



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

APPELLANT: Seichi Shiraiwa Revocable Trust
DOCKET NO.: 22-48243.001-R-1
PARCEL NO.: 20-14-202-027-0000

The parties of record before the Property Tax Appeal Board are Seichi Shiraiwa Revocable Trust, 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 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: \$21,820
IMPR.: \$63,000
TOTAL: \$84,820

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 2-story apartment building of masonry construction with 3,214 square feet of gross building area which is approximately 129 years old. The building features two full bathrooms and a full basement finished with a recreation room. The property has a 4,364 square foot site and is located in Chicago, Hyde Park, Cook County. The subject is classified as a class 2-11 property¹ 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 located within the same assessment neighborhood code as the subject property. The comparables consist of 2-story, class 2-11 apartment buildings of masonry or frame and masonry

¹ Apartment building with 2 to 6 units, any age.

construction ranging in size from 3,072 to 3,415 square feet of gross building area and ranging in age from approximately 115 to 135 years old. The comparables are described as each having two or three bathrooms and a full basement, four of which are finished with a recreation room. Two comparables have one or two fireplaces, and two comparables have a 1-car or a 2-car garage. The comparables have improvement assessments that range from \$51,915 to \$82,375 or from \$15.20 to \$25.16 per square foot of gross building area. Based on this evidence, the appellant requested a reduction to the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$97,413. The subject property has an improvement assessment of \$75,593 or \$23.52 per square foot of gross building area. In support of its contention of the correct assessment, the board of review submitted information on four equity comparables three of which are located within ¼ of a mile from the subject and all are within the same assessment neighborhood code as the subject property. The comparables consist of 2-story or 3-story, class 2-11 apartment buildings of frame or masonry construction ranging in size from 2,520 to 3,744 square feet of gross building area and ranging in age from 56 to 130 years old. Each comparable features from two to six full bathrooms and a full basement, two of which are finished with a recreation room. One comparable has a fireplace, and three comparables have a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$62,500 to \$88,060 or from \$23.52 to \$25.16 per square foot of gross building area.

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

The parties submitted a total of nine equity comparables in support of their positions before the Property Tax Appeal Board. The Board gave less weight to appellant's comparables #2 and #5, along with board of review comparables #1, #2, and #3 due to each of these comparables having a garage which is not a feature of the subject property. The Board also gave less weight to board of review comparable #4 based on its significantly larger gross building area, newer age, and higher bathroom count relative to the subject. The Board finds the best evidence of equity in assessment to be appellant's comparables #1, #3, and #4 which are most similar to the subject in location, age, gross building area, and bathroom count. However, appellant's comparable #3 lacks a finished basement area, dissimilar to the subject's finished basement, meaning that some upward adjustment is needed to this comparable in order to make it more equivalent to the subject. The best comparables in the record have improvement assessments ranging from \$51,915 to \$63,700 or from \$15.20 to \$20.51 per square foot of gross building area. The subject's improvement assessment of \$75,593 or \$23.52 per square foot of gross building area is above the range established by the most similar comparables in the record both in terms of overall improvement assessment and on a per square foot of gross building area basis.

After considering adjustments to the best comparables for any differences from the subject, the Board finds the subject's improvement is inequitably assessed and, therefore, a reduction in the subject's improvement assessment is warranted.

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

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 15, 2025

Clerk of the Property Tax Appeal Board

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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