



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

APPELLANT: Horizon One, LLC
DOCKET NO.: 18-40154.001-R-1
PARCEL NO.: 29-11-425-003-0000

The parties of record before the Property Tax Appeal Board are Horizon 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: \$2,088
IMPR.: \$10,451
TOTAL: \$12,539

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 2018 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 multi-family dwelling of masonry exterior construction with 3,651 square feet of building area. The dwelling is approximately 54 years old and features a concrete slab foundation. The property has a 5,967 square foot site and is located in Dolton, Thornton 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 four comparable sales located within 1.7 miles from the subject property. The comparables have sites that range in size from 6,072 to 8,577 square feet of land area and are improved with class 2-11 multi-family dwellings of masonry exterior construction that range in size from 3,390 to 3,988 square feet of building area. The dwellings range in age from 41 to 47 years old. Each comparable has a basement, one with a finished

apartment. Comparable #2 has a 2-car garage. The comparables sold from January 2017 to June 2018 for prices ranging from \$95,000 to \$150,000 or from \$23.82 to \$44.25 per square foot of building area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$12,539.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$16,692. The subject's assessment reflects a market value of \$166,920 or \$45.72 per square foot of building 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 either Lansing, Burnham or Calumet City. The comparables have sites that range in size from 4,920 to 7,812 square feet of land area and are improved with two-story class 2-11 dwellings of masonry exterior construction that range in size from 2,862 to 4,041 square feet of building area. The dwellings range in age from 39 to 66 years old. Three comparables have basements with one having a finished apartment and one comparable has a concrete slab foundation. Comparable #4 has a 2-car garage. The comparables sold from September 2016 to December 2017 for prices ranging from \$148,000 to \$415,000 or from \$49.39 to \$102.70 per square foot of building area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In rebuttal, the appellant argued that the submitted comparable sales were located in both the subject's assessment neighborhood as well Dolton, the same city as the subject, while the board of review's submitted comparable sales were located outside of the subject's neighborhood code and in the Village of Burnham, the Village of Lansing or the City of Calumet City.

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 eight comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparable #2 which differs from the subject in having a basement apartment and garage compared to the subject's slab foundation and no garage. The Board also gave reduced weight to the board of review comparables which, in addition to other differences, are located in different cities than the subject property.

The Board finds the best evidence of market value to be the appellant's comparables #1, #3 and #4 which are generally similar to the subject in location, age, design, building size and most features. These comparables sold for prices ranging from \$117,500 to \$150,000 or from \$32.36 to \$44.25 per square foot of living area, including land. The subject's assessment reflects a market value of \$166,920 or \$45.72 per square foot of living area, including land, which falls

above the range established by the best comparable sales in this record. After considering adjustments to the comparables for differences with the subject, the Board finds a reduction in the subject's assessment, commensurate with the request 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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