



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

APPELLANT: Krzysztof Krawczyk  
DOCKET NO.: 22-20035.001-R-1  
PARCEL NO.: 12-14-210-010-0000

The parties of record before the Property Tax Appeal Board are Krzysztof Krawczyk, the appellant, by Scott Shudnow, attorney-at-law of Shudnow & Shudnow, Ltd. 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:** \$13,709  
**IMPR.:** \$21,791  
**TOTAL:** \$35,500

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 2022 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 one-story dwelling of frame and masonry exterior construction containing 1,644 square feet of living area. The dwelling is approximately 65 years old. Features of the home include a crawl space foundation, central air conditioning, one fireplace, 1½ bathrooms, and a 2-car attached garage. The property has a 10,546 square foot site located in Norridge, Norwood Park Township, Cook County. The subject is classified as a class 2-03 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 \$335,000 as of January 1, 2022. The appraisal was prepared by Garry Nusinow, an Illinois Certified General Real Estate Appraiser. The appellant was identified as the client. The purpose of the appraisal was to provide a basis for the appeal of the assessment placed against the property.

The fee simple property rights were appraised. The highest and best use of the property was determined to be the property's current use as a single-family residence.

The appraiser described the subject residence as being in average to above average condition. Physical depreciation was due to normal wear and tear and is less than actual age due to modernization of the kitchen and bath. The appraiser stated in the report that the subject receives average maintenance compared to the neighborhood and competing areas and no repairs are required. He further indicated the quality of construction was average. The appraiser indicated that the subject property was inspected on December 10, 2022, and he noted no functional or external obsolescence at the time of inspection.

The appraiser developed the sales comparison approach to value using five comparable sales composed of ranch style or mid-century modern ranch style dwellings of frame or frame and masonry exterior construction that range in size from 1,451 to 1,599 square feet of living area. The homes range in age from 66 to 69 years old. None of the comparables have a basement like the subject property. Each property has central air conditioning, two comparables have one fireplace, and each property has 1½ or 2 bathrooms. Three comparables have detached 2-car garages, one comparable has a 2-car attached garage, and one comparable has a detached 4-car tandem garage. The appraiser also described the comparables as having features such as pavers, a patio or a deck with one property also having irrigation. He further indicated comparables #1 and #2 were in average+ condition; comparables #3 and #4 were in average conditioning, and comparable #5 was in average- condition, while the subject was in average+ condition. The comparables are located in Norridge or Chicago from approximately .55 to .90 of a mile from the subject property with sites ranging in size from 8,500 to 11,660 square feet of land area. The appraiser also indicated comparable sales #1, #4 and #5 were located along busy streets. These properties sold from September 2020 to October 2021 for prices ranging from \$275,000 to \$371,000 or from \$184.33 to \$232.02 per square foot of living area, including land.

The appraiser adjusted the comparables for differences from the subject to arrive at adjusted prices ranging from \$313,000 to \$359,500. He explained in the report that sale #2 required a downward adjustment for concessions as the buyer received a credit at the closing. No adjustments for site size were required as all sales have similar utility and zoning as the subject, that being for the development of a detached single-family residence. Sales #1, #4 and #5 required upward adjustments for their inferior residential locations calculated at approximately 3% of their sale prices. Sales #2, #4 and #5 required upward adjustments for their inferior quality of construction and were calculated at approximately 1% of their sale prices. Sales #3 and #4 and to a greater degree sale #5 required upward adjustments for their inferior condition, with sales #3 and #4 being adjusted at approximately \$10 per square foot of their above grade gross living area and sale #5 being adjusted at approximately \$20 per square foot of its above grade gross living area. Sales #2 and #5 require downward adjustments for their superior bath counts at \$3,500 per half bath. Sales #3, #4 and #5 require upward adjustments for their inferior smaller above grade gross living area with the adjustment for size being made if the difference in gross living area exceeded 100 square feet, then adjusted at \$45 per square foot and rounded to the nearest \$1,000. All other necessary adjustments were made as indicated in the sales comparison analysis grid. Based on these sales the appraiser arrived at an estimated market value for the subject property of \$335,000 or \$201.32 per square foot of living area, including land, as of January 1, 2022.

