



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

APPELLANT: John Dzurak  
DOCKET NO.: 24-37944.001-R-1  
PARCEL NO.: 24-10-421-027-0000

The parties of record before the Property Tax Appeal Board are John Dzurak, the appellant, by Glenn Guttman, attorney-at-law of Rieff Schramm Kanter & Guttman 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:** \$5,502  
**IMPR.:** \$16,498  
**TOTAL:** \$22,000

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 is improved with a two-story dwelling of frame and masonry exterior construction that contains 1,868 square feet of living area. The dwelling was constructed in 1948 and is approximately 76 years old. Features of the property include a slab foundation, central air conditioning, three bedrooms, 1½ bathrooms, and a detached one-car garage.<sup>1</sup> The property has a 7,860 square foot site located in Oak Lawn, Worth Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's counsel indicated the subject property is an owner-occupied residence and contends overvaluation as the basis of the appeal. In support of this argument the appellant

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<sup>1</sup> The appellant's appraiser described the property as having a one-car garage, which was supported by a photograph of the garage.

submitted an appraisal estimating the subject property had a market value of \$220,000 as of January 1, 2023. The appraisal was prepared by Adam F. Smith, an Illinois Certified General Real Estate Appraiser. The assignment was to estimate the retrospective fee simple market value of the property. The fee simple interest property rights were appraised. The appraiser determined the highest and best use of the property as vacant would be to develop the site with a single-family home in keeping with the character of the neighborhood. The highest and best use as improved was determined to maintain the subject as is, with consideration given to renovation to make the subject more marketable and in keeping with the neighborhood standard for finishes and condition. The appraiser reported an interior and exterior inspection of the property was conducted on February 14, 2024. The appraiser indicated the subject dwelling is in average conditioning compared to other similar homes in the neighborhood. The appraiser stated the subject home has not been recently renovated and is showing some wear and tear. The appraiser also concluded that the subject has average or typical functional utility for a property of its size, type and usage in its neighborhood. The report included photographs of the interior and exterior of the subject property. In discussing the sales history of the subject property, the appraiser stated the subject is presently leased. Additionally, in the Appraisal Scope section of the report the appraiser stated the subject is a leased, single-family home in an area in which homes are predominately occupied by ownership.

The appraiser developed the sales comparison approach to value using four comparable sales that are improved with two-story dwellings of frame or brick and frame construction that range in size from 1,350 to 1,864 square feet of living area.<sup>2</sup> The homes were built in 1947 and 1948. The appraiser described each comparable as having no basement. Each comparable has three bedrooms, and a 1-car or a 2-car detached garage. These properties also have 1, 1½ or 2 bathrooms. These properties have sites with either 6,534 or 6,550 square feet of land area. The appraiser also indicated the comparables are located in the same neighborhood as the subject and included a map in the report depicting the location of the comparables in relation to the subject property. The comparables sold from July 2021 to November 2022 for prices ranging from \$205,000 to \$230,000 or from \$123.39 to \$166.59 per square foot of living area, land included. The appraiser made no adjustments to the comparables for property rights, financing or conditions of sale. The appraiser indicated in the analysis that the comparables had similar amenities or the differences were not significant and made no adjustments to the comparables for amenities. The appraiser made 3.0% adjustments to comparables #3 and #4 for market conditions that resulted in adjusted prices for the four comparables ranging from \$205,000 to \$231,647. The appraiser made 2.0%, 5.0% and 4.0% adjustments to comparables #1, #3 and #4, respectively, for size. The appraiser adjusted each comparable 1.0% for having a smaller site than the subject. Comparables #1, #3 and #4 received -3.0% adjustments for having larger garages than the subject. Comparable #1 received a -.50% adjustment for room count. Overall, comparable #1 received a -.50% net adjustment, comparable #2 received a 1.0% net adjustment, comparable #3 received a 3.0% net adjustment, and comparable #4 received a -1.0% net adjustment. The comparables had adjusted prices ranging from \$203,975 to \$238,596. The appraiser explained that the average adjusted sales price was \$221,232 while the median adjusted sales price was \$221,179. The appraiser was of the opinion the subject had a value near the middle of the indicated range of adjusted values and estimated the property had a market value of

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<sup>2</sup> The appraisal contained photographs of the comparables depicting two-story dwellings.

