



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

APPELLANT: 6728 Sassy Capital, LLC  
DOCKET NO.: 17-39543.001-R-1  
PARCEL NO.: 20-21-402-021-0000

The parties of record before the Property Tax Appeal Board are 6728 Sassy Capital, LLC, the appellant, by attorney Gregory P. Diamantopoulos of Verros Berkshire, PC 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:** \$5,040  
**IMPR.:** \$23,481  
**TOTAL:** \$28,521

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 2017 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 dwelling of masonry exterior construction with 9,099 square feet of living area. The dwelling is approximately 108 years old and features a full unfinished basement. The property has an 8,400 square foot site and is located in Chicago, Lake 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 overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on five comparable sales located within the subject's neighborhood code and from .4 to .8 of a mile from the subject property. The comparables have sites that range in size from 3,125 to 6,249 square feet of land area. The comparables are improved with similar class 2-11 three-story multi-family dwellings of masonry exterior construction ranging in size from 5,938 to 7,980 square feet of living area. The dwellings range

in age from 102 to 119 years old. Each comparable has a full basement with one finished as an apartment, one comparable has central air conditioning and one comparable has a two-car garage. The properties sold from August 2014 to November 2016 for prices ranging from \$70,000 to \$150,000 or from \$8.77 to \$20.75 per square foot of living area, including land. Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$18,464. The requested assessment would reflect a total market value of \$184,640 or \$20.29 per square foot of living 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 \$28,521. The subject's assessment reflects a market value of \$285,210 or \$31.35 per square foot of living area, including land, when applying the level of assessment 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, one of which is located within the same neighborhood code as the subject property. The comparables have sites that range in size from 5,764 to 7,500 square feet of land area. The comparables are improved with similar class 2-11 three-story multi-family dwellings of masonry exterior construction ranging in size from 7,782 to 9,942 square feet of living area. The dwellings range in age from 99 to 127 years old. Each comparable has a full unfinished basement and two comparables have either a two-car or a four-car garage. The properties sold from April 2016 to May 2017 for prices ranging from \$295,000 to \$580,000 or from \$36.71 to \$67.08 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The appellant contends 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 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 nine suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparables #1, #2 and #5 due to their smaller dwelling sizes and/or their sale dates occurred in 2014 which are dated and less likely to reflect the subject's market value as of the January 1, 2017 assessment date. The Board gives reduced weight to board of review comparables #1, #3 and #4 due to their dissimilar neighborhood code from the subject.

The Board finds the best evidence of market value to be appellant's comparable sales #3 and #4, as well as board of review comparable sale #2. These comparables are relatively similar to the subject in location, design and age. However, the Board finds that each comparable has a considerably smaller site size and dwelling size when compared to the subject. These comparables sold from June 2016 to May 2017 for prices ranging from \$75,000 to \$450,000 or

from \$9.89 to \$50.95 per square foot of living area, including land. The subject's assessment reflects a market value of \$285,210 or \$31.35 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. After considering necessary adjustments to the comparables for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its assessment 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: June 8, 2021



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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