



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Rocco Malandrino  
DOCKET NO.: 23-33567.001-R-1  
PARCEL NO.: 02-21-406-003-0000

The parties of record before the Property Tax Appeal Board are Rocco Malandrino, the appellant, by Andreas Mamalakis, attorney-at-law of the Law Offices of Andreas Mamalakis in Kenosha, Wisconsin, 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:** \$12,205  
**IMPR.:** \$36,641  
**TOTAL:** \$48,846

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 2023 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.<sup>1</sup>

### **Findings of Fact**

The subject property is improved with a two-story dwelling of frame construction containing 3,331 square feet of living area. The dwelling is approximately 54 years old. Features of the property include a partial basement with a formal recreation room, central air conditioning, one fireplace, 3½ bathrooms, and a 2-car garage. The property has a 13,562 square foot site located in Palatine, Palatine Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-78 properties improved with two-story dwellings of frame

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<sup>1</sup> The appellant's counsel originally requested a hearing before the Property Tax Appeal Board but subsequently withdrew the request for a hearing.

exterior construction that range in size from 2,892 to 3,429 square feet of living area. The homes range in age from 47 to 54 years old. Each property has a full or partial basement, central air conditioning, one fireplace, 3½ or 4½ bathrooms and a 2-car, 2.5-car or 3-car garage. The comparables have the same assessment neighborhood code as the subject property and are located from .14 to .34 of a mile from the subject property. Their improvement assessments range from \$31,873 to \$37,719 or from \$10.35 to \$11.02 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$36,208.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$53,243. The subject property has an improvement assessment of \$41,038 or \$12.32 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables consisting of class 2-78 properties improved with two-story dwellings of frame exterior construction that range in size from 2,707 to 3,084 square feet of living area. The homes are either 46 or 53 years old. Each property has a full or partial basement with two having finished area, central air conditioning, one fireplace, two full bathrooms, one or two half bathrooms, and a two-car garage. The board of review reported the subject to be in deluxe condition, comparables #1 and #2 in deluxe condition, and comparables #3 and #4 in poor condition. These properties have the same neighborhood code as the subject and are located in the same block or ¼ of a mile from the subject property. Their improvement assessments range from \$37,547 to \$40,864 or from \$12.40 to \$14.07 per square foot of living area.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted information on nine equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparable #5 due to differences from the subject in dwelling size. The Board gives less weight to the board of comparables due to differences from the subject in size and/or condition. The Board finds the best evidence of assessment equity to be appellant's comparables #1, #2, #3 and #4 that range in size from 3,145 to 3,429 square feet of living area and in age from 47 to 54 years old. The comparables have varying degrees of similarity to the subject in features. These four comparables have improvement assessments that range from \$33,709 to \$37,719 or from \$10.35 to \$11.00 per square foot of living area. The subject's improvement assessment of \$41,038 or \$12.32 per square foot of living area falls above the range established by the best comparables in this record. Based on this record the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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.



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Chairman



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Member



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Member



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Member



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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

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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**

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