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ILLINOIS LAW MANUAL

CHAPTER V

PREMISES LIABILITY

F. LANDLORD'S LIABILITY FOR INJURIES OCCURRING OFF PREMISES

1. Basic Law

As a general rule, a landowner is not liable for injuries occurring upon land not owned or occupied by him, but a duty may extend beyond the precise property line to include means of ingress and egress. Burke v. Grillo, 227 Ill. App. 3d 9 (1992). However, a landowner has no general duty to ensure that a sidewalk is safe. Id.

2. Analysis

An owner or occupier of land may owe a duty of reasonable care in regard to a public sidewalk or parkway where the landowner or occupier has appropriated that public area for his own use. Evans v. Koshgarian, 234 Ill. App. 3d 922 (1992).

If an adjacent landowner merely shovels snow or mows the grass on a municipal sidewalk or parkway, those acts are insufficient to show that he had appropriated the area for his own use. Burke v. Grillo, 227 Ill. App. 3d 9 (1992).

The duty to provide a reasonably safe means of ingress or egress beyond precise property lines does not extend to obvious dangers. Popp v. Cash Station, Inc., 244 Ill. App. 3d 87 (1992) (landowner owed no duty to protect patrons of automatic teller machine from third-party crimes committed while in use of machine).