\$220,000 as of January 1, 2023. The appellant requested the subject's assessment be reduced to \$22,000 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$26,000. The subject's assessment reflects a market value of \$260,000 or \$139.18 per square foot of living area, including land, when applying the level of assessment for class 2-05 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The board of review also indicated the first year of the general assessment cycle for the subject property was 2023 and no township equalization factor was applied in 2024 by Cook County assessment officials.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales composed of class 2-05, 2-07 or class 2-78 properties improved with two-story dwellings of frame and masonry exterior construction that range in size from 1,395 to 2,155 square feet of living area. The dwellings are from 54 to 76 years old. Each property has a partial or full basement with two comparables having formal recreation rooms, 1½ or 2½ bathrooms, three or four bedrooms, and a 1-car or 2-car garage. Two properties have central air conditioning, and one comparable has one fireplace. These properties have sites ranging in size from 6,600 to 7,484 square feet of land area. Three comparables have the same assessment neighborhood code as the subject property and comparable #4 is located in Evergreen Park. The sales occurred from January 2022 to December 2023 for prices ranging from \$280,000 to \$393,000 or from \$173.68 to \$200.72 per square foot of living area, including land.

In rebuttal the appellant's counsel submitted a narrative critiquing the comparable sales submitted by the board of review. Counsel indicated that when comparable sale #1 sold in 2022 it was advertised as a beautiful well maintained 4-bedroom, 2.5-bathroom tri-level home. Counsel also provided a description of the various amenities and updates the dwelling had. With respect to comparable #2 the appellant's counsel indicated that the property was advertised as a beautiful, rehabbed open floor plan solid tri-level property. He also summarized various features and renovations the property had. The appellant indicated that comparable #3 was not located in the same neighborhood code as the subject and should not be given any consideration. With respect to comparable #4 the appellant's counsel contends this property is in a superior location of Evergreen Park relative to Oak Lawn. Counsel also referenced various updates to the home that included a new furnace and air conditioning, new roof/gutters, new concrete porch and patio, new upgraded electric panel, new hot water heater and newly refinished hardwood floors, carpeting and paint.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.<sup>3</sup>

The Board finds the best evidence of market value to be the appraisal submitted by the appellant estimating the subject property had a market value of \$220,000 as of January 1, 2023. The appraiser developed the sales comparison approach to value using properties that were similar to the subject in location, age, style and most features. These properties sold from July 2021 to November 2022 for prices ranging from \$205,000 to \$230,000 or from \$123.39 to \$166.59 per square foot of living area, land included. The appraiser adjusted the comparables for differences from the subject, which were explained in the report, to arrive at adjusted prices ranging from \$203,975 to \$238,596. The appraiser explained the mean and median adjusted prices of the comparables were \$221,232 and \$221,179, respectively, which were used to support the estimated value of \$220,000. The Board finds the appraiser's analysis was credible.

The Board gives less weight to the comparables submitted by the board of review as comparables #1, #2 and #3 are significantly newer than the subject dwelling and each comparable submitted by the board of review has a basement, two with finished area, unlike the subject's slab foundation, making these properties superior to the subject. Additionally, comparable #3 has a different neighborhood code than the subject, which further detracts from the weight given this sale. Furthermore, board of review comparable #4 is approximately 25% smaller than the subject dwelling and located in a different city than the subject property, which further detracts from the weight given this sale. The Board finds the unadjusted sales presented are not as credible in establishing the correct assessment of the subject property as is the appraisal submitted by the appellant.

The subject's assessment reflects a market value of \$260,000 which is above the appraised value of \$220,000 presented by the appellant. Based on this evidence the Board finds a reduction in the subject's assessment to reflect the appraised value presented by the appellant is justified.

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<sup>3</sup> The Board takes notice that the subject property was the subject matter of an appeal before the Property Tax Appeal Board the prior 2023 tax year under Docket No. 23-55492.001-R-1, in which it issued a decision reducing the subject's assessment to \$22,000 based on the same appraisal as presented by the appellant in this appeal. The Board also finds 2023 and 2024 are within the same general assessment period and no township equalization factor was applied in 2024. However, the record in the 2024 appeal is conflicting as to whether the property is an owner-occupied dwelling so as to allow the assessment as established in the 2023 appeal to be carried forward to the 2024 tax years as provided by the so-called "rollover" provision of section 16-185 of the Property Tax Code (35 ILCS 200.16-185). Counsel indicated the property was owner-occupied, however, the appraiser described the subject as being a leased single-family dwelling. Due to the contradictory statements the Board finds that it cannot apply the "rollover" contained in section 16-185 of the Property Tax Code in this 2024 appeal.

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

AGENCY

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

APPELLANT

John Dzurak , by attorney:  
Glenn Guttman  
Rieff Schramm Kanter & Guttman  
100 North LaSalle Street  
Suite 1410  
Chicago, IL 60602

COUNTY

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