FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: JAMES & WHITNEY HOLINKA
DOCKET NO.: 23-51365.001-R-1
PARCEL NO.: 18-07-115-039-0000

The parties of record before the Property Tax Appeal Board (PTAB) are JAMES & WHITNEY HOLINKA, 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, PTAB hereby finds ***A Reduction*** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

LAND:	$42,521
IMPR.:	$207,479
TOTAL:	$250,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a Cook County Board of Review decision 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

A 6,736 square feet, two-story building of brick and stucco construction situated on a 31,497 square feet lot in Hinsdale, Lyons Township, Cook County constitutes the subject property. The three-year-old residence included 6.5 bathrooms, central air conditioning, an attached three-car garage, and a full basement. The appellant elected to forego a hearing on the petition.

The appellant asserts overvaluation as the basis of the appeal. To demonstrate the assessment exceeded the subject's market value, the appellant submitted an appraisal that opined the market valued the subject at approximately $2,200,000 as of January 1, 2023. Of the three accepted approaches to value, the appraisal developed only the sales comparison approach. The appraiser relied on six sales of suggested comparables within .77 miles of the subject property. The sales closed between December 2020 and August 2022 for amounts ranging from $1,910,000 to $2,450,000, or between $269.62 and $500.00 per living square foot. Using the properties' listed characteristics, the appraiser made up to a 13.5% gross adjustment to the comparable sale prices to address differences between the comparable and subject improvements. The appraisal described the narrower real estate market forecasts for 2023 relative to 2022 market conditions. The trainee appraiser opined that the highest and best use of the improved property was its present use after a November 22, 2023 inspection, the date of the report.

The county board of review responded in its "Notes on Appeal" that the subject was correctly assessed at $270,807. The subject's assessment reflects a market value of $2,708,070, or $402.03 per square foot of living area when using the 10% Cook County Real Estate Classification Ordinance level of assessment for class two properties and the appellant's description of the subject's living square footage. In defense of the assessment, the county board of review submitted information about three sales of purportedly comparable properties on the subject's block. The suggested comparable properties sold between November 2021 and September 2023 for sales prices between $2,265,000 and $5,455,770, or $353.02 and $497.52 per living square foot. The involved improvements ranged from 20 to 115 years in building age and 5,852 to 10,966 square feet in area and featured a full basement, a 2.5- to 3.5-car garage, and air conditioning.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessment for property tax purposes. When market value is the basis of the appeal, appellants 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 evidence of a recent sale or recent appraisal of the subject property, comparable sales, or construction costs. 86 Ill. Admin. Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant satisfied this standard of proof.

PTAB first notes that the appellant submitted an appraisal that raises some credibility concerns. The appraisal offered a forecast for 2023 real estate trends, but neglected to explain why a projection was necessary for a report issued in November 2023 (on the exact same date the appraiser purportedly inspected the subject, no less), when these trends should have been realized, not merely forecasted, by the report issuance date. Moreover, the appraiser made over 10% gross price adjustments to several sales, undermining their comparability for property tax purposes. PTAB therefore affords the appraiser's final opinion of value slightly less weight. Meanwhile, though the board of review submitted sales of properties relatively proximal in time and location to the subject, none of the board of review's sales involved improvements sufficiently similar to the subject to support the 2023 subject assessment as reflective of market value, thereby meriting a partial reduction in the assessment. Given the parties' submissions, PTAB finds the appellant demonstrated that the subject was over-assessed and a reduction in the 2023 subject assessment to $250,000 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: ________________ ________________

C E R T I F I C A T I O N

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: September 15, 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

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