



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

APPELLANT: Yue Sheng Liang
DOCKET NO.: 21-49502.001-R-1
PARCEL NO.: 13-03-225-026-0000

The parties of record before the Property Tax Appeal Board are Yue Sheng Liang, the appellant(s), by attorney Paul K. Lee, of The Law Office of Paul K. Lee 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 **A Reduction** 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: \$14,083
IMPR.: \$49,917
TOTAL: \$64,000

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 5,633 square foot parcel of land improved with an approximately four-year-old, two-story, frame and masonry, single-family dwelling. The property is located in Chicago, Jefferson Township, Cook County and is classified as a class 2-78 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 an appraisal which estimated the subject's market value as of January 1, 2021, of \$640,000. The appraiser inspected the subject on May 3, 2022. The appraiser utilized the sales comparison approach to value to estimate the subject's market value. The appraiser opined the highest and best use of the property as improved is its current residential single-family home use. The appraisal discloses within the sales comparison approach that the appraiser conducted a condensed appraisal.

Under the sales comparison approach, the appraiser analyzed four sales in arriving at the estimate of value. The sales properties are described as two or three-story, masonry, single-family dwellings with three or four above-grade bedrooms and three and one-half baths. They sold from February 2019 to July 2020 for prices ranging from \$622,500 to \$800,000 or from \$185.63 to \$233.67 per square foot of building area. The appraisal does not note any of the adjustments made and discloses "[b]racketed sale deeds were pulled and retained in our files as well as further details on ranking, quantitative or qualitative adjustments." The appraisal noted that comparable #1 at \$186.25 per square foot of living area was inferior to the subject and that the subject should fall between comparables #2, \$233.67 per square foot of living area, and #4, \$192.86 per square foot of living area. After making adjustments for pertinent factors, the appraiser opined a price per square foot for the subject of \$210.00 per square foot of living area or \$640,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's assessment of \$88,351 which reflects a market value of \$883,510 using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of the current assessment, the board of review submitted four sales comparables. These properties are described as two-story, frame, single-family dwellings. In range in age from three to seven years and in size from 2,643 to 3,048 square feet of living area. They sold from June to December 2021 for prices ranging from \$374.73 to \$484.30 per square foot of building area with one listed as selling for \$1.00.

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 best evidence of market value to be the appraisal submitted by the appellant. The appellant's appraiser utilized the sales comparison approach to value in determining the subject's market value. The current assessment reflects a market value above this value. The Board finds this appraisal to be persuasive because the appraisal discloses that the appraiser inspected the subject, reviewed the property's history, and used similar properties in the sales comparison approach. Therefore, the Board finds the subject property's market value of \$640,000 as of the assessment date at issue. Since market value has been established the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10% shall apply.

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: _____

July 21, 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 9-125 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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