FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jacob Tran
DOCKET NO.: 23-40692.001-R-1
PARCEL NO.: 03-25-213-018-0000

The parties of record before the Property Tax Appeal Board are Jacob Tran, 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:	$7,944
IMPR.:	$29,556
TOTAL:	$37,500

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 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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 dwelling of frame and masonry construction with 2,300[1] square feet of living area. The dwelling was approximately 40 years old. Features of the home include a full basement, central air conditioning, a fireplace and a two-car garage. The property has a 9,930 square foot site and is located in Mount Prospect, Wheeling Township, Cook County. The property is a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation 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 $375,000 as of November 30, 2020. The appraisal was prepared by a certified general

[1] The Board finds that the subject property improvement has 2,300 square feet of living area based on the inspection by the appraiser.

real estate appraiser who conducted an inspection of the property. The appraiser asserted that the highest and best use of the property is its current use. The appraiser used the sales comparison and cost approaches to valuation.

Under the sales comparison approach, the appraiser utilized six comparable sales located within 0.65-mile radius of the subject property. The comparable properties sites ranged in size from 9,100 to 11,741 square feet of land area and from 2,118 to 2,663 square feet of living area. The properties are each improved with a two-story single-family dwelling of frame and masonry construction that were from 51 to 57 years old. The comparable properties sold from August 2020 to November 2020 for prices ranging from $339,900 to $490,000 or from $131.49 to $231.35 per square foot of living area, land included in the sales prices. The appraiser adjusted for age, room count, gross living area, rooms below grade, amenities, and sales concessions. The appraiser 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 $375,000 or $163.04 per square foot of living area, land included.

Under the cost approach the appraiser the appraiser used the Marshall and Swift source of cost data to estimate the new replacement cost for the improvement. The appraiser considered the cost of the site, improvement, basement, garage, and depreciation to arrive at an estimated value by cost approach of $407,200.

In reconciling the approaches to valuation, the appraiser relied on the sales comparison approach and asserted that this approach "best reflects the attitudes of buyers and sellers in today's marketplace for one-to-four-unit properties." Based on this evidence the appellant is seeking a reduction in the subject's assessment to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $42,154. The subject's assessment reflects a market value of $421,540 or $183.28 per square foot of living area, including land, based on 2,300 square feet of living area, when applying the level of assessments for class 2 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 four comparable sales properties which sold from October 2021 to June 2023 for sales prices from $300,000 to $665,000 or from $124.07 to $235.89 per square foot of living area. These properties were located within a ¼-mile radius of the subject. The improvements were from 18 to 41 years old and had from 2,268 to 2,985 square feet of living area. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends overvaluation in the assessment process but the subject property was the subject of a previous PTAB decision.

The Property Tax Appeal Board finds that the assessment as established by the Board for the 2022 tax year should be carried forward to the tax year at issue subject only to equalization as provided by section 16-185 of the Property Tax Code.

Section 16-185 of the Property Tax Code provides, in relevant part:

> If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review.
> 35 ILCS 200/16 -185

Additionally, "Standard of proof. Unless otherwise provided by law or stated in the agency's rules, the standard of proof in any contested case hearing conducted under this Act by an agency shall be the preponderance of the evidence." 5 ILCS 100/10 15. The Board takes official notice that it rendered a decision lowering the subject's assessment for tax year 2022 (86 Ill.Admin.Code §1910.90(i)), and that tax year 2022 and the instant tax year of 2023 are in the same general assessment period for Wheeling Township. The Board further finds that the subject is owner occupied based on the appellant's response to Section 1b of the residential appeal form, which states that the subject is owner occupied. The record contains no evidence indicating that the subject sold in an arm's length transaction subsequent to the Board's decision for the 2022 tax year, or that the Board's decision for the 2022 tax year was reversed or modified upon review. For these reasons, the Board finds by a preponderance of the evidence that the subject's assessment should be carried forward to the 2023 tax year, pursuant to section 16-185 of the Property Tax Code, to reflect the Board's decision for the 2022 tax year, plus the application of an equalization factor, if any.

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:

C E R T I F I C A T I O N

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 21, 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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