



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

APPELLANTS: Janusz & Katarzyna Rakoczy
DOCKET NO.: 22-51423.001-R-1
PARCEL NO.: 03-15-107-017-0000

The parties of record before the Property Tax Appeal Board are Janusz & Katarzyna Rakoczy, the appellants, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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: \$11,607
IMPR.: \$27,851
TOTAL: \$39,458

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 2022 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 frame and masonry exterior construction with 2,281 square feet of living area. The dwelling is approximately 45 years old. Features of the home include a full basement with finished area, central air conditioning and a 2-car garage. The property has a 14,509 square foot site and is located in Prospect Heights, Wheeling Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellants submitted information on seven comparables located within the subject's assessment neighborhood in Prospect Heights, Illinois and within 0.47 of a mile from the subject property. Four comparables are also located within the same block as the subject. The comparables consist of class 2-78, 2-story dwellings of frame or frame

and masonry exterior construction ranging in size from 2,168 to 2,980 square feet of living area. The dwellings are 34 to 62 years old. Each comparable has a partial or full basement with one having finished area, central air conditioning and either a 1-car, a 2-car or a 3-car garage. The comparables have improvement assessments ranging from \$22,511 to \$26,419 or from \$8.39 to \$11.99 per square foot of living area. Based on this evidence, the appellants requested that the improvement assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$39,459. The subject property has an improvement assessment of \$27,852 or \$12.21 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables located within the same assessment neighborhood as the subject. Comparable #1 is located in the subject's block in Prospect Heights, Illinois. The board of review indicated comparables #2, #3 and #4 are located in Mount Prospect, Illinois, but did not provide the comparables' proximity to the subject property in the grid analysis. The comparables consist of class 2-78, 2-story dwellings of frame or frame and masonry exterior construction ranging in size from 2,231 to 3,217 square feet of living area. The dwellings are 41 to 45 years old. Each comparable has a partial or full unfinished basement, central air conditioning, and a 2-car garage. The comparables have improvement assessments ranging from \$29,500 to \$44,512 or from \$13.22 to \$15.80 per square foot of living area. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

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

The parties submitted eleven equity comparables for the Board's consideration. The Board gives less weight to the appellants' comparables #3, #6 and #7 which are less similar to the subject in age and/or dwelling size than the other comparables in the record. The Board also gives less weight to the board of review's comparables #2, #3 and #4 due to their locations within a different city than the subject and/or the dwellings significantly larger dwelling sizes when compared to the subject.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables which are located within the same assessment neighborhood and city as the subject and are also relatively similar to the subject in age, dwelling size and some features. These five comparables have improvement assessments ranging from \$22,511 to \$29,500 or from \$9.62 to \$13.22 per square foot of living area. The subject's improvement assessment of \$27,852 or \$12.21 per square foot of living area falls within the range established by the best comparables in the record.

After considering adjustments to the best comparables for differences from the subject, the Board finds the appellants 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:

May 19, 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

Janusz & Katarzyna Rakoczy, by attorney:
George N. Reveliotis
Reveliotis Law, P.C.
1030 Higgins Road
Suite 101
Park Ridge, IL 60068

COUNTY

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