



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

APPELLANT: Robert Holzheimer
DOCKET NO.: 18-44358.001-R-1
PARCEL NO.: 16-14-112-013-0000

The parties of record before the Property Tax Appeal Board are Robert Holzheimer, the appellant(s), by attorney Jessica Hill-Magiera, Attorney at Law in Lake Zurich; 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: \$4,406
IMPR.: \$6,003
TOTAL: \$10,409

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 108-year-old, two-story multi-family dwelling of frame construction with 2,972 square feet of living area. Features of the home include a slab foundation and a one-car garage. The property has a 3,750 square foot site and is located in Chicago, West Chicago 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 the market value argument, the appellant submitted six sales comparables. The comparables are described as two-story, multi-family dwellings. They range in age from 95 to 105 years and in size from 2,670 to 3,002 square feet of building area. The comparables had the same assessment neighborhood code as the subject property and were located within a ½ mile radius of the subject. The sales occurred from July 2017 to September 2018 for prices ranging from \$2.30 to \$36.08 per square foot of

living area, including land.¹ Based on this evidence, the appellant requested a reduction in the subject's total assessment to \$6,598.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's total assessment of \$15,908 which reflects a market value of \$159,080 or \$53.53 per square foot of living area, including land, when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with two-story multi-family dwellings of either masonry construction or frame construction ranging in size from 2,284 to 3,168 square feet of living area. The comparables ranged in age from 105 to 116 years. Each property has either a basement apartment or a full unfinished basement. These properties have sites ranging in size from 3,125 to 3,388 square feet of land area. The comparables had the same assessment neighborhood code as the subject property and two of the comparables were located within a block of the subject. The sales occurred from January 2017 to December 2018 for prices ranging from \$160,000 to \$200,000 or from \$53.66 to \$87.57 per square foot of living area, including land.

In written rebuttal, the appellant argued the strengths and similarities of their comparables over the board of review's comparables while also advocating for the use of a median sales price analysis approach. Additionally, the appellant submitted a grid with side-by-side comparisons of both parties comparables. The appellant reaffirmed the request for an assessment reduction.

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 best evidence of market value to be the appellant's comparables #2, #5 and #6. These three comparables had sales prices ranging from \$24.98 to \$36.08 per square foot of building area, including land. In comparison the subject's assessment reflects a market value of \$53.53 per square foot of building area, including land is above the range of the best comparables in this record. Based on this record the Board finds the appellant demonstrated by a preponderance of the evidence that the subject was overvalued and a reduction in the subject's assessment is justified.

¹ Appellant's comparable #1 has a per square foot sales price of \$2.30 (land included). The board finds that this sales price is not reflective of the fair market value for multi-family dwellings (class 2-11) with the same assessment neighborhood code as the subject property, as such the board did not consider appellant's comparable #1.

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 27, 2023



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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