



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

APPELLANT: Zbigniew & Ewa Romanowski
DOCKET NO.: 22-31370.001-R-1
PARCEL NO.: 12-21-432-026-0000

The parties of record before the Property Tax Appeal Board are Zbigniew & Ewa Romanowski, the appellants, by attorney Scott Shudnow, 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: \$5,428
IMPR.: \$25,172
TOTAL: \$30,600

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 consists of a two-story dwelling of frame exterior construction with 1,914 square feet of living area. The dwelling is approximately 18 years old with a reported effective age of 15 years. Features include a basement which is partially finished, central air conditioning, 2½ bathrooms, a fireplace and a two-car garage. The property has a 6,032 square foot site and is located in Franklin Park, Leyden Township, Cook County. The subject is classified as a class 2-07 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted an appraisal prepared by Michael S. Leigh, a Certified Residential Real Estate Appraiser, and supervised by Garry Nusinow, a Certified General Real Estate Appraiser, for the purpose of challenging the assessment. Through use of the sales comparison approach,

the appraisers estimated the subject property had a market value of \$306,000 as of January 1, 2022.

Leigh and Nusinow analyzed five sales of comparable properties located from .03 to .54 of a mile from the subject. The parcels range in size from 4,500 to 6,200 square feet and are each improved with a residential dwelling described as Traditional, Bungalow or Cape Cod. The homes range in actual age from 60 to 107 years old with reported effective ages ranging from 15 to 25 years old. The homes range in size from 1,300 to 2,512 square feet of living area. Each comparable has a basement, four of which have finished area, central air conditioning, 2 full bathrooms, and a one-car or a two-car garage. Three homes have one or three fireplaces. As to condition of the comparables, four homes were described as average+ with comparable #1 having been rehabbed in 2018; comparable #2 having been updated; comparable #3 having been rehabbed in 2006; comparable #4 having been rehabbed in 2012; and comparable #5 having been rehabbed and an addition constructed in 2000. The sales occurred from February to October 2021 for prices ranging from \$283,000 to \$330,000 or from \$131.37 to \$219.23 per square foot of living area, including land.

Next, appraisers applied adjustments to sales #1 and #4 for a financing concessions of \$5,000 each at closing. A downward adjustment was applied to sale #5 for condition. Upward adjustments were applied to each comparable to account for an inferior bathroom count when compared to the subject. Comparables #4 and #5 were each adjusted for differences in dwelling size. Four comparables were adjusted in various aspects for basement size and/or basement finish. Comparable #3 was adjusted for inferior garage capacity, two comparables were adjusted for differences in various outdoor amenities, and two comparables were adjusted for differences in fireplace count. Through this process, the appraiser set forth adjusted sales prices for the comparables ranging from \$294,500 to \$321,500, including land. As part of the addendum, Merel reported most weight was given to sale #2, reflecting an adjusted sale price of \$667,000, for similarity in age, living area and interior finishes.

In the addendum, the appraisers quantified the weight given to each of the five sales ranging from 15.36 to 23.29 resulting in the final value opinion for the subject. In reconciliation based on the sales comparison approach, Leigh and Nusinow determined the subject has a market value of \$306,000 as of January 1, 2022. Based on the foregoing, the appellants requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$34,999. The subject's assessment reflects a market value of \$349,990 or \$182.86 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%.

In support of its contention of the correct assessment, the board of review submitted information on one comparable sale located in the subject's assessment neighborhood code. The parcel contains 5,080 square feet of land area which is improved with a class 2-07 two-story dwelling of frame and masonry exterior construction. The home is 57 years old and contains 726 square feet of living area. The home has a concrete slab foundation, 1 full bathroom, central air

conditioning, and a two-car garage. The property sold in October 2022 for a price of \$176,000 or for \$242.42 per square foot of living area, including land.

Based on the foregoing evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellants argued that the board of review did not supply an appraisal, did not comment on the sales contained in the appellants' appraisal report and provided one unadjusted sale of a property which the appellants contend is dissimilar given its dwelling size, which is 62% smaller than the subject, differing exterior construction, differing foundation type and located 1.4-miles from the subject. Given the foregoing data, the appellants contend that the board of review sale should not be given any weight.

Conclusion of Law

The appellants contend 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 appellants met this burden of proof and a reduction in the subject's assessment is warranted.

The appellants submitted an appraisal of the subject property, and the board of review submitted one comparable sale in support of the parties' respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the board of review sale, due to its significantly smaller dwelling size when compared to the subject and its lack of a basement foundation which is a feature of the subject. In addition, this comparable dwelling is significantly older than the subject dwelling as of the valuation date at issue. In summary, the Board finds the suggested comparable sale is sufficiently dissimilar to the subject, and in the absence of adjustments, given these significant differences, the sale fails to support the subject's assessment and also fails to overcome the value opinion in the appellant's appraisal report.

The Board finds the best evidence of market value on this record is the appraisal submitted by the appellants. The Board finds the appraisal depicts a logical and well-reasoned analysis of the subject's immediate area, market conditions at the relevant period of time, and presents a consistent, logical analysis of comparable sales located in relatively close proximity to the subject in order to arrive at an opinion of the market value of the subject property as of the tax year at issue. The subject's assessment reflects a market value of \$349,990 or \$182.86 per square foot of living area, including land, which is above the appraised value conclusion of \$306,000 or \$159.87 per square foot of living area, including land.

In conclusion, the Board finds the subject property had a market value of \$306,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. (86 Ill.Admin.Code §1910.50(c)(2)). The Board finds a reduction in the subject's total assessment commensurate with the appellants' request is warranted.

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: _____

August 19, 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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