



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

APPELLANT: Joseph Rafalko
DOCKET NO.: 23-47856.001-R-1
PARCEL NO.: 13-28-321-047-0000

The parties of record before the Property Tax Appeal Board are Joseph Rafalko, the appellant(s), 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 **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: \$7,031
IMPR.: \$27,969
TOTAL: \$35,000

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 2-story, multi-family building of frame exterior construction with 3,298 square feet of gross building area. The building is approximately 59 years old. Features include a concrete slab foundation and 3 bathrooms. The property has a 4,687 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 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 comparables located within the subject's assessment neighborhood and within 0.65 of a mile from the subject. The comparables are improved with class 2-11, 2-story multi-family buildings of frame exterior construction ranging in size from 2,958 to 3,360 square feet of gross building

area. The buildings are from 61 to 115 years old. Two comparables each have a concrete slab foundation, and three comparables each have a basement. Each comparable has 2, 2½ or 3 bathrooms and a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$24,560 to \$29,375 or from \$8.04 to \$9.93 per square foot of gross building area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$41,004. The subject property has an improvement assessment of \$33,969 or \$10.30 per square foot of gross building area.

In support of its contention of the correct assessment, the board of review submitted information on four comparables located within the subject's assessment neighborhood and within the subject's subarea or approximately ¼ of a mile from the subject. The comparables are improved with class 2-11, 2-story multi-family buildings of masonry exterior construction ranging in size from 3,006 to 3,250 square feet of gross building area. The buildings are from 53 to 67 years old. Each comparable has a basement and 3 or 3½ bathrooms. Three comparables each have a 2-car garage. The comparables have improvement assessments ranging from \$31,437 to \$36,016 or from \$10.12 to \$11.48 per square foot of gross building area. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted nine suggested comparables for the Board's consideration. Eight of the comparables, excluding the appellant's comparable #3, have varying degrees of similarity to the subject in age, and foundation type. Nevertheless, the Board gives less weight to the appellant's comparables #1, #2, #4 and #5 due to their considerably older ages when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparable #3 and the board of review's comparables which are most similar to the subject in design, age, and building size. However, these comparables require downward adjustments for a basement foundation and/or a garage amenity to make them more equivalent to the subject which lacks both of these features. These five comparables have improvement assessments ranging from \$28,886 to \$36,016 or from \$8.76 to \$11.48 per square foot of gross building area. The subject's improvement assessment of \$33,969 or \$10.30 per square foot of gross building area falls within the range established by the best comparables in the record, but above the appellant's comparable #3 which is nearly identical to the subject in property characteristics, except for its

garage amenity. Based on this record and after considering the adjustments to the best similar comparables for differences from the subject, the Board finds the subject's assessment is excessive 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.



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

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