



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

APPELLANT: Sunrise One Properties, LLC
DOCKET NO.: 17-42847.001-R-1
PARCEL NO.: 31-03-203-133-0000

The parties of record before the Property Tax Appeal Board are Sunrise One Properties, 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: \$1,068
IMPR.: \$3,503
TOTAL: \$4,571

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 dwelling of frame exterior construction with 1,304 square feet of living area. The dwelling is approximately 38 years old. Features of the home include a concrete slab foundation and a one-car garage. The property has a 1,425 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 a grid analysis and property characteristic sheets of the subject and 12 comparable sales located within the same neighborhood code as the subject and from 134 feet to 1.2 miles from the subject property. The comparables have sites that range in size from 739 to 2,308 square feet of land area. The comparables are improved with one-story or two-story class

2-95 dwellings of frame or frame and masonry exterior construction ranging in size from 792 to 2,308 square feet of living area. The dwellings range in age from 38 to 47 years old. Three comparables have full unfinished basements, nine comparables have concrete slab foundations, nine comparables have central air conditioning and eight comparables each have a one-car garage. The properties 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 that the subject's total assessment be reduced to \$3,519. The requested assessment would reflect a total market value of \$35,190 or \$26.99 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 \$5,632. The subject's assessment reflects a market value of \$56,320 or \$43.19 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 Tinley Park or Hazel Crest, none of which are located within the subject's neighborhood code. The comparables have sites that range in size from 1,820 to 6,569 square feet of land area. The comparables are improved with one-story or two-story class 2-95 dwellings of masonry or frame and masonry exterior construction ranging in size from 1,396 to 1,550 square feet of living area. The dwellings are either 16 or 40 years old. Each comparable has a full unfinished basement, central air conditioning and either a one-car or a two-car garage. Comparable #3 has a fireplace. The properties sold from January to December 2016 for prices ranging from \$119,900 to \$150,000 or from \$78.62 to \$107.45 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, counsel for the appellant argued that the board of review comparables are located outside of the subject's neighborhood code and in the Villages of Hazel Crest and Tinley Park.

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 parties submitted 16 suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparable sales #1 and #4 through #12 which differ from the subject in dwelling size, design, foundation type and/or the sales occurred in 2014 and 2015 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 the

comparable sales submitted by the board of review which differ from the subject in location, lot size, design, age and/or foundation type.

The Board finds the best evidence of market value to be appellant's comparable sales #2 and #3. These comparables are most similar to the subject in dwelling size, design, age and features, except each has central air conditioning, not a feature the subject enjoys. These comparables sold in November 2016 and November 2017 for prices of \$49,500 and \$42,500 or for \$37.90 and \$32.54 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$56,320 or \$43.19 per square foot of living area, including land, which is above the sales prices of the two best comparable sales in the record. After considering necessary adjustments to the comparables for differences when compared to the subject, the Board finds a reduction in the subject's 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: 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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