FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jadwiga Zmuda
DOCKET NO.: 24-41680.001-R-1
PARCEL NO.: 12-25-121-002-0000

The parties of record before the Property Tax Appeal Board are Jadwiga Zmuda, the appellant(s), by attorney Jessica Hill-Magiera, Attorney at Law in Lake Zurich; 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:	$5,184
IMPR.:	$19,816
TOTAL:	$25,000

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 2024 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 single-story dwelling of frame construction, approximately ninety-eight years-old, with 1,110 square feet of living area on a 3,840 square foot lot in Elmwood Park, Leyden Township, Cook County. The subject is classified as 2-03 under the Cook County Real Property Assessment Classification Ordinance. Features of the home include one full bathroom, a slab foundation and a detached two-car garage.

The appellant contends overvaluation as the basis of appeal. In support of its market value argument, the appellant completed Section IV – Recent Sale Data in its Residential Appeal Form indicating the subject property was purchased on December 29, 2023, for $250,000 or $225.22 per square foot of living area. The appellant indicates that the sale did not occur between family members or related companies, was sold through a realtor and was listed on the multiple listing service (MLS) for a period of thirty-four days. The appellant submitted a closing statement

which shows commissions paid to the buyer's and seller's realtors and fees paid to the buyer's and seller's attorneys. Based on this evidence, the appellant is requesting an assessment of $25,000.

The board of review submitted its "Board of Review Notes on Appeal" stating the total valuation assessment for the subject property as $30,000 with an improvement assessment of $24,816. The valuation assessment reflects a market value of $300,000 when applying the 10% Cook County Real Estate Classification Ordinance assessment for class two properties, or $270.27 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales which occurred from January 24, 2022, to July 19, 2023, for prices ranging from $295,000 to $396,000 or $265.77 to $360.00 per square foot of living area. The comparable properties are single-story dwellings of masonry construction, ranging in age from ninety-six to ninety-eight years-old. All with 1,110 square feet of living area and full basements and all located within a quarter-mile of the subject property.

In rebuttal, the appellant's attorney argued that the December 29, 2023, sale of the subject is the best evidence of market value in the record.

Conclusion of Law

The appellant contends that 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 proven by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). Proof of market value may consist of a recent sale or appraisal of the subject property, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant *did meet* this burden of proof.

The Board finds that the best evidence of market value to be the December 29, 2023, sale of the subject property for a price of $250,000. The board of review has not refuted the arms-length nature of the sale which did not occur between family members, was sold through a realtor and was listed on the MLS for thirty-four days. Both parties to the sale were represented by realtors and attorneys. Based on this record, the Board finds that the subject property had a market value of $250,000. The Board finds that the market value established by the purchase price is below the assessment and therefore a reduction in the subject's assessment *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

Member

DISSENTING:

C E R T I F I C A T I O N

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: November 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 9-215 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

Jadwiga Zmuda, by attorney:
Jessica Hill-Magiera
Attorney at Law
790 Harvest Drive
Lake Zurich, IL 60047

COUNTY

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