



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

APPELLANT: Jerzy Ciastkowski  
DOCKET NO.: 22-46632.001-R-1  
PARCEL NO.: 13-19-427-021-0000

The parties of record before the Property Tax Appeal Board are Jerzy Ciastkowski, the appellant, by attorney Andrew S. Dziuk of Andrew Dziuk, Esq. 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:** \$12,250  
**IMPR.:** \$13,703  
**TOTAL:** \$25,953

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 consists of a one-story dwelling of masonry exterior construction with 1,218 square feet of living area.<sup>1</sup> The dwelling is approximately 83 years old. The home features an unfinished basement, one full bathroom and a two-car garage. The property has a 4,375 square foot site and is located in Chicago, Jefferson 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 assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables that have the same assessment neighborhood code and property classification code

---

<sup>1</sup> The board of review described the subject dwelling with a one-story design that has an unfinished basement, which was not refuted by the appellant.

as the subject. The comparables are improved with dwellings of masonry exterior construction ranging in size from 1,314 to 1,416 square feet of living area. The dwellings are from 70 to 93 years old. The comparables each have a full basement. No data was provided regarding basement finish, if any for the comparables. Each comparable has one or two full bathrooms and from a 1-car to a 2.5-car garage. Two comparables each have an additional half bathroom and one comparable has a fireplace. The comparables have improvement assessments that range from \$14,032 to \$16,101 or from \$10.68 to \$11.46 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$13,008 or \$10.68 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$31,000. The subject property has an improvement assessment of \$18,750 or \$15.39 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 that have the same assessment neighborhood code and property classification code as the subject. The comparables are improved with one-story dwellings of frame, masonry or frame and masonry exterior construction ranging in size from 1,003 to 1,096 square feet of living area. The dwellings are from 63 to 98 years old. One comparable has a concrete slab foundation and three comparables each have a full basement, one of which is finished with a formal recreation room. Each comparable has one full bathroom. Comparable #4 has an additional half bathroom and central air conditioning. Comparable #2 has a 1-car garage. The comparables have improvement assessments that range from \$16,576 to \$18,080 or from \$16.04 to \$17.47 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

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

The parties submitted nine comparable properties for the Board's consideration. The Board has given less weight to the four board of review comparables due to differences from the subject dwelling in age and/or foundation type. Additionally, three of the four comparables lack a garage, a feature of the subject and one comparable has central air conditioning, unlike the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables, which have the same assessment neighborhood code and property classification code as the subject. These five comparables are overall more similar to the subject dwelling in size, age, foundation type and some features. The comparables have improvement assessments that range from

\$14,032 to \$16,101 or from \$10.68 to \$11.46 per square foot of living area. The subject's improvement assessment of \$18,750 or \$15.39 per square foot of living area is greater than the best comparables in this record. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's improvement assessment is excessive. Therefore, based on this record the Board finds a reduction in the subject's improvement assessment is 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: \_\_\_\_\_

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

AGENCY

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

APPELLANT

jerzy ciastkowski, by attorney:  
Andrew S. Dziuk  
Andrew Dziuk, Esq.  
525 North Ada Street  
#29  
Chicago, IL 60642

COUNTY

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