FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jordan Ho
DOCKET NO.: 24-42348.001-R-1
PARCEL NO.: 13-26-407-014-0000

The parties of record before the Property Tax Appeal Board are Jordan Ho, the appellant, by attorney Michael R. O'Malley, 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:	$13,594
IMPR.:	$102,406
TOTAL:	$116,000

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 2024 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 1.5-story dwelling of frame exterior construction with 1,826 square feet of living area.[1] The dwelling is approximately 118 years old. Features of the home include a basement with finished area, 3½ bathrooms, central air conditioning and a 2-car garage. The property has a 3,125 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity concerning 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. The

[1] The descriptive property characteristics of the subject dwelling were gleaned from the board of review's grid analysis, which was unrefuted by the appellant.

appellant's grid analysis reported the comparables' proximity to the subject property was "unknown." The comparables are improved with class 2-04, 1-story or 1.5-story dwellings of frame or frame and masonry exterior construction ranging in size from 1,810 to 1,931 square feet of living area. The dwellings are from 99 to 116 years old. Each comparable has a basement, with four having finished area, 1 or 2 bathrooms, and either a 1-car or a 2-car garage. One comparable has central air conditioning. The comparables have improvement assessments ranging from $26,004 to $34,151 or from $13.98 to $17.96 per square foot of living area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment to $32,101 or $17.58 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 $116,000. The subject property has an improvement assessment of $102,406 or $56.08 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on three equity comparables. Comparable #2 is located within the subject's assessment neighborhood code and within approximately ¼ of a mile from the subject. The comparables are improved with class 2-03, 1-story or 1.5-story or class 2-05, 2-story dwellings of masonry or stucco exterior construction ranging in size from 1,080 to 1,902 square feet of living area. The dwellings are from 102 to 132 years old. Each comparable has a basement, with two having finished area, 3 to 5½ bathrooms, central air conditioning, and either a 1.5-car or a 2-car garage. One comparable has a fireplace. The comparables have improvement assessments ranging from $68,688 to $128,688 or from $60.78 to $67.66 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 record contains a total of eight equity comparables for the Board's consideration, which have varying degrees of similarity to the subject in location, class/design, dwelling size and other features. Nevertheless, the Board gives less weight to the appellant's comparables #1, #2, #4 and #5 due to a lack of basement finish and/or central air conditioning when compared to the subject. The Board also gives less weight to the board of review's comparables #1 and #3 due to their different assessment neighborhood codes, smaller dwelling size, and/or lack of basement finish when compared to the subject.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables which are located within the subject's assessment neighborhood and are relatively similar to the subject in dwelling size, age, basement finish and most features. However, these comparables still require adjustments for varying degrees of similarity to the subject, such as their

smaller/larger bathroom counts to make them more equivalent to the subject. These two comparables have improvement assessments of $31,813 and $128,688 or $17.58 and $67.66 per square foot of living area, respectively. The subject's improvement assessment of $102,406 or $56.08 per square foot of living area is bracketed by the two best comparables in this record. After considering adjustments to the two 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 and a reduction in the subject's assessment is not justified.

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 the 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.

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: October 20, 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 9-215 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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