



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

APPELLANT: Sylwia Karpowicz
DOCKET NO.: 22-42113.001-R-1
PARCEL NO.: 03-31-411-032-0000

The parties of record before the Property Tax Appeal Board are Sylwia Karpowicz, 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: \$13,279
IMPR.: \$56,721
TOTAL: \$70,000

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 two-story dwelling of brick, stucco and frame exterior construction containing 3,333 square feet of living area.¹ The dwelling is approximately 21 years old. Features of the property include a full basement with finished area, central air conditioning, two fireplaces, 3½ bathrooms, and a 2-car garage. The property has an 11,066 square foot site located in Arlington Heights, Wheeling Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The Board finds the best evidence of size of the subject dwelling was contained in the appraisal submitted by the appellant that contained sketches of the home with dimensions and calculations. The board of review submitted no documentation to support its reported size of the subject dwelling.

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 \$700,000 as of January 1, 2022. The appraisal was prepared by Michael Leigh, a Certified Residential Real Estate Appraiser, and Garry Nusinow, a Certified General Real Estate Appraiser. The purpose of the appraisal was to determine an opinion of market value for the subject property to provide a basis for the appeal of the assessment placed against the property for ad valorem taxation by the Cook County Assessor's Office. The property rights appraised were the unencumbered fee simple estate. The highest and best use of the property was determined to be the present use. Michael Leigh conducted an interior and exterior inspection of the property on October 26, 2022. Garry Nusinow conducted an exterior inspection of the property on October 27, 2022. The appraisal contained copies of a number of photographs of the exterior and interior of the subject home.

The appraisers developed the sales comparison approach to value using six comparable sales improved with two-story style dwellings that ranged in size from 2,789 to 3,394 square feet of living area. The homes range in age from 5 to 36 years old. Each comparable has a basement with four having finished area, central air conditioning, and a 2-car or 3-car garage. The comparables have 2½, 3 or 4 bathrooms. Five of the comparables each have one fireplace. These properties have sites ranging in size from 8,732 to 15,728 square feet of land area. Each property is located in Arlington Heights from .35 of a mile to .79 of a mile from the subject property. The sales occurred from April 2021 to December 2021 for prices ranging from \$675,000 to \$745,000 or from \$218.03 to \$256.99 per square foot of living area, including land. The appraisers adjusted the comparables for differences from the subject for such characteristics as location, site size, condition, room count, gross living area, basement finish, garage size, patio/decking, and fireplace count. The appraisers arrived at adjusted prices ranging from \$677,500 to \$723,200. Based on this analysis the appraisers estimated the subject property had a market value of \$700,000 as of January 1, 2022. The appellant requested the subject's total assessment be reduced to \$70,000 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$72,000. The subject's assessment reflects a market value of \$720,000 or \$216.02 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% and using 3,333 square feet of gross living area as the size of the subject dwelling.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales composed of class 2-78 properties improved with two-story dwellings of frame and masonry construction that range in size from 2,248 to 2,657 square feet of living area. The homes range in age from 56 to 60 years old. Each property has a partial basement with two having finished area, two comparables have central air conditioning, three comparables each have one fireplace, and each property has a 2-car or 2.5-car garage. Each comparable has two bathrooms and three comparables have an additional one or two half bathrooms. The comparables have sites ranging in size from 8,712 to 11,220 square feet of land area. These properties have the same assessment neighborhood code as the subject property and are located in the "subarea" or ¼ of a mile from the subject property. These properties sold from April to

September 2022 for prices ranging from \$450,000 to \$635,000 or from \$200.18 to \$267.03 per square foot of living area, including land.

The appellant's counsel submitted rebuttal comments asserting the board of review submitted unadjusted raw sales unlike the appellant's appraisal which have comparable sales with professional adjustments. Counsel also argued the unadjusted sales submitted by the board of review bracket the appraised value on a per square foot of living area basis demonstrating the appraised value of the subject is fair, reasonable, reliable and falls within an acceptable range of the comparable sales. Finally, counsel contends the above grade improvement assessed value per square foot for the board of review comparables is \$15.29, which is lower than the subject's improvement assessment of \$17.31 per square foot, further supporting a reduction in the subject's assessment.

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 \$700,000 as of January 1, 2022. The appellant's appraisers developed the sales comparison approach using six comparable sales that are more similar to the subject property in age and dwelling size than are the comparables sales presented by the board of review. Additionally, the appellant's appraisers adjusted the comparable sales for differences from the subject property, which appear to be logical and well-reasoned. Less weight is given the board of review comparables due to differences from the subject dwelling in size and age as well as the fact there are no adjustments to the comparables for differences from the subject dwelling as was performed by the appellant's appraisers. The subject's assessment reflects a market value of \$720,000 or \$216.02 per square foot of living area, including land, which is above the appraised value presented by the appellant. Based on this evidence the Board finds a reduction in the subject's assessment to reflect the appraised value presented by the appellant 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

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:

February 17, 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

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

APPELLANT

Sylwia Karpowicz, 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