



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

APPELLANT: Joanne Nemerovski
DOCKET NO.: 21-38771.001-R-1
PARCEL NO.: 14-33-124-050-1011

The parties of record before the Property Tax Appeal Board are Joanne Nemerovski, the appellant, by attorney Robert Rosenfeld of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$5,844
IMPR.: \$21,733
TOTAL: \$27,577

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 consists of a residential condominium unit with a 3.3600% ownership interest in the common elements of the condominium property containing 36 residential units. The property has 13,915 square feet of land area and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted a condominium analysis with sales data for five comparables sales in the subject's condominium property. The appellant reported the five comparable sales each have from 1.76% to 3.43% ownership interest in the common elements of the condominium property. The comparables sold from May to September 2021 for prices ranging from \$124,400 to \$345,000. The appellant applied a personal property adjustment factor of 5% per unit. The

appellant contends the subject property has 3.36% ownership interest of ownership in the condominium property. The appellant estimated the subject property has a market value of \$268,230 and an assessment of \$26,823, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$27,577. The subject's assessment reflects a market value of \$275,770, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted a sales analyses prepared by Lilybeth Kafka, an analyst with the Cook County Board of Review. The analyst provided sales data on seven comparable sales of residential units in the subject's condominium property, which included the sales submitted by the appellant. The sales occurred from June 2018 to September 2021 for prices ranging from \$124,400 to \$345,000. The analyst reported a total consideration for these seven sales of \$1,903,400. The total consideration was divided by the percentage of interest of ownership in the condominium property for the units that sold of 22.9500% to arrive at an indicated full value for the property of \$8,293,681 and an assessment of \$829,368, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant provided a sales analysis of five comparable sales, while the board of review provided a sales analysis of seven comparables sales to support their respective positions before the Property Tax Appeal Board, where five sales are common to both parties.

The Board has given less weight to the estimated market value as indicated in the appellant's sales analysis as the appellant applied a 5% personal property adjustment factor which was deducted from the total consideration of the sales prices in the analysis but failed to provide any evidence to support the adjustment. Likewise, the Board has given less weight to the estimated market value as indicated in the board of review condominium analysis as the Board finds two sales chosen by the board of review analyst occurred in June and December 2018, which are less proximate in time to the assessment date at issue. However, the Board will analyze the five common comparable sales submitted by the parties.

The Board finds the five common comparable sales occurred more proximate to the January 1, 2021 assessment date. These properties sold from May to September 2021 for prices ranging

from \$124,400 to \$345,000. The subject's assessment reflects a market value of \$275,770, which is within the range established by the best comparable sales in the record. The Board finds these five comparable sales have a combined total ownership interest in the condominium property of 15.2500%. The Board also finds these comparables have an aggregate sale price of \$1,313,400, reflecting a total market value of \$8,612,459 for the condominium property. Applying the subject's percentage of ownership interest of 3.3600% to the total market value results in a market value for the subject of \$289,379, which is greater than the subject's estimated market value as reflected by its assessment. Based on this evidence, the Board finds 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: _____

April 15, 2025



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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