention of the correct assessment, the board of review submitted information on three comparables located within the same assessment neighborhood code as the subject. The comparables are improved with 2-story or 3-story, class 2-11 multi-family buildings of masonry exterior construction ranging in size from 2,397 to 4,100 square feet of gross building area. The buildings are from 51 to 156 years old. One comparable has a slab foundation, and three comparables each have a full basement. Each comparable has 3, 3½ or 5 bathrooms, two comparables have central air conditioning, one comparable has 2 fireplaces, and two comparables have either a 2-car or a 3-car garage. The comparables have improvement assessments ranging from \$60,104 to \$102,500 or from \$25.00 to \$25.22 per square foot of gross building area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 assessment neighborhood code as the subject property to support their respective positions. Both parties' comparables are significantly inferior to the subject given their older ages ranging from approximately 55 to 155 years older and their 14% to 60% smaller building sizes when compared to the subject. Additionally, the comparables have fewer bathrooms, and seven of the parties' comparables lack either a basement foundation, central air conditioning and/or a garage amenity, which are all features of the subject. Nevertheless, the Board finds none of the comparables in this record are truly similar to the subject and the significant upward adjustments required to the comparables for differences from the subject make it difficult to perform a meaningful comparative analysis. Nevertheless, these comparables have improvement assessments ranging from \$27,443 to \$102,500 or from \$11.14 to \$25.22 per square foot of gross building area. The subject's improvement assessment of \$95,380 or \$17.19 per square foot of gross building area falls within the range established by the comparables in this record. Based

on this record and considering the appropriate adjustments to the comparables when compared to the subject described above, 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: _____

October 20, 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 9-215 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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