



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

APPELLANT: Tong-Chuan He  
DOCKET NO.: 23-40286.001-R-1  
PARCEL NO.: 20-14-211-046-0000

The parties of record before the Property Tax Appeal Board are Tong-Chuan He, 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 **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:** \$9,010  
**IMPR.:** \$48,990  
**TOTAL:** \$58,000

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 2023 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 townhome or row house of masonry exterior construction with 1,676 square feet of living area. The dwelling is approximately 62 years old. The dwelling features a full basement with finished area, central air conditioning, and 1½ bathrooms. The property has an 1,802 square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-10 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 five equity comparables that have the same assessment neighborhood code as the subject. The comparables are class 2-95 properties that are improved with two-story townhomes or row houses of masonry or frame and masonry exterior construction ranging in size from 1,594 to 1,775 square feet of

living area. The dwellings are from 32 to 58 years old. The comparables each have a full basement with finished area. Four comparables have central air conditioning, three comparables each have a fireplace and comparable #4 has a 2-car garage. The comparables have improvement assessments that range from \$26,286 to \$29,175 or from \$16.01 to \$16.52 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$27,201 or \$16.23 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$58,000. The subject property has an improvement assessment of \$48,990 or \$29.23 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted five comparable grids with information on 24 equity comparables that have the same assessment neighborhood code as the subject property.<sup>1</sup> The comparables are located within the same block as the subject, approximately ¼ of a mile from the subject or within the subject's subarea, four of which are also along the same street as the subject property. The comparables are class 2-10 or 2-95 properties that are improved with two-story townhomes or row houses of masonry exterior construction ranging in size from 1,648 to 1,996 square feet of living area. The dwellings are from 59 to 133 years old. The comparables each have a full basement, 20 of which have finished area. Each comparable has 1½, 2 or 2½ bathrooms, with one comparable having an additional half bathroom. Four comparables each have a fireplace and 21 comparables have central air conditioning. The comparables have improvement assessments ranging from \$48,990 to \$61,000 or from \$29.23 to \$31.44 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 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 29 comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables #3, #4 and #5 which are less similar the subject in dwelling size and/or age than other comparables in the record. In addition, the appellant's comparable #3 lacks central air conditioning, unlike the subject. The Board has given reduced weight to board of review comparables #11, #18 and #21 though #24 due to their lack of central air conditioning and/or basement finish, both features of the subject. Additionally, board of review comparables #23 and #24 are significantly older than the subject. The Board has also

---

<sup>1</sup> The comparables depicted in grids two through six have been renumbered as comparables #5 through #24, for ease of reference.

given reduced weight to board of review comparables #17, #18, #19 and #20 due to their larger dwelling sizes when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1 and #2, along with board of review comparables #1 through #10 and #12 through #16, which are similar to the subject in location and similar, if not identical, to the subject in dwelling size, design, age and some features. These 17 comparables have improvement assessments ranging from \$26,520 to \$50,630 or from \$16.01 to \$30.21 per square foot of living area. The subject's improvement assessment of \$48,990 or \$29.23 per square foot of living area falls within the range established by the best comparables in the record and appears to be well supported. After considering adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill.2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which appears to exist on the basis of the evidence presented.

Based on this record, the Board finds 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 16, 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Tong-Chuan He, by attorney:  
Michael R. O'Malley  
Schmidt Salzman & Moran, Ltd.  
111 West Washington St.  
Suite 1300  
Chicago, IL 60602

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602