



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

APPELLANT: Aaron Maduff
DOCKET NO.: 20-42569.001-R-1
PARCEL NO.: 31-12-207-029-0000

The parties of record before the Property Tax Appeal Board are Aaron Maduff, 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 **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: \$9,500
IMPR.: \$14,500
TOTAL: \$24,000

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 2020 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 2-story dwelling of masonry exterior construction with 3,623 square feet of living area. The dwelling is approximately 67 years old. Features of the home include a partial finished basement, central air conditioning, a fireplace and a 2-car garage. The property has a 19,000 square foot site and is located in Flossmoor, Rich Township, Cook County. The subject is classified as a class 2-06 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 an appraisal estimating the subject property had a market value of \$240,000 as of January 1, 2020. The appraisal was prepared by Jerry Wicklund, a Certified Residential Real Estate Appraiser. The purpose of the appraisal was to provide a retrospective opinion of

market value as of the of January 1, 2020, for a tax assignment. The appraiser considered the subject property in average condition and has been adequately maintained.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value utilizing five comparable sales located within .94 of a mile from the subject property. The comparables have sites ranging in size from 12,439 to 69,260 square feet of land area and are improved with Traditional, Tudor, or Georgian style dwellings that range in size from 3,239 to 4,357 square feet of living area. The homes range in age from 30 to 52 years old. The comparables have features with varying degrees of similarity to the subject. The comparables sold from May 2017 to March 2019 for prices ranging from \$237,500 to \$260,000 or from \$59.67 to \$77.18 per square foot of living area, including land. The appraiser adjusted comparable #2 for financing concessions and the comparables for differences from the subject in site size, room count, gross living area, basement finished area, and/or features, to arrive at an estimated market value of \$240,000 as of January 1, 2020. Based on this evidence, the appellant requested a reduction in the subject property's total assessment to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$31,129. The subject's assessment reflects a market value of \$311,290 or \$85.92 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 within a ¼ mile from the subject and within the same assessment neighborhood code as the subject. The comparables have sites ranging in size from 12,040 to 38,850 square feet of land area and are improved with 2-story dwellings of frame or frame and masonry exterior construction that are 68 to 82 years old. The dwellings range in size from 2,269 to 4,212 square feet of living area. Three comparables have partial or full basements, one of which has finished area. One comparable has a slab foundation. Three comparables have central air conditioning. Each comparable has 1 or 2 fireplaces and a 2-car or a 3.5-car garage. The comparables sold from March 2018 to November 2020 for prices ranging from \$228,000 to \$659,600 or from \$92.25 to \$156.60 per square foot of living area, including land. Based on this evidence the board of review contends the subject's assessment is supported.

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 the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appraiser applied adjustments to the comparables for differences from the subject to arrive at an estimated market value of \$240,000. The subject's assessment reflects a

market value of \$311,290 or \$85.92 per square foot of living area, including land, which is above the appraised value. The Board gave less weight to the unadjusted comparables submitted by the board of review as comparables #1, #2 and #4 are less similar to the subject in dwelling size than the appellant's appraisal comparables and comparable #3 appears to be an outlier as it sold significantly higher than the other comparables in the record. Based on this evidence the Board finds a reduction in the subject's assessment commensurate with the appellant's 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

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 16, 2024



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Aaron Maduff, by attorney:
Brian P. Liston
Law Offices of Liston & Tsantilis, P.C.
33 North LaSalle Street
28th Floor
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602