



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Michael DeCarlo
DOCKET NO.: 21-53885.001-R-1
PARCEL NO.: 15-03-307-007-0000

The parties of record before the Property Tax Appeal Board are Michael DeCarlo, the appellant, by attorney Andreas Mamalakis, of the Law Offices of Andreas Mamalakis in Kenosha; 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: \$5,115
IMPR.: \$20,836
TOTAL: \$25,951

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 2021 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 6,600 square foot site improved with two dwellings: a 1-story class 2-03 dwelling with 1,025 square feet of living area and a class 2-02 dwelling with 624 square feet of living area.¹ The class 2-03 dwelling is approximately 97 years old and features a basement. The property is located in Melrose Park, Proviso 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

¹ The Board finds the best description of the subject property was found in the board of review's Notes on appeal which stated the subject is a multi-improvement property with a combined building area of 1,649 square feet, which was not refuted by the appellant.

comparables located in the same assessment neighborhood code and within 0.51 of a mile from the subject property. The comparables are improved with 1-story class 2-03 dwellings of frame exterior construction ranging in size from 1,034 to 1,190 square feet of living area. The homes range in age from 99 to 119 years old. Each comparable has a basement, 1 bathroom and one or two fireplaces. Four dwellings each have a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$10,364 to \$11,940 or from \$9.92 to \$10.09 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$10,281 or \$6.23 per square foot of living area when using the combined total area of 1,649 square feet.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$25,951. The subject property has an improvement assessment of \$20,836 or \$12.64 per square foot of living area when using the combined total area of 1,649 square feet. In support of its contention of the correct assessment the board of review submitted information on four equity comparables located in the same assessment neighborhood code and within 1/4 of a mile from the subject property. The comparables are improved with 1-story class 2-03 dwellings of masonry, stucco or frame and masonry exterior construction ranging in size from 1,016 to 1,189 square feet of living area. The homes range in age from 91 to 98 years old. Each comparable has a basement and 1 or 1½ bathrooms. Three dwellings have a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$12,709 to \$13,753 or from \$11.57 to \$13.27 per square foot of living area.

The board of review also submitted a list of documents and document dates that appear to be associated with the subject property but include no further detail. Based on this evidence, the board of review requested the subject's assessment be confirmed.

Conclusion of Law

The appellant 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 parties submitted nine class 2-03 equity comparables for the Board's consideration. The comparables have improvement assessments ranging from \$10,364 to \$13,753 or from \$9.92 to \$13.27 per square foot of building area. The subject's improvement assessment of \$20,836 or \$12.64 per square foot of combined building area falls above the range established by the comparables in this record on an overall improvement basis and within the range of the comparables on a per square foot basis. The subject's higher overall improvement assessment is logical since the subject has two dwellings relative to each comparable which reflects only one improvement. Therefore, after considering appropriate adjustments to the 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: _____

C E R T I F I C A T I O N

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:

January 20, 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

Michael DeCarlo, by attorney:
Andreas Mamalakis
Law Offices of Andreas Mamalakis
4844 89th Place
Kenosha, WI 53142

COUNTY

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