



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

APPELLANT: James Matsas
DOCKET NO.: 24-04207.001-R-1
PARCEL NO.: 02-11-208-001

The parties of record before the Property Tax Appeal Board are James Matsas, the appellant, by attorney Spiro G. Zarkos, of Verros Berkshire, PC, in Oakbrook Terrace, and the DuPage 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 **DuPage** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$41,553
IMPR.: \$145,095
TOTAL: \$186,648

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the DuPage County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 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 split-level dwelling of masonry exterior construction with 2,228 square feet of living area. The dwelling was constructed in 1968 and is approximately 56 years old. Features of the home include a 943 square foot lower level with 848 square feet of finished area, 3 bathrooms, central air conditioning, a fireplace and a two-car heated garage. The property has a 20,848 square foot site and is located in Medinah, Bloomingdale Township, DuPage County.

The appellant contends both overvaluation and lack of assessment equity as the bases of the appeal. In support of these arguments, the appellant submitted information on four comparables with both sales and equity data. The comparables are each located in the same neighborhood code and within .8 of a mile from the subject. The comparable parcels range in size from 19,930 to 20,871 square feet of land area which are improved with either a split-level, a one-story ranch

or a two-story dwelling of masonry or brick and frame exterior construction. The homes range in age from 40 to 68 years old and range in size from 2,168 to 2,517 square feet of living area. Each comparable has a basement/lower-level ranging in size from 812 to 2,208 square feet, two of which have finished areas of 406 and 1,734 square feet. Features include 1½, 2½ or 3½ bathrooms, central air conditioning, one or two fireplaces, and a two-car garage. The comparables sold from August 2022 to October 2024 for prices ranging from \$380,000 to \$570,000 or from \$150.97 to \$242.62 per square foot of living area, including land. The comparables have land assessments of \$41,553, identical to that of the subject parcel, and have improvement assessments ranging from \$99,793 to \$152,838 or from \$42.93 to \$64.46 per square foot of living area.

Based on the foregoing evidence, the appellant requested a reduced total assessment of \$153,434 which would reflect a market value of \$460,348 or \$206.62 per square foot of living area, including land. Alternatively, a reduced improvement assessment of \$111,881 or \$50.22 per square foot of living area was requested by the appellant.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$198,886. The subject's assessment reflects a market value of \$596,718 or \$267.83 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹ The subject has a land assessment of \$41,553 and an improvement assessment of \$157,333 or \$70.62 per square foot of living area.

In a memorandum, the board of review contends the only one of appellant's comparables which is similar in design to the subject is comparable #1.

In support of its contention of the correct assessment, the board of review through the township assessor submitted information on five comparables with both sales and equity data along with copies of applicable property record cards. The comparables are each located in the same neighborhood code as the subject. Using the property record cards, the comparable parcels range in size from 20,385 to 26,123 square feet of land area which are improved with either a split-level or a tri-level dwelling of masonry or brick and frame exterior construction. The homes range in age from 53 to 67 years old and range in size from 1,044 to 1,647 square feet of living area. Each comparable has a lower-level ranging in size from 506 to 910 square feet, with finished areas ranging from 404 to 819 square feet. Features include 1, 1½ or 2½ bathrooms, central air conditioning, a fireplace, and either a two-car or a three-car garage, where comparable #3 has a heated garage. The comparables sold from May 2021 to April 2024 for prices ranging from \$340,000 to \$475,000 or from \$272.92 to \$325.67 per square foot of living area, including land. The comparables have land assessments of \$41,553 or \$41,564, identical or nearly identical to that of the subject parcel and have improvement assessments ranging from \$78,918 to \$126,288 or from \$69.72 to \$77.29 per square foot of living area. Based on this evidence and argument, the board of review requested confirmation of the subject's assessment.

¹ Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2024.

Conclusion of Law

The appellant in part 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 parties submitted a total of nine suggested comparable properties with varying degrees of similarity to the subject for consideration by the Property Tax Appeal Board. The Board has given reduced weight to the five comparables presented by the board of review which range in dwelling size from 1,044 to 1,647 square feet of living area as compared to the subject dwelling containing 2,228 square feet of living area. The Board finds that the suggested comparables presented by the board of review are from approximately 26% to more than 53% smaller than the subject dwelling. In addition, the Board has given little consideration to board of review sales #2 and #5, each of which occurred in 2021, dates most remote in time to the lien date at issue of January 1, 2024. The Board has also given reduced weight to appellant's comparable #2, due to its newer age of 40 years old as compared to the subject which is 56 years old.

The Board finds the best evidence of market value to be appellant's comparable sales #1, #3 and #4, which are similar in location, lot size, overall dwelling size, air conditioning feature, fireplace feature, and garage amenity when compared to the subject. Adjustments are necessary to these three comparables for differences in age, dwelling size, basement/lower-level size, bathroom count, and/or finished basement/lower-level area when compared to the subject. In addition, the subject has a heated garage which is not identified as a feature of any of these best comparables in the record. The best three comparables sold from August 2022 to October 2024 for prices ranging from \$380,000 to \$570,000 or from \$150.97 to \$240.40 per square foot of living area, including land. The subject's assessment reflects a market value of \$596,718 or \$267.83 per square foot of living area, including land, which is above the range established by the best comparable sales in this record both in terms of overall value and on a per-square-foot of living area basis. Based on this evidence and after considering adjustments to the best comparables in the record for differences in order to make them more equivalent to the subject, the Property Tax Appeal Board finds a reduction in the subject's assessment for overvaluation is justified.

The appellant also contended unequal treatment in the subject's assessment as a basis of the appeal. Taxpayers who object to an assessment on the basis of lack of uniformity bear the burden of proving the disparity of assessment valuations by clear and convincing evidence. Kankakee County Board of Review v. Property Tax Appeal Board, 131 Ill.2d 1 (1989). After an analysis of the assessment data and considering the reduction in assessment for overvaluation, the Board finds that the subject property is equitably assessed and no further reduction in the subject's assessment is warranted on grounds of lack of assessment equity.

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: _____

December 23, 2025



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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