



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

APPELLANT: Yongqu Yu  
DOCKET NO.: 21-42262.001-R-1  
PARCEL NO.: 17-28-220-040-0000

The parties of record before the Property Tax Appeal Board are Yongqu Yu, 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:** \$27,500  
**IMPR.:** \$79,500  
**TOTAL:** \$107,000

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 3-story multi-family building of masonry exterior construction with 7,320 square feet of gross building area. The building is approximately 49 years old. Features of the building include a basement with finished area, 7 full bathrooms, and a 2.5-car garage. The property has a 6,250 square foot site and is located in Chicago, South 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. According to the property characteristic printouts provided by the appellant, the comparables consist of 2-story or 3-story multi-family buildings of masonry exterior construction ranging in

size from 6,672 to 7,956 square feet of gross building area. The buildings are from approximately 116 to 135 years old. Each comparable has a full basement, four of which have finished area, and either 4 or 6 full bathrooms. Two comparables each have a 2-car garage. The comparables have improvement assessments that range from \$42,250 to \$53,486 or from \$6.07 to \$6.76 per square foot of gross building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$47,506 or \$6.49 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 \$107,000. The subject property has an improvement assessment of \$79,500 or \$10.86 per square foot of gross building area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables that have the same assessment neighborhood code as the subject property and are located within the subject's same subarea or approximately  $\frac{1}{4}$  of a mile from the subject property. The comparables consist of 2-story or 3-story multi-family buildings of masonry exterior construction ranging in size from 5,244 to 7,602 square feet of gross building area. The buildings are from 56 to 138 years old. Each comparable has a full unfinished basement, 3 or 6 full bathrooms, and either a 2-car or a 2.5-car garage. One comparable has central air conditioning. The comparables have improvement assessments that range from \$59,800 to \$93,250 or from \$10.97 to \$14.44 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 eight comparable properties for the Board's consideration, seven of which are considerably older in age, ranging from 112 to 135 years old, in comparison to the 48-year-old age of the subject building. Nevertheless, the parties' comparables have improvement assessments that range from \$42,250 to \$93,250 or from \$6.07 to \$14.44 per square foot of gross building area. The Board finds the board of review comparable #1 is the best comparable in the record as it is the only comparable relatively similar to the subject in age, building size, location, and some features and has an improvement assessment of \$83,398 or \$10.97 per square foot of gross building area. Nonetheless, the subject's improvement assessment of \$79,500 or \$10.86 per square foot of gross building area falls within the range of all the comparables in the record and below the improvement assessment of the one best comparable in the record. 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.

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 the 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.

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.

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Chairman



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Member



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Member



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Member



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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: July 15, 2025



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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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