



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

APPELLANT: Jiazhao Chen  
DOCKET NO.: 22-59369.001-R-1  
PARCEL NO.: 17-28-209-040-0000

The parties of record before the Property Tax Appeal Board are Jiazhao Chen, 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:** \$11,000  
**IMPR.:** \$22,780  
**TOTAL:** \$33,780

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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 multi-family building of masonry exterior construction with 1,650 square feet of gross building area that is approximately 133 years old. Features of the home include a basement, 2 bathrooms, and a 1-car garage. The property has a 2,500 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's appeal is based on overvaluation and assessment inequity with respect to the improvement as the bases of the appeal. In support of the market value argument, the appellant submitted evidence disclosing the subject property was purchased by the appellant on December 10, 2020 for a price of \$337,800 from June F. Leung. The appellant completed

Section IV - Recent Sale Data of the appeal petition disclosing the parties to the transaction were not related, the property was sold by a realtor and the property was advertised for sale through the Multiple Listing Service (MLS) although neither the name of the agent nor the length of time on the market were provided. The appellant also disclosed that the property was not sold due to a foreclosure or using a contract for deed. In further support, the appellant submitted copies of the real estate contract and the Settlement Statement which did not depict the distribution of commissions, but did reiterate the seller's name, the sale price and date of sale.

In support of the assessment inequity argument, the appellant submitted information, including property characteristics printouts, on five equity comparables that are located within the same assessment neighborhood as the subject. In the grid analysis, the appellant reported "unknown" for the comparables' proximity to the subject property. The comparables consist of class 2-11, 2-story multi-family buildings of frame exterior construction ranging in size from 1,600 to 1,806 square feet of gross building area. The buildings are each 130 years old. Each building has a basement and 2 bathrooms. The comparables have improvement assessments ranging from \$11,994 to \$16,334 or from \$7.20 to \$10.21 per square foot of gross building area.

Based on the evidence, the appellant requested the subject's total assessment be reduced to \$23,639 and the improvement assessment be reduced to \$12,639 or \$7.66 per square foot of gross building area. The requested total assessment reflects a total market value of \$236,390 or \$143.27 per square foot of building area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$57,000. The subject's assessment reflects a market value of \$570,000 or \$345.45 per square foot of gross building area, land included, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The subject property has an improvement assessment of \$46,000 or \$27.88 per square foot of gross building area.

In support of its contention of the correct assessment, the board of review submitted information on three comparables with both sales and equity data that are located in the same assessment neighborhood as the subject and within the subject's block or approximately ¼ of a mile from the subject property. The comparables consist of class 2-11, 2-story multi-family buildings of masonry exterior construction ranging in size from 2,173 to 2,459 square feet of gross building area. The buildings are from 66 to 137 years old. Each comparable has a basement and 2 or 3 bathrooms. Comparable #3 has a 1-car garage. The comparables have 2,500 or 3,125 square foot sites and sold from April to November of 2022 for prices ranging from \$470,000 to \$565,500 or from \$191.13 to \$260.24 per square foot of gross building area, land included. The comparables have improvement assessments ranging from \$39,032 to \$58,000 or from \$17.21 to \$23.59 per square foot of gross building area.

### **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 on the basis of overvaluation.

The appellant submitted evidence of an arm's length sale of the subject property and the board of review submitted three comparable sales for the Board's consideration. The Board finds the best evidence of the market value in the record to be the purchase of the subject property on December 10, 2020 for a price of \$337,800. The appellant demonstrated the subject's sale had elements of an arms-length transaction. The evidence disclosed the seller as June F. Leung and the appellant's appeal petition indicated the parties to the transaction were not related, the property was sold using a realtor, and the property was advertised for sale through the MLS. The Board finds the subject's purchase price of \$337,800 falls below the market value, as reflected by the subject's assessment, of \$570,000. The Board finds the board of review did not present any substantive documentary evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value.

Alternatively, the taxpayer contends assessment inequity as a 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 no further reduction based on assessment inequity is warranted.

The parties provided a total seven equity comparables for the Board's consideration. The Board has given less weight to the appellant's comparable #1 and the board of review's comparable #1 due to differences in their site size or age when compared to the subject. The Board gives more weight to the parties' remaining comparables which are located within the subject's assessment neighborhood and are relatively similar to the subject in site size, age, foundation type, and bathroom count. However, these comparables still require adjustments for differences to the subject in features, including six comparables lack of a garage and the two board of review's comparables larger building sizes. The six comparables have improvement assessments ranging from \$11,994 to \$46,250 or from \$7.20 to \$21.28 per square foot of gross building area. Having determined that the subject's assessment should be reduced to reflect its purchase price of \$337,800, the Board finds no further reduction in the subject's revised improvement assessment of \$22,780 or \$13.81 per square foot of gross building area 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

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:

May 19, 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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