



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

APPELLANT: David Grzesnikowski
DOCKET NO.: 23-52835.001-R-1
PARCEL NO.: 18-31-407-002-0000

The parties of record before the Property Tax Appeal Board are David Grzesnikowski, the appellant, by John W. Zapala, attorney-at-law of the Law Offices of John Zapala, P.C. 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: \$21,000
IMPR.: \$16,500
TOTAL: \$37,500

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 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 a 26,250 square foot site improved with a two-story dwelling of frame construction that contains 1,295 square feet of living area. The dwelling is approximately 49 years old. Features of the property include a slab foundation and one bathroom. The property is located in Willow Springs, Lyons Township, Cook County. The subject is a class 2-07 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables composed of class 2-07 properties improved with two or more story dwellings of masonry, frame or frame and masonry exterior construction that range in size from 1,705 to 1,972 square feet of living area. The homes are from 38 to 50 years old. Each property has a partial or full basement, one comparable has central air conditioning, and two comparables have

a 2-car or 2.5-car garage. The comparables have one or two full bathrooms, and two comparables have an additional one or two half bathrooms. The comparables have the same neighborhood code as the subject and are located within .36 of a mile from the subject property. The comparables have improvement assessments ranging from \$20,380 to \$24,000 or from \$10.90 to \$12.17 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$14,121.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$37,500. The subject property has an improvement assessment of \$16,500 or \$12.74 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 consisting of class 2-07 properties improved with two-story dwellings of frame, masonry or frame and masonry exterior construction that range in size from 1,197 to 1,599 square feet of living area and are from 48 to 55 years old. Two comparables have slab foundations and two comparables have partial basements with one being finished with a formal recreation room. Two comparables have central air conditioning and one fireplace. Three comparables each have a 2-car garage. Each of the comparables has one full bathroom and two comparables have an additional one or two half bathrooms. The comparables have the same neighborhood code as the subject with comparable #1 being located in the same block and along the same street as the subject. The comparables have improvement assessments ranging from \$17,000 to \$30,145 of from \$12.97 to \$19.32 per square foot of building area.

Conclusion of Law

The appellant 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on seven equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to the appellant's comparables as these properties are improved with dwellings that are the least similar to the subject in dwelling size. The board of review comparables are more similar to the subject in dwelling size than are the comparables provided by the appellant but have varying degrees of similarity to the subject in features that would require adjustments to make them more equivalent to the subject property. Of the board of review comparables, the Board gives the least weight to comparable #4 due to its significantly superior features relative to the subject such as finished basemen area, additional two half bathrooms, central air conditioning, one fireplace, two-car garage and the additional 304 square feet of living area. Board of review comparable #1 has a partial basement, which is superior to the subject's slab foundation, necessitating a downward adjustment for this difference. Board of review comparable #2 has a slab foundation, like the subject, but has a 2-car garage, unlike the subject, that would require a downward adjustment for this difference. Board of review comparable #3

has a slab foundation, like the subject, but has superior features such as an additional ½ bathroom, central air conditioning, one fireplace and a 2-car garage that would require downward adjustments to this property to make it more equivalent to the subject for these dissimilarities. Board of review comparables #1 through #3 have improvement assessments ranging from \$17,000 to \$24,264 or from \$12.97 to \$19.32 per square foot of living area. The subject's improvement assessment of \$16,500 or \$12.74 per square foot of living area falls below the range established by the best comparables in this record which is appropriate given the differing features between these comparables and the subject property. 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: June 16, 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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