



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

APPELLANT: Spencer Yang  
DOCKET NO.: 22-51995.001-R-1  
PARCEL NO.: 17-28-318-041-0000

The parties of record before the Property Tax Appeal Board are Spencer Yang, the appellant, by attorney Thomas E. Sweeney of Siegel Jennings Co., LPA 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 **no change** 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:** \$12,650  
**IMPR.:** \$38,350  
**TOTAL:** \$51,000

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 three-story multi-family building of masonry exterior construction with 4,068 square feet of gross building area. The building is approximately 144 years old. Features of the building include a full unfinished basement and three full bathrooms. The property has a 2,875 square foot site and is located in Chicago, South Chicago Township, Cook County. The subject is classified as a class 2-11 property 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 six equity comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are located within .8 of a mile from the subject, three of which are located along the same street as the subject property. The comparables are improved with

two-story or three-story multi-family buildings of masonry or frame exterior construction ranging in size from 3,594 to 4,497 square feet of gross building area. The buildings are from 97 to 134 years old. One building has a crawl space foundation and five buildings each have a full basement. No data was provided by the appellant concerning basement finish, if any, of the comparables. Each building has three or four full bathrooms and three comparables each have a two-car garage. The comparables have improvement assessments that range from \$24,371 to \$31,929 or from \$6.78 to \$7.61 per square foot of gross building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$28,761 or \$7.07 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$51,000. The subject property has an improvement assessment of \$38,350 or \$9.43 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 that have the same assessment neighborhood code and property classification code as the subject. The comparables are located approximately ¼ of a mile from the subject property. The comparables are improved with three-story multi-family buildings of masonry or frame exterior construction ranging in size from 3,513 to 4,212 square feet of gross building area. The buildings are from 123 to 142 years old. The comparables each have a full basement, two of which are finished with either an apartment or a formal recreation room. Each building has three of six full bathrooms, three buildings each have three additional half bathrooms, one building has central air conditioning and three comparables each have a two-car garage. The comparables have improvement assessments that range from \$35,140 to \$65,700 or from \$9.63 to \$16.85 per square foot of gross building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted ten comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables #1, #2, #3, #5 and #6, as well as board of review comparables #1, #2 and #3, due to their dissimilar two-story design, when compared to the subject's three-story design and/or they have a garage, unlike the subject. Additionally, the appellant's comparable #1 and board of review comparables #1, #2 and #3 differ from the subject building in size and/or they have central air conditioning, unlike the subject, and the appellant's comparable #5 is considerably newer in age, when compared to the subject dwelling.

The Board finds the best evidence of assessment equity to be the appellant's comparable #4 and board of review comparable #4, which are three-story buildings, like the subject and are overall more similar to the subject in location, building size and age. However, the appellant's comparable #4 lacks a basement foundation, a feature of the subject, suggesting an upward adjustment would be required to make the comparable more equivalent to the subject. Likewise, board of review comparable #4 has a superior number of bathrooms, when compared to the subject, suggesting a downward adjustment for this difference would be necessary. Nevertheless, these two comparables have improvement assessments of \$31,350 and \$40,580 or \$7.20 and \$9.63 per square foot of gross building area. The subject's improvement assessment of \$38,350 or \$9.43 per square foot of gross building area is bracketed by the two best comparables in the record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not 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: June 17, 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

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