



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

APPELLANT: Tadeusz Bogdan
DOCKET NO.: 24-53473.001-R-1
PARCEL NO.: 12-24-225-022-0000

The parties of record before the Property Tax Appeal Board are Tadeusz Bogdan, 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 **No Change** 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: \$9,375
IMPR.: \$21,094
TOTAL: \$30,469

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 1.5-story dwelling of masonry exterior construction with 1,495 square feet of living area. The dwelling is approximately 98 years old. Features of the home include a full basement, two full bathrooms, and a 2-car garage. The property has a 3,750 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 regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables located within the subject's assessment neighborhood and from 0.31 to 0.77 of a mile from the subject property. The comparables are improved with class 2-03 homes of masonry exterior construction ranging in size from 1,248 to 1,650 square feet of living area. The

dwelling range in age from 57 to 75 years old. Four comparables each have a full basement and one comparable has a crawl space foundation. Each comparable has one full bathroom, four of which have one half bathroom. Four comparables each have from a 1-car to a 2-car garage. The comparables have improvement assessments ranging from \$15,525 to \$19,375 or from \$11.27 to \$12.44 per square foot of living area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment to \$16,848.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$30,469. The subject property has an improvement assessment of \$21,094 or \$14.11 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables located within the subject's assessment neighborhood and on the same block as the subject property. The comparables are improved with 1.5-story, class 2-03 homes of masonry exterior construction ranging in size from 1,152 to 1,451 square feet of living area. The homes are each 97 years old. Each home has a full basement, one full bathroom, and from a 2-car to a 3-car garage. One comparable has central air conditioning. The comparables have improvement assessments ranging from \$20,625 to \$24,625 or from \$16.41 to \$19.64 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be sustained.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains a total of eight equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables which are substantially newer homes than the subject and are located less proximate to the subject than the comparables presented by the board of review. Further, comparables #1 and #2 lack a basement foundation and garage amenity, respectively, both of which are features of the subject.

The Board finds the best evidence of assessment equity to be the board of review comparables which are located most proximate to the subject and are similar to the subject in design/class, age, and basement foundation with varying degrees of similarity in dwelling size and other features. Each comparable is a smaller home and have fewer bathrooms than the subject dwelling which would require appropriate upward adjustments for these differences to make them more equivalent to the subject. Conversely, two comparables have basement finish, unlike the subject, one comparable has central air conditioning, which the subject lacks, and two comparables have a larger garage capacity than the subject, suggesting downward adjustments would be necessary to make them more equivalent to the subject. These comparables have improvement assessments

ranging from \$20,625 to \$24,625 or from \$16.41 to \$19.64 per square foot of living area. The subject's improvement assessment of \$21,094 or \$14.11 per square foot of living area falls within the range established by the best comparables in this record on an overall improvement assessment basis and below the range on a per square foot basis. After considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed 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: _____

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

Tadeusz Bogdan, 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