



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

APPELLANT: Stanley Maciasz
DOCKET NO.: 23-28239.001-R-1
PARCEL NO.: 23-25-113-019-0000

The parties of record before the Property Tax Appeal Board are Stanley Maciasz, the appellant, by attorney Christopher G. Walsh, Jr., of Walsh Law, LLC 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: \$8,302
IMPR.: \$28,698
TOTAL: \$37,000

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 2023 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 is improved with a two-story, single-family dwelling of frame and masonry construction with 2,706 square feet of living area. The dwelling is 54 years old. Features include a partial unfinished basement, a two-car garage, central air conditioning, a fireplace, two full bathrooms, and a half bath. The subject occupies a 13,284 square foot site. It is located in Palos Heights, Palos Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts overvaluation in this appeal. In support of the overvaluation argument, the appellant submitted evidence disclosing that the subject property was sold on September 12, 2022, for a price of \$370,000, or \$136.73 per square foot of living area, land included. The evidence included the settlement statement relating to the transaction. The appellant filled out Section IV of the appeal petition, titled Recent Sale Data, and stated that the transfer was not

between family members or related corporations, and that the subject property was sold by a realtor, it was advertised for sale via Multiple Listing Service (MLS) and it was not sold due to a foreclosure action.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject as \$39,999. The subject's assessment reflects a market value of \$399,990 when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. The subject has an improvement assessment of \$31,697 or \$11.71 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information about four suggested comparables, and it provided sales information about those comparables. They sold between September 2021 and September 2023 for amounts ranging from \$670,000 to \$799,900, or between \$176.59 and \$247.11 per square foot of living area, land included.

Conclusion of Law

The appellant asserts overvaluation as a ground for appeal. When market value is the basis of the appeal, the taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 that the appellant met this burden of proof.

The Board's task in this case is to determine the correct assessment of the subject property. *See* 35 ILCS 200/16-180. Under Illinois law, real property must be valued at its fair cash value, meaning the price that would be paid for it at a fair, voluntary sale where the buyer and seller are both ready, willing, and able to buy and sell, but neither is compelled to do so. Bd of Educ of Meridian Community School Dist. No. 223 v. Ill. Property Tax Appeal Bd., 2011 IL App (2d) 100068, ¶ 36. A contemporaneous sale of the subject property between parties dealing at arms-length is practically conclusive on the issue of whether an assessment reflected the fair cash market value of the property. Gateway-Walden LLC v. Pappas, 2018 IL App (1st) 162714, ¶ 33.

The appellant filled out Section IV of the appeal petition, titled Recent Sale Data, and stated that the subject's transfer was not between family members or related corporations, and that the subject property was sold by a realtor, it was advertised for sale via Multiple Listing Service (MLS) and it was not sold due to a foreclosure action. The board of review presented no contrary evidence about the subject's sale, and this Board gives little weight to its sales comparables because of differences between them and the subject. This Board finds from the evidence that the subject's sale was an arm's-length transaction, and it was the best evidence of the subject's value. Accordingly, this Board finds that the subject property's fair market value as of the relevant valuation date of January 1, 2023, was \$370,000. This corresponds to an assessed value of \$37,000 under the 10% level provided in the Cook County Real Property Assessment Classification Ordinance. Because the subject's assessed value is greater than this amount, appellant is entitled to a reduction.

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:

May 19, 2026



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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