



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

APPELLANT: Wayne L. Tang  
DOCKET NO.: 21-38168.001-R-1  
PARCEL NO.: 14-29-200-048-0000

The parties of record before the Property Tax Appeal Board are Wayne L. Tang, the appellant, by Jessica Hill-Magiera, Attorney at Law, in Lake Zurich, 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:** \$11,160  
**IMPR.:** \$35,840  
**TOTAL:** \$47,000

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 two-story dwelling of stucco exterior construction with 1,081 square feet of living area. The dwelling is approximately 26 years old. Features of the home include a concrete slab foundation, 1½ bathrooms, central air conditioning, and an attached one-car garage. The property has a 744 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-95 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales located in the same neighborhood code as the subject and within .47 of a mile from the subject. The parcels range in size from 579 to 734 square feet and are each improved with a two-story dwelling of masonry exterior construction. The homes range in age from approximately 23 to 29 years old. The dwellings

range in size from 1,090 to 1,275 square feet of living area. The homes have from 1½ to 2½ bathrooms and central air conditioning. The comparables have either a 1-car or a 1.5-car garage. The comparables sold from July 2020 to June 2021 for prices ranging from \$336,500 to \$540,000 or from \$308.72 to \$423.53 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced improvement assessment of \$34,778 which would reflect a market value of \$347,780 or \$321.72 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$47,000. The subject's assessment reflects a market value of \$470,000 or \$434.78 per square foot of gross building area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in the same neighborhood code and comparable #1 is in the same tax block and street as the subject. The comparables consist of class 2-95 two-story dwellings of stucco, masonry or frame and masonry exterior construction that range in age from 22 to 27 years old. The homes range in size from 1,008 to 1,426 square feet of living area. Three comparables have full or partial basements with finished area and comparable #1 has a concrete slab foundation. The homes each have 1 bathroom and two homes each have 1 half-bath. Each dwelling has central air conditioning and comparable #4 has a fireplace. Comparables #1 and #4 each have a one-car garage. The comparables sold from October 2020 to December 2021 for prices ranging from \$526,000 to \$818,000 or from \$498.58 to \$620.79 per square foot of living area, including land.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, counsel for the appellant noted that no criticisms were presented to the appellant's comparable sales. As to the board of review sales, the appellant asserts that only comparable #1 is "acceptable" and is higher than the subject's estimated market value. Each of the remaining board of review comparables are deemed to be "not comparable" by the appellant as the properties differ in dwelling size, finished basement and/or lack a garage. Having examined all of the data, the appellant presented an analysis using the appellant's three comparables along with board of review comparable #1 and suggested the appropriate "median sale price" as applied to the subject would support an estimated market value of \$402,808 or \$372.63 per square foot of living area, including land, which would result in a total assessment of \$40,281.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). 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 seven comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #2 and #3 along with board of review comparables #2 and #3, which are dissimilar in dwelling size being approximately 10% to 32% larger in dwelling size when compared to the subject.

The Board finds the best evidence of market value in the record are appellant's comparable #1 as well as board of review comparables #1 and #4, which are each similar to the subject property in location, age, design, dwelling size, bathroom count, air conditioning and garage feature. Adjustments to the best comparable sales are necessary for differences in foundation and/or finished basement when compared to the subject in order to make the comparables more equivalent to the subject. The Board finds these comparables sold for prices ranging from \$336,500 to \$575,000 or from \$308.72 to \$570.44 per square foot of living area, including land. The subject's assessment of \$47,000 reflects a market value of \$470,000 or \$434.78 per square foot of living area, including land, which falls within the range of the best comparables in the record.

Based on this record and after considering appropriate adjustments to the best comparables for differences when compared to the subject property, the Board finds the appellant did not demonstrate by a preponderance of the evidence that the subject's was overvalued 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: \_\_\_\_\_

February 18, 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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