



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

APPELLANT: ABC Turnkey Prop LLC Series A  
DOCKET NO.: 19-32185.001-R-1  
PARCEL NO.: 29-14-319-003-0000

The parties of record before the Property Tax Appeal Board are ABC Turnkey Prop LLC Series A, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. 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:** \$2,880  
**IMPR.:** \$7,895  
**TOTAL:** \$10,775

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 2019 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 1-story dwelling of masonry exterior construction with 1,171 square feet of living area. The dwelling is approximately 56 years old. Features of the home include an unfinished basement and a 1-car garage. The property has a 7,200 square foot site and is located in South Holland, Thornton Township, Cook County. The subject is classified as a class 2-03 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 completed Section IV – Recent Sale Data of the appeal petition reporting that the subject property was purchased on December 7, 2017 for a price of \$96,500. The property was purchased from the owners, Marshall P. and Linda M. Anderson, and the parties to the transaction were not related. The appellant reported that the property was advertised for sale on

the Multiple Listing Service (MLS) from November 21 to December 15, 2017. The evidence indicated that the property was not sold due to a foreclosure action nor by using a contract for deed. In further support, a copy of the warranty deed recorded with the Cook County Recorder of Deeds was submitted. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the 2017 purchase price at the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$10,775. The subject's assessment reflects a market value of \$107,750 or \$92.02 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%.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales that are located in the same neighborhood code as subject property. The comparables have lots ranging in size from 6,435 to 9,583 square feet of land area. The properties are improved with 1-story, class 2-03 dwellings of masonry exterior construction ranging in size from 1,044 to 1,135 square feet of living area. The homes range in age from 54 to 62 years old. One comparable has a crawl space foundation and three comparables each have a basement with finished area. Three comparables each have central air conditioning. Each comparable has from a 1-car to a 2-car garage. The comparables sold from July 2017 to October 2019 for prices ranging from \$115,909 to \$123,000 or from \$103.80 to \$112.33 per square foot of dwelling 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 construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be board of review comparables #2 and #3 which sold more proximate in time to the subject's January 1, 2019 assessment date at issue than the subject and other comparables in this record and are similar to the subject in location, design, age, dwelling size, and most features. The comparables sold in April 2018 and October 2019 for prices of \$117,500 and \$120,000 or \$103.80 and \$105.73 per square foot of living area, land included. . The subject's assessment reflects an estimated market value of \$107,750 or \$92.02 per square foot of living area, land included, which falls below the two best comparable sales in this record. The Board gives less weight to the sale of the subject property and board of review comparables #1 and #4 which have 2017 sales date occurring approximately 13 to 18 months prior to the subject's lien date and not likely to be reflective of market conditions on the subject's lien date. Based on this record and after considering adjustments to the two best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported and a reduction in the subject's assessment is not 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.

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Chairman



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Member



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Member



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Member



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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 18, 2024



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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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APPELLANT

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