



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

APPELLANT: Nghia Nguyen
DOCKET NO.: 21-41726.001-R-1
PARCEL NO.: 19-10-404-055-0000

The parties of record before the Property Tax Appeal Board are Nghia Nguyen, 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: \$4,006
IMPR.: \$34,994
TOTAL: \$39,000

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 2-story multi-family building of masonry construction with 3,722 square feet of building area. The building is approximately 25 years old. Features include a full basement apartment, central air conditioning and a 2-car garage. The property has a 4,006 square foot site and is located in Chicago, Lake 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 subject's improvement as the basis of the appeal. In support of this argument the appellant submitted information on five comparable properties located within the same neighborhood code as the subject. The comparables are improved with 1.5-story or 2-story, class 2-11 buildings of frame or masonry construction ranging in size from 3,361 to 3,796 square feet of building area. The buildings

range in age from 67 to 111 years old. The comparables have full basements, four of which are finished as an apartment or a recreation room. Four comparables have from a 2-car to a 4-car garage. The comparables have improvement assessments ranging from \$13,750 to \$19,765 or from \$3.97 to \$5.66 per square foot of building area.

Based on this evidence the appellant requested that the subject's improvement assessment be reduced to \$18,833 or \$5.06 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal." The subject has a total assessment of \$39,000. The subject property has an improvement assessment of \$34,994 or \$9.40 per square foot of building area.

In support of its contention of the correct assessment the board of review submitted information on four comparable properties that are located within the same neighborhood code as the subject. The comparables are improved with 2-story or 3-story, class 2-11 buildings of masonry construction ranging in size from 3,420 to 3,864 square feet of building area. The buildings range in age from 17 to 26 years old. Three comparables have full basements, each of which is finished as an apartment, and one comparable has a slab foundation. Two comparables have central air conditioning. The comparables have improvement assessments ranging from \$34,815 to \$39,690 or from \$9.65 to \$10.27 per square foot of 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 Board finds the best evidence of assessment equity to be the board of review's comparables #1, #2 and #3. These comparables are similar to the subject in location, building classification, age, size and most features. However, each of the best comparables lacks a garage when compared to the subject. Nevertheless, the best comparables had improvement assessments of \$35,907 and \$39,690 or from \$9.65 to \$10.27 per square foot of building area. The subject's improvement assessment of \$34,994 or \$9.40 per square foot of building area is supported by the improvement assessments of the best comparables in this record. The Board gave less weight to the parties' remaining comparables, due to their lack of a basement foundation or their significantly older building when compared to the subject. Based on this record 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: _____

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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