



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

APPELLANT: Andrew Cheng
DOCKET NO.: 22-27346.001-R-1
PARCEL NO.: 05-32-400-097-0000

The parties of record before the Property Tax Appeal Board are Andrew Cheng, the appellant(s), by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; 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: \$14,700
IMPR.: \$20,800
TOTAL: \$35,500

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 consists of a split-level single-family dwelling of frame and masonry construction with 1,278 square feet of living area. The dwelling was 61 years old. Features of the home include a partial basement and central air conditioning. The property has an 8,400 square foot site and is located in Wilmette, New Trier Township, Cook County. The property is a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity as the basis of the appeal. In support of the argument of overvaluation the appellant submitted an appraisal estimating the subject property had a market value of \$355,000 as of April 5, 2021. The appraisal was prepared by a certified residential real estate appraiser who conducted an inspection of the property on April 5, 2021, and who asserted that the highest and best use of the property as improved is its

present use. The appraiser used the sales comparison and cost approaches to valuation of the subject property.

Under the sales comparison approach, the appraiser utilized six comparable sales properties located within a 0.93-mile radius of the subject property. The comparable properties sites ranged in size from 5,280 to 9,249 square feet of land area and, according to the appraisal grids, from 1,102 to 1,639 square feet of living area. The properties are each improved with a split-level single-family dwelling of masonry or frame and masonry construction that were from 58 to 64 years old. The comparable properties sold from May 2020 to March 2021 for prices ranging from \$345,000 to \$394,000 or from \$232.46 to \$321.40 per square foot of living area, land included in the sales prices. The appraiser adjusted, as applicable, for condition, gross living area, room count, garage, lot size, amenities, and sales concessions. The appraiser concluded that based on the sales data and applying adjustments to the comparable sales for differences from the subject, the subject had a market value of \$355,000 or \$277.78 per square foot of living area, land included.

Under the cost approach the appraiser the appraiser used the Marshall and Swift source of cost data to estimate the new replacement cost for the improvement. The appraiser considered the cost of the site, dwelling, basement, garage, and depreciation to arrive at an estimated value by cost approach of \$361,899.

In reconciling the approaches to valuation, the appraiser relied on the sales comparison approach and asserted that this approach "best displays typical buyers/seller attitudes in the marketplace." Based on this evidence the appellant is seeking a reduction in the subject's assessment to reflect the appraised value.

In addition, in support of the argument of overvaluation the appellant submitted information on four class 2-34 comparable sales properties which are located in the same neighborhood code as the subject, including one within a ¼-mile of the subject and two within the same subarea as the subject. The properties sold from August 2021 to May 2022 for sales prices from \$360,500 to \$458,000 or from \$275.26 to \$341.79 per square foot of living area, land included in the sales prices. The properties were from 61 to 65 years old and had from 1,227 to 1,340 square feet of living area. Based on this evidence the appellant is seeking a reduction in the subject's assessment.

In support of the argument of assessment inequity the appellant submitted information on eight class 2-34 equity comparable properties with varying degrees of similarities to the subject which are located within the same neighborhood code as the subject, including two within a ¼-mile of the subject and six within the same subarea as the subject. The improvements ranged: in age from 59 to 66 years; in size from 1,210 to 1,340 square feet of living area; and in improvement assessment from \$14.88 to \$19.76 per square foot of living area. Appellant disclosed that this is not an owner-occupied residence. Based on this evidence the appellant is seeking a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$46,000. The subject's assessment reflects a market value of \$460,000 or \$359.94 per square foot of living area, including land, when applying the level of

assessments for class two property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment based on market value the board of review submitted information on four comparable sales properties which sold from January 2021 to June 2022 for sales prices from \$475,000 to \$830,000 or from \$314.78 to \$621.72 per square foot of living area, land included in the sales prices. These properties were located within the same subarea as the subject, including two within a ¼-mile of the subject and one on the same block as the subject. The improvements were from 61 to 66 years old and had from 1,277 to 1,509 square feet of living area.

In support of its contention of the correct assessment based on assessment equity the board of review offered the same four properties as listed above for market value. These properties had improvement assessments from \$25.29 to \$50.50 per square foot of living area. Based on this evidence the board of review requested confirmation of the subject's assessment.

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

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appellant submitted a credible appraisal report with reasonable and logical adjustments for differences from the subject which was not challenged by the board of review. The Board does find that due to differences found in the in the appraisal for the square footage of living area of comparables #4 and #6, the Board gives those two comparables less weight. However, this does not alter the finding by the Board that the appraisal by the appellant remains the best evidence of market value based on the four remaining comparables. The four comparable sales presented by the board of review lacked adjustments for significant differences when compared to the subject property. The subject's current assessment reflects a market value of \$460,000, which is higher than the appraised value of \$355,000. Based on the evidence presented, the Board finds the subject property is overvalued and a reduction commensurate with the appellant's request is warranted. Since market value has been established at \$355,000, the level of assessment for class two property under the Cook County Real Property Assessment Classification Ordinance shall apply and the total assessment for the subject property for the lien year in question will be reduced to \$35,500. (86 Ill.Admin.Code §1910.50(c)(2)). After this reduction, the Board finds the subject is equitably assessed.

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: _____

September 15, 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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