



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

APPELLANT: Donald Czerwonka
DOCKET NO.: 23-21607.001-R-1
PARCEL NO.: 27-05-316-011-0000

The parties of record before the Property Tax Appeal Board are Donald Czerwonka, the appellant(s), by attorney Dora Cornelio, of Schmidt Salzman & Moran, 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 **No Change** 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: \$10,143
IMPR.: \$64,333
TOTAL: \$74,476

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 2023 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 an 18-year-old, two-story, single-family dwelling of frame and masonry construction with 4,109 square feet of living area. The property, located in Orland Park, Orland Township, Cook County, has a 13,525 square foot site. Features of the home include a full basement, one fireplace, no central air conditioning a three-car garage and three and a half baths. The subject property is classified as 2-08 under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with regard to the subject improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables with varying degrees of similarity to the subject property. All are masonry or frame and masonry construction. They ranged in size from 3,904 to 4,800 square feet of living area. Four of the suggested comparable properties have two fireplaces and the other has one. The

number of bathrooms range from two to four. All of the suggested properties have full basements and air conditioning. Three of the comparable properties have a three-car garage, one has a four-car garage and one has a two-car garage. The record is silent as to the proximity of the comparable properties to the subject property. The comparables range in age from thirty to sixty-two years old. The comparables have improvement assessments ranging from \$8.81 to \$9.82 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$49,014.

The appellant submitted evidence, including a board of review decision letter dated January 11, 2024, that shows the total assessment for the subject property as \$74,476. The subject property has an improvement assessment of \$64,333 or \$15.66 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" erroneously omitting the assessment after the Board of Review action and stating only the assessment prior to the Board of Review action. The equity grid on the second page of the Board of Review Notes on Appeal erroneously states the land assessment, the improvement assessment and the total assessment as it was prior to the Board of Review action. In support of its contention of the correct assessment the board of review submitted information on four equity comparables. The suggested comparable properties ranged in size from 4,076 to 4,470 square feet of living area. All are masonry or frame and masonry construction. Three of the suggested comparable properties have one fireplace and one has none. All the suggested properties have full basements. Each of the suggested comparables was listed as having central air conditioning. Three have three-car garages and one has a 3.5 car garage. The number of bathrooms range from three and a half to five and a half. The Board of Review reported that three of the suggested comparables are on the same block as the subject property and the other is located within a quarter-mile of the subject. Two of the comparables are nineteen years of age and two are eighteen. The comparables have improvement assessments ranging from \$17.92 to \$18.78 per square foot of living area. Based on this evidence, the board of review requested that the assessment be confirmed.

Conclusion of Law

The taxpayer asserts assessment inequity as the basis of the appeal. The Illinois Constitution requires that real estate taxes, "be levied uniformly by valuation ascertained as the General Assembly shall provide by law." Ill. Const. art. IX, §4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). This uniformity provision of the Illinois Constitution does not require absolute equality in taxation, however, and it is sufficient if the taxing authority achieves a reasonable degree of uniformity. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by the appellant by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e); Walsh, 181 Ill. 2d at 234 (1998). Clear and convincing evidence means more than a preponderance of the evidence, but it does not need to approach the degree of proof needed for a conviction of a crime. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of assessment equity to be appellant's comparable #1, #3 and #4 and the board of review's comparables #1, #2, and #3. These comparable properties had more similarity with the subject property in terms of living area and age and – in the case of the Board of Reviews comparables - proximity to the subject property. In contrast, the appellant's comparables #2, and #5 are less similar to the subject property in terms of livable area. Appellant's comparable #5 is also considerably older than the subject property. Board of Review comparable #4 has two more full bathrooms than the subject. The Board finds that these comparables are afforded less weight based on these distinguishing characteristics.

The best evidence comparables ranged in improvement assessment of \$8.81 to \$18.03 per square foot of living area. The subject's improvement assessment of \$15.66 per square foot of living area falls within the range established by the best comparables in this record. After considering adjustments to these comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is supported. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not 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:

April 21, 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

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