



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

APPELLANT: Daniel Zurakov
DOCKET NO.: 24-02823.001-R-1
PARCEL NO.: 16-23-417-028

The parties of record before the Property Tax Appeal Board are Daniel Zurakov, the appellant, by attorney Glenn Guttman of Rieff Schramm Kanter & Guttman in Chicago; and the Lake 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 **Lake** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$103,300
IMPR.: \$229,691
TOTAL: \$332,991

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Lake 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 2-story dwelling of brick exterior construction with 2,957 square feet of living area.¹ The dwelling was constructed in 1925 and is approximately 99 years old. The dwelling has a reported effective year built of 1947 due to remodeling in 1990. Features of the home include a basement with finished area, central air conditioning, a fireplace, and a garage with 360 square feet of building area. The property has an approximately 12,109 square foot site and is located in Highland Park, Moraine Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on September 27, 2021 for a price of \$825,000. The appellant disclosed in Section IV of the appeal petition that

¹ The Board finds the best description of the subject property is found in the subject's property record card submitted by the board of review, which was not refuted by the appellant.

the subject property was purchased from Daniel Zurakov, the parties to the transaction were not related, the property was sold by a realtor and had been advertised in the Multiple Listing Service (MLS) for a period of 71 days. The appellant also disclosed the property was not sold due to a foreclosure, nor was it sold using a contract for deed. To document the sale, the appellant submitted the MLS printout and the settlement statement which reiterated the sale date and sale price and depicted the distribution of commissions.

In further support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$825,000 as of August 17, 2021. The appraisal was prepared by Bogdan Piechowicz, a Certified Residential Real Estate Appraiser. The intended use of the appraisal report was to evaluate the subject property for a purchase transaction.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value selecting three comparable sales that are located within .29 of a mile from the subject property and have varying degrees of similarity to the subject in site size, dwelling size, design, age and features. The comparables sold in April or July 2021 for prices ranging from \$794,500 to \$900,000 or from \$251.82 to \$263.09 per square foot of living area, land included. The appraiser adjusted the comparables for differences from the subject to arrive at an opinion of market value for the subject of \$825,000.

Based on this evidence, the appellant requested an assessment reflective of the sale price and appraised value conclusion at the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$332,991. The subject's assessment reflects a market value of \$999,073 or \$313.58 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales that have the same assessment neighborhood code as the subject and are located within .91 of a mile from the subject property. The comparables have sites that range in size from 10,701 to 21,369 square feet of land area and are improved with 2-story or 2.5-story dwellings of wood siding exterior construction ranging in size from 2,900 to 3,148 square feet of living area. The dwellings are from 94 to 104 years old. The comparables each have a basement, two of which have finished area. Each comparable has central air conditioning, a fireplace and a garage ranging in size from 378 to 576 square feet of building area. The comparables sold in May or June 2024 for prices ranging from \$1,025,000 to \$1,248,000 or from \$335.99 to \$396.44 per square foot of living area, land included.

Based on this evidence, the board of review requested the subject's assessment be confirmed.

² Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

Conclusion of Law

The appellant contends 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 proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant provided evidence regarding the sale of the subject property, as well as an appraisal of the subject property and the board of review submitted six comparables sales for the Board's consideration. The Board has given little weight to the sale price and appraised value of the subject property due to the facts that the appraised value has an effective date of August 17, 2021 and the property has a sale date of September 27, 2021, both of which occurred approximately 2 years and 4 months or 2 years and 3 months prior to the lien date at issue and are thus less likely to be indicative of the subject's market value as of the January 1, 2024 assessment date. Moreover, all three comparable sales contained within the appellant's appraisal occurred in 2021 and are, thus, less likely to be indicative of market value as of the subject's January 1, 2024 assessment date.

The Board finds the best evidence of market value in the record to be board of review three comparable sales submitted by the board of review, which sold more proximate in time to the January 1, 2024 assessment date and are similar to the subject in location, dwelling size, design, age and some features. However, board of review comparable #3 has a substantially larger site size and no basement finish, suggesting adjustments for these differences would be required to make this comparable more equivalent to the subject. Nevertheless, these three properties sold in May or June 2024 for prices ranging from \$1,025,000 to \$1,248,000 or from \$335.99 to \$396.44 per square foot of living area, including land. The subject's assessment reflects a market value of \$999,073 or \$313.58 per square foot of living area, including land, which falls below the range established by the best comparable sales in this record. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported 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

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