



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

APPELLANT: Scott R. Flynn
DOCKET NO.: 23-51500.001-R-1
PARCEL NO.: 18-35-406-016-0000

The parties of record before the Property Tax Appeal Board are Scott R. Flynn, the appellant, by Brian P. Liston, attorney-at-law 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: \$6,703
IMPR.: \$17,736
TOTAL: \$24,439

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 consists of a site with 14,896 square feet of land area that is improved with a one-story dwelling of masonry exterior construction containing 1,420 square feet of living area. The dwelling is approximately 70 years old. Features of the property include an unfinished full basement, central air conditioning, one fireplace, 1½ bathrooms, and a 2-car garage. The property is in Justice, Lyons Township, Cook County. The subject property is a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables consisting of class 2-03 properties improved with one-story dwellings of masonry exterior construction that range in size from 1,163 to 1,699 square feet of living area. The comparables are 63 to 97 years old. Each property has a full basement, 1 or 2½ bathrooms, and a

2-car garage. One comparable has one fireplace. These properties have a different neighborhood code than the subject and are located 2.7 to 2.9 miles from the subject property. The comparables have improvement assessments that range from \$11,000 to \$15,638 or from \$9.20 to \$11.13 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$13,433.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$24,439. The subject property has an improvement assessment of \$17,736 or \$12.49 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables consisting of class 2-03 properties improved with one-story dwellings of masonry exterior construction that range in size from 1,183 to 1,412 square feet of living area and are 66 to 68 years old. One comparable has a partial basement with a formal recreation room, two comparables have crawl space foundations, and one comparable has a slab foundation. Each property has 1 or 1½ bathrooms and a 1-car or 2-car garage. Three comparables have central air conditioning. These properties have the same assessment neighborhood code as the subject property and are located ¼ of a mile from the subject or in the "subarea." The comparables have improvement assessments ranging from \$15,232 to \$18,331 or from \$12.88 to \$14.45 per square foot of living area. The board of review contends the building assessed value per square foot for the comparables are the same or higher than the subject, which supports the assessed value as equitable.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on seven equity comparables to support their respective positions. The Board finds the best evidence of assessment equity to be the board of review comparables that are more similar to the subject in location than are the comparables submitted by the appellant. The board of review comparables have varying degrees of similarity to the subject and would require adjustments to make them more equivalent to the subject property. Board of review comparables #1, #2 and #4 are significantly smaller than the subject dwelling indicating upward adjustments for size may be appropriate. With respect to features, three of the board of review comparables do not have the additional half bathroom that the subject has; three comparables have a crawl space or slab foundation while the subject has a superior full basement; none of the comparables have a fireplace like the subject; one comparable does not have central air conditioning which is a feature of the subject property; and one comparable has a smaller garage than the subject, necessitating upward adjustments to the comparables to make them more equivalent to the subject property for these differences. Nevertheless, the board of review comparables have improvement assessments that range from \$15,232 to \$18,331 or from

\$12.88 to \$14.45 per square foot of living area. The subject's improvement assessment of \$17,736 or \$12.49 per square foot of living area falls within the range of the total improvement assessments but below the range on a per square foot of living area basis as established by the best comparables in this record. Based on this record, after considering the appropriate adjustments to the best comparables, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not 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: _____

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 16, 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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