



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

APPELLANT: Joanne Nemerovski
DOCKET NO.: 21-38840.001-R-1
PARCEL NO.: 14-33-311-045-0000

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: \$9,975
IMPR.: \$33,025
TOTAL: \$43,000

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 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 two-story dwelling of masonry exterior construction with 735 square feet of living area. The dwelling is approximately 50 years old. Features of the home include a full unfinished basement, central air conditioning, 1½ bathrooms and a fireplace. The property has a 798 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-95 property, a townhome or row house up to 62 years of age, 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 information on four comparable sales that have the same assessment neighborhood code and property classification code as the subject. The comparables have sites that range in size from 544 to 910 square feet of land area. The comparables are improved with dwellings