



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

APPELLANT: Housing One, LLC
DOCKET NO.: 17-42767.001-R-1
PARCEL NO.: 31-03-203-081-0000

The parties of record before the Property Tax Appeal Board are Housing One, 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 **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: \$1,048
IMPR.: \$3,852
TOTAL: \$4,900

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 two-story townhouse of frame exterior construction containing 1,306 square feet of living area. The dwelling is approximately 40 years old. The home features a concrete slab foundation and a one-car garage. The property has a 1,398 square foot site and is located in Country Club Hills, Rich Township, Cook County. The subject is classified as a class 2-95 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 three grid analyses containing 12 comparable sales located within the same assessment neighborhood code as the subject. For ease of read, the second and third set of comparables were renumbered #5 through #12. The comparables have sites ranging in size from 739 to 2,308 square feet of land area and are improved with class 2-95 one-story or two-story townhouses. The townhouses range in size from 792 to 1,306 square feet of living area and range

in age from 38 to 47 years old. Nine comparables have central air conditioning and eight comparables have one-car garages. The comparables sold from March 2014 to June 2017 for prices ranging from \$18,500 to \$49,500 or from \$15.31 to \$38.73 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$3,524.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$6,078. The subject's assessment reflects a market value of \$60,780 or \$46.54 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 located in a different neighborhood code than the subject. The comparables have sites ranging in size from 1,613 to 1,973 square feet of land area and are improved with class 2-95, one-story and two-story townhouses of frame and masonry exterior construction ranging in size from 1,200 to 2,090 square feet of living area. The dwellings are 41 years old. The comparables have partial or full basements with three having formal recreation rooms. Each comparable has central air conditioning and a two-car garage. Three comparables each have a fireplace. The comparables sold from May 2015 to August 2016 for prices ranging from \$90,000 to \$177,000 or from \$71.77 to \$92.23 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant's counsel noted that each of comparable sales submitted by the board of review are located outside of the subject's neighborhood code.

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 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.

The Board finds 16 comparable sales were submitted by the parties to support their respective positions. The Board gave less weight to the appellant's comparables #1 and #4 through #12 due to differences in story height, dwelling size and/or their sale dates which occurred in 2014 and 2015 were less proximate in time to the January 1, 2017 assessment date and less likely to be reflective of market value. The Board gave less weight to the board of review comparables as they were located in a different assessment neighborhood code, have larger dwelling sizes and/or have a different story height when compared to the subject.

The Board finds the best evidence of the subject's market value to be the appellant's comparables #2 and #3 which sold proximate in time to the assessment date at issue and were identical to the subject property in dwelling size, age and most features. These two comparables

sold in November 2016 and April 2017 for prices of \$49,500 and \$42,000 or for \$37.90 and \$32.54 per square foot of living area, including land. The subject's assessment reflects a market value of \$60,780 or \$46.54 per square foot of living area, including land, which is above the two best comparable sales in this record both on overall price and price per square foot. Based on this evidence, the Board finds the appellant proved by a preponderance of the evidence that the subject's estimate of market value as reflected by the assessment is excessive and a reduction in the subject's assessment is 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: July 20, 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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