



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

APPELLANT: Qing Ru
DOCKET NO.: 22-24210.001-R-1
PARCEL NO.: 05-21-403-005-0000

The parties of record before the Property Tax Appeal Board are Qing Ru, the appellant, by Noah J. Schmidt, attorney-at-law 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 **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: \$36,248
IMPR.: \$82,087
TOTAL: \$118,335

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 2022 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 is improved with a two-story dwelling of frame and masonry exterior construction that contains 3,818 square feet of living area. The dwelling is approximately 73 years old. Features of the home include a partial basement with a formal recreation room, central air conditioning, two fireplaces, and 2½ bathrooms. The property has a 12,946 square foot site located in Winnetka, New Trier Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-06 properties improved with two-story dwellings of stucco, masonry or frame and masonry exterior construction that range in size from 3,460 to 4,150 square feet of living area. The homes range in age from 71 to 122 years old. Each comparable

has a full basement with three having finished area, a 2-car garage, and 1, 2 or 3 fireplaces. The comparables have 2½, 3, 3½ or 5½ bathrooms. Four comparables have central air condition. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$73,864 to \$84,524 or from \$20.37 to \$21.85 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$81,514.

The appellant submitted a copy of the board of review final decision disclosing the subject property had a total assessment of \$153,461. The appellant indicated the subject had an improvement assessment of \$117,213 or \$30.70 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the incorrect total assessment for the subject property. In support of its contention of the correct assessment the board of review submitted information on four equity comparables composed of class 2-06 properties improved with two-story dwellings of stucco, masonry or frame and masonry exterior construction. The homes range in age from 69 to 110 years old. Each comparable has a partial or full basement with two having finished area, 3½ or 4½ bathrooms, a 1.5-car or 2-car garage, and 1, 2 or 3 fireplaces. Three comparables have central air conditioning. The comparables have different assessment neighborhood codes than the subject and are described as being located in the same block, ¼ of a mile from the subject or in "subarea." Their improvement assessments range from \$94,950 to \$284,520 or from \$25.20 to \$73.58 per square foot of living area. The board of review indicated the building assessed value per square foot for the comparables average of \$42.36 is higher than the subject, which supports the 2022 assessed value as equitable.

Conclusion of Law

The appellant 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of assessment equity to be the appellant's comparables that are more similar to the subject in location than are the comparables submitted by the board of review. Appellant's comparables # 1, #2 and #4 are significantly older than the subject dwelling indicating upward adjustments to these comparables for age would be appropriate. The appellant's comparables have varying degrees of similarity to the subject in features indicating adjustments would be appropriate to make them more equivalent to the subject property. The appellant's comparables have improvement assessments that range from \$73,864 to \$84,524 or from \$20.37 to \$21.85 per square foot of living area. The subject's improvement assessment of \$117,213 or \$30.70 per square foot of living area falls above the range established by the best comparables in this record. Less weight is given to the board of review comparables due to differences from the subject in location. Additionally, the Board finds the improvement

assessment for board of review comparable #1 is an outlier that is approximately 107% higher on a per square foot of living area basis than the next highest comparable. Based on this record the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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: _____

October 21, 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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