



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

APPELLANT: Rachel Nemerovski
DOCKET NO.: 21-38777.001-R-1
PARCEL NO.: 14-32-224-070-1003

The parties of record before the Property Tax Appeal Board (PTAB) are Rachel 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 warranted. The correct assessed valuation of the property is:

LAND: \$12,428
IMPR.: \$60,072
TOTAL: \$72,500

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 1,426 square feet condominium building of brick construction located in Chicago, North Chicago Township, Cook County. The 10-year-old, class two structure featured two bathrooms, air conditioning, and one garage space.

The appellant asserts overvaluation as the basis of the appeal. To demonstrate the assessment exceeded the subject's market value, the appellant submitted an appraisal that opined the market valued the subject at approximately \$720,000 as of the January 1, 2021 assessment date. The appraisal used the sales comparison approach. The appraiser relied on four sales of suggested comparables within .75 miles of the subject property for amounts ranging from \$650,000 to \$730,000, or between \$476.67 and \$512.50 per square foot of living area. The appraiser adjusted the sales prices to account for differences between the comparables and the subject. After applying the adjustments, the appraiser determined that the subject's market value was \$720,000.

The county board of review responded in its “Notes on Appeal” that the subject was correctly assessed at \$79,200. The subject’s assessment reflects a market value of \$792,000 when using the 10% Cook County Real Estate Classification Ordinance assessment level for class two properties, which equates to \$555.40 per square foot of living area. In defense of the assessment, the board of review submitted a 2022 condominium analysis calculating the estimated fair market value of the subject unit based on one sale of a unit in August 2022. The analysis indicated that the subject property owned 32% of the condominium and had a revised assessed value of \$85,463 in 2022.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessment for property tax purposes. When market value is the basis of the appeal, the appellant must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 and a reduction in the subject’s assessment is merited.

Of the parties’ submissions, the best evidence of market value resides in the appraisal submitted by the appellant. A certified appraiser attested to the appraisal’s compliance with industry standards and included detailed justifications for the adjustments, calculations, and assumptions used in the valuation based on comparable sales. By contrast, the board of review submitted a condominium analysis that extrapolated the subject’s value based on an August 2022 sale—over a year after the assessment date in question. Accordingly, PTAB finds the appellant credibly established the market valued the subject at around \$720,000 in 2021. Because the \$79,200 subject assessment reflects a market value that exceeds the value established in this record (when applying the 10% assessment level for class two properties under the Cook County Real Property Assessment Classification Ordinance), PTAB concludes an assessment reduction is warranted. Upon weighing the credibility and probativity of all evidence in the record, PTAB finds the appellant showed overvaluation by a preponderance of the evidence and that the proper subject assessment for the tax year in question is \$72,500.

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: _____

January 20, 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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