



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

APPELLANT: Dariusz Kudzia
DOCKET NO.: 24-53508.001-R-1
PARCEL NO.: 13-10-401-017-0000

The parties of record before the Property Tax Appeal Board are Dariusz Kudzia, 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: \$13,335
IMPR.: \$20,666
TOTAL: \$34,001

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 one-story dwelling of frame exterior construction with 1,242 square feet of living area. The dwelling is approximately 104 years old. Features of the property include a concrete slab foundation, one bathroom and a one-car garage. The property has a 3,810 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 as the subject and are located within .70 of a mile from the subject property. The comparables are class 2-03 properties improved with dwellings of frame exterior construction ranging in size from 1,067 to 1,339

square feet of living area. The dwellings range in age from 98 to 115 years old. One comparable has a crawl space foundation and four comparables each have a full basement. Each comparable has one bathroom and four comparables each have a two-car garage. The comparables have improvement assessments that range from \$17,820 to \$22,485 or from \$16.64 to \$16.79 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement be reduced to \$20,666 or \$16.64 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 \$36,560. The subject property has an improvement assessment of \$23,225 or \$18.70 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 as the subject and are located within a subarea of the subject. The comparables are class 2-03 properties improved with one-story or one and one-half-story dwellings of frame or masonry exterior construction ranging in size from 1,045 to 1,314 square feet of living area. The dwellings are from 87 to 106 years old. The comparables each have a full basement, two within finished area. Three comparables have central air conditioning. Each comparable has one or two bathrooms and either a one-car or a two-car garage. The comparables have improvement assessments that range from \$20,104 to \$28,063 or from \$19.19 to \$23.74 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 appellant's comparables #2 and #4 due to their smaller dwelling size, when compared to the subject or they lack a garage, a feature of the subject. The Board has given reduced weight to the board of review comparables which have central air conditioning, unlike the subject and/or differ from the subject dwelling in age or size.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1, #3 and #5, which are similar to the subject in location, dwelling size, age and bathroom count. However, the Board finds two comparable have a basement foundation, unlike the subject and each comparable has a larger garage capacity, when compared to the subject, suggesting downward adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, these comparables have improvement assessments that range from \$20,938 to \$22,485 or from \$16.64 to \$16.79 per square foot of living area. The subject's improvement assessment of \$23,225 or \$18.70 per square foot of living area falls above the

range established by the best comparables in the record. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's improvement assessment is excessive. Based on this record, the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment commensurate with the appellant's request is warranted.

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: _____

July 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

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

APPELLANT

Dariusz Kudzia, 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