



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

APPELLANT: John Affatati
DOCKET NO.: 23-36979.001-R-1
PARCEL NO.: 03-32-405-023-0000

The parties of record before the Property Tax Appeal Board are John Affatati, the appellant, by Dora Cornelio, attorney-at-law of Schmidt Salzman & Moran, Ltd. 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: \$6,600
IMPR.: \$77,168
TOTAL: \$83,768

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.

Findings of Fact

The subject property consists of a site with 6,600 square feet of land area that is improved with a two-story dwelling of frame construction containing 2,992 square feet of living area. The dwelling is approximately 10 years old. Features of the property include a full basement with a formal recreation room, central air conditioning, one fireplace, four bathrooms, and a 2-car garage. The property is in Arlington Heights, Wheeling Township, Cook County. The subject is 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 masonry or frame and masonry exterior construction that range in size from 2,696 to 3,260 square feet of

living area. The homes are 28 to 48 years old. Each property has a full basement with a recreation room, central air conditioning, 2½ or 3½ bathrooms, and a 2-car or 2.5-car garage. Four comparables have one fireplace. These properties have the same neighborhood code as the subject. Their improvement assessments range from \$36,940 to \$46,760 or from \$13.70 to \$15.14 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$42,905.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$83,768. The subject property has an improvement assessment of \$77,168 or \$25.79 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 consisting of class 2-78 properties improved with two-story dwellings of frame construction that range in size from 2,717 to 3,179 square feet of living area and are 1 or 3 years old. Each property has a full basement with two having finished area, central air conditioning and a 2-car or 2.5-car garage. The comparables have 2½, 4½ or 5½ bathrooms. Two comparables have one fireplace. The comparables are in the "subarea" but have different neighborhood codes than the subject property. The comparables have improvement assessments ranging from \$71,023 to \$128,000 or from \$26.14 to \$40.26 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on eight equity comparables to support their respective positions. The Board finds the best evidence of assessment equity to the comparables submitted by the board of review that are more like the subject in age than are the comparables submitted by the appellant. These properties have similar features as the subject property. The board of review comparables have improvement assessments that range from \$71,023 to \$128,000 or from \$26.14 to \$40.26 per square foot of living area. The subject's improvement assessment of \$77,168 or \$25.79 per square foot of living area falls within the range of the total improvement assessments but is below the range on a per square foot of living area basis as established by the best comparables in this record. Based on this record 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: June 16, 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 Affatati, by attorney:
Michael R. O'Malley
Schmidt Salzman & Moran, Ltd.
111 West Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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