



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

APPELLANT: Kyu Chang
DOCKET NO.: 22-47298.001-R-1
PARCEL NO.: 10-07-316-014-0000

The parties of record before the Property Tax Appeal Board are Kyu Chang, 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: \$38,412
IMPR.: \$81,588
TOTAL: \$120,000

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 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 two-story dwelling with 3,943 square feet of living area of frame construction. The dwelling was 10 years old. Features of the home include a full basement, central air conditioning, two fireplaces, and a three-car garage. The property has a 34,920 square foot site and is located in Glenview, Niles Township, Cook County. The subject is classified as a class 2-08 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 \$1,200,000 as of January 1, 2022. The appraisal was prepared by a certified appraiser who conducted an inspection of the property on November 23, 2022. The appraiser asserted that the highest and best use of the property as improved is its

current use. The appraiser used the sales comparison approach to valuation of the property. The appellant disclosed that this is an owner-occupied residence.

Under the sales comparison approach, the appraiser utilized three comparable sales located within a 0.52-mile radius of the subject. The comparable properties sites ranged in size from 9,300 to 10,012 square feet of land area and from 3,671 to 4,307 square feet of living area. The properties are each improved with a two-story, single-family dwelling of frame, masonry, or frame and masonry construction which were from 9 to 24 years old. The comparable properties sold from July 2020 to June 2021 for prices ranging from \$1,180,000 to \$1,275,000 or from \$277.46 to \$321.44 per square foot of living area, land included in the sales prices. The appraiser adjusted, if applicable, for site, room count, gross living area, deck, age, and garage. The appraiser then 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 \$1,200,000. Based on this evidence the appellant is seeking a reduction in the subject's assessment to reflect the appraisal.

In support of the argument of assessment inequity the appellant submitted information on four equity comparable properties with varying degrees of similarities to the subject which are located within a 3.65-mile radius of the subject. The improvements ranged: in age from 29 to 56 years; in size from 3,810 to 4,256 square feet of living area; and in improvement assessment from \$15.21 to \$21.99 per square foot of living area. 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 \$149,407. The subject's assessment reflects a market value of \$1,494,070 or \$378.92 per square foot of living area, including land, when applying the level of assessment for class two property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on two comparable sales properties which sold in July 2021 and August 2022 for sales prices of \$1,315,000 and \$1,699,000 or for \$340.59 and \$410.39 per square foot of living area, land included in the sales prices. These properties were located in the same subarea as the subject, were one and 17 years old, and had 3,861 and 4,140 square feet of living area.

In further support of its contention of the correct assessment, the board of review submitted information on four equity comparable properties, including those listed above in the comparable sales properties argument. These properties are located in the same subarea as the subject, are from one to 17 years old, have from 3,861 to 4,372 square feet of living area, and have improvement assessments from \$28.25 to \$39.75 per square foot of living area. Based on this evidence the board of review requested confirmation of the subject's assessment.

The appellant submitted written rebuttal asserting that the comparable sales properties evidence of the board of review should be given no weight as it represents unadjusted sales. The appellant further asserts that the properties offered by the board of review are superior, and therefore not similar properties, to the subject. The appellant argues that the evidence of the board of review is insufficient to overcome the evidence presented by the appellant.

Conclusion of Law

The appellant contends, in part, that 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. The two comparable sales properties 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 \$1,494,070, which is higher than the appraised value of \$1,200,000. 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 \$1,200,000 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 at issue will be reduced to \$120,000. (86 Ill.Admin.Code §1910.50(c)(2)). After this reduction the Board finds that the subject property 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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