



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

APPELLANT: Zhaoqiang Lai
DOCKET NO.: 21-30396.001-R-1
PARCEL NO.: 13-36-414-040-0000

The parties of record before the Property Tax Appeal Board are Zhaoqiang Lai, the appellant, by attorney Ciarra Schmidt, 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: \$9,652
IMPR.: \$63,347
TOTAL: \$72,999

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 three-story mixed use commercial and residential building of masonry exterior construction with 4,608 square feet of gross building area and which is approximately 18 years old. Features include a concrete slab foundation, 5 full bathrooms, and central air conditioning. The property has a 2,145 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-12 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant set forth a contention of law along with a brief and evidence contending assessment inequity concerning the improvement as the basis of the appeal along with property characteristics printouts that were used to correct/add data to the Section V grid analysis. In support of this argument, the appellant submitted information on five equity comparables.¹ The

¹ For ease of reference, the Board has renumbered the last property to comparable #5.

comparables are located in the same neighborhood code as the subject. The comparables consist of class 2-12 two-story or three-story buildings of masonry or frame and masonry exterior construction which range in age from 97 to 115 years old. The buildings range in size from 4,444 to 5,043 square feet of gross building area. Each building has a partial unfinished basement and from 3 to 4 ½ bathrooms, with two buildings having air conditioning and two comparables having 1.5-car and 2.5-car garages, respectively. The comparables have improvement assessments ranging from \$40,500 to \$48,282 or from \$9.11 to \$9.60 per square foot of gross building area. Based on this evidence, the appellant requested a reduced improvement assessment of \$43,269 or \$9.39 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 \$72,999. The subject property has an improvement assessment of \$63,347 or \$13.75 per square foot of gross building area.

In support of its contention of the correct assessment, the board of review submitted information on four properties which are located in the same neighborhood code as the subject and either in the subarea or within ¼ of a mile from the subject. The comparables consist of either class 2-11 or class 2-12 two-story or three-story buildings of masonry exterior construction which are 13 to 109 years old. The buildings range in size from 3,542 to 4,682 square feet of gross building area. Each comparable has a full or partial basement, three of which have finished area. Three comparables have air conditioning and two comparables have one-car and two-car garages, respectively. Features include from 3 to 6 bathrooms. The comparables have improvement assessments ranging from \$57,050 to \$74,675 or from \$13.75 to \$18.43 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 a total of nine suggested equity comparables in support of their respective positions before the Property Tax Appeal Board, none of which are particularly similar to the subject property in various characteristics such as classification, age and/or size. The Board has given reduced weight to the appellant's comparables along with board of review comparable #1, each of which differ significantly in age when compared to the 18-year-old subject. The Board has also given reduced weight to board of review comparable #2, which differs substantially in building size when compared to the subject.

The Board finds the best evidence of assessment equity to be board of review comparables #3 and #4, each of which are similar to the subject in location, story height, building size, age, and

some features. Each comparable necessitates adjustment for foundation type when compared to the subject. These best comparables have improvement assessments of \$62,329 and \$66,484 or of \$13.75 and \$14.20 per square foot of gross building area. The subject's improvement assessment of \$63,347 or \$13.75 per square foot of gross building area falls between the best comparables in this record in terms of overall improvement assessment and is identical to the lowest assessment on a per-square-foot basis.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. 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.

Based on this record and after considering appropriate adjustments to the best comparables for differences when compared to 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: _____

June 17, 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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