



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Joanne Nemerovski  
DOCKET NO.: 21-38772.001-R-1  
PARCEL NO.: 14-33-114-046-1017

The parties of record before the Property Tax Appeal Board (PTAB) 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, PTAB hereby finds *A Reduction* in the Cook County Board of Review's assessment of the property is justified. The correct assessed valuation of the property is:

<b>LAND:</b>	\$10,698
<b>IMPR.:</b>	\$35,802
<b>TOTAL:</b>	\$46,500

Subject only to the State multiplier as applicable.

### **Statement of Jurisdiction**

The appellant timely filed the appeal from a Cook County Board of Review decision 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 property consists of a 1,600 square feet, one-story brick residence situated on a 41,222 square feet parcel in Chicago, North Chicago Township, Cook County. The subject improvement included 2.5 bathrooms, one fireplace, and central air conditioning. The dwelling sold in August 2019 for \$465,000 in a sale advertised on a multiple listing service for months. The subject was not sold pursuant to a foreclosure action or using a contract for deed.

The appellant contends the \$52,798 subject assessment overvalues the subject property. The appellant supported the overvaluation argument with a copy of the master settlement statement indicating that the subject sold in August 2019 for \$465,000 to borrower Joanne Nemerovski. The appellant represented that the transfer was at arm's length and fairly negotiated because it was not a transfer between related parties. The appellant further represented that the property was advertised online for several months and sold in 2019 by then-owner Kefei Xu.

In its “Notes on Appeal,” the county board of review maintained that the subject was correctly assessed at \$52,798. To fortify this position, the county board of review supplied a condominium analysis calculating the estimated fair market value of the subject unit based on recent sale data. The information on comparable units indicated that \$25,744,262 was the market value for all appealed units in the condominium. After applying the subject unit’s percentage of ownership in the condominium and the 10% level of assessment for class two properties under the Cook County Real Property Assessment Classification Ordinance, the board of review concluded the correct subject assessment was \$53,448.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in the Cook County Board of Review’s 2021 assessment of the subject. When market value is a basis of a property tax 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 Property Tax Appeal Board (PTAB) finds the appellant met this burden of proof.

In this record, the appellant attached to the petition a settlement statement confirming that the subject sold in August 2019—fewer than two years before the 2021 assessment year—for \$465,000. While the county board of review submitted a condominium analysis in defense of its subject assessment, the analysis is not as persuasive an indicator of a particular unit’s market value as a sale of the instant unit within two years of the assessment date. In short, based on the proximity of the purchase date to the assessment date and the credibility of the evidence supporting the purchase price, PTAB finds that the market valued the subject property around \$465,000. PTAB accordingly finds the appellant showed overvaluation by a preponderance of the evidence and a reduction in the total subject assessment to \$46,500, commensurate with the indicated market value and the appellant’s request, is warranted.

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**

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

**APPELLANT**

Joanne Nemerovski, by attorney:  
Robert Rosenfeld  
Robert H. Rosenfeld & Associates, LLC  
40 Skokie Blvd  
Suite 150  
Northbrook, IL 60062

**COUNTY**

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