Based on this evidence the appellant requested the subject's total assessment be reduced to \$33,500 to reflect the appraised value.

The appellant submitted a copy of the decision issued by the board of review disclosing the property had a final total assessment of \$36,037. The subject's assessment reflects a market value of \$360,370 or \$219.20 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%.

The board of review submitted its "Board of Review Notes on Appeal" in which it disclosed the incorrect total assessment of the subject property. In support of its contention of the correct assessment the board of review submitted information on four comparable sales composed of class 2-03 properties improved with one-story dwellings of masonry or frame and masonry exterior construction that range in size from 1,434 to 1,727 square feet of living area. The homes are either 63 or 64 years old. Each comparable is described as having a full or partial basement with one having finished area, central air conditioning, and a 1-car or a 2-car garage. The comparables also have 1, 1½ or 2 bathrooms. These properties have sites ranging in size from 8,631 to 9,815 square feet of land area. The comparables have the same assessment neighborhood code as the subject property and are located approximately ¼ of a mile from the subject. The sales occurred from January 2018 to August 2021 for prices ranging from \$365,000 to \$470,000 or from \$238.25 to \$306.83 per square foot of living area, including land.

In rebuttal the appellant's counsel asserted the board of review did not submit a full professional appraisal but submitted four unadjusted raw sales. The appellant's counsel submitted copies of the Multiple Listing Service (MLS) data sheets for the board of review comparable sales disclosing the comparables have substantial recent upgrades and/or rehabilitation. Counsel contends board of review comparable #1 is an older sale that occurred in 2019, the home is completely remodeled and was rehabbed in 2018 prior to the sale, and the property has a full basement that is finished, unlike the subject property. Comparable #2 is described as an older 2018 sale with an in-ground heated pool and a full basement with a formal recreation room. Counsel contends comparable #3 is an older 2018 sale of a home that was rehabbed in 2017, prior to the sale. The MLS sheet also disclosed comparable #3 has a basement with finished area. The appellant's counsel argued that board of review comparable #4 was rehabbed in 2020, prior to its sale. The MLS sheet described the property as having a finished basement containing two bonus rooms with one being used as a movie theatre.

### **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 estimating the subject had a market value of \$335,000 as of January 1, 2022. The report disclosed the appraiser inspected the exterior and exterior of the subject property. The appraiser developed the sales comparison approach to value and selected comparables sales that were similar to the subject in location improved with homes that were without basements, like the subject property. The sales occurred relatively close to the assessment date at issue for prices ranging from \$275,000 to \$371,000 or from \$184.33 to \$232.02 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject to arrive at adjusted prices ranging from \$313,000 to \$359,500. The appraiser explained the adjustment process, which appeared logical, and was not refuted by the board of review. The appraised value of \$335,000 is less than the market value reflected by the subject's total assessment of \$360,370.

The Board gives less weight to the comparable sales submitted by the board of review as these comparables were not adjusted for differences from the subject; comparable sales #1, #2 and #3 were somewhat dated in relation to the tax year at issue occurring in 2018 and 2019; each comparable has a basement with finished area which is unlike the subject dwelling, and three of the comparables were rehabbed prior to their respective sales. Due to these issues, the Board has given reduced weight to the evidence submitted by the board of review.

Based on this evidence the Board finds a reduction in the subject's assessment commensurate with the appellant's request to reflect the appraised value is appropriate.

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: \_\_\_\_\_

October 21, 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

AGENCY

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

APPELLANT

Krzysztof Krawczyk, by attorney:  
Scott Shudnow  
Shudnow & Shudnow, Ltd.  
77 West Washington Street  
Suite 1620  
Chicago, IL 60602

COUNTY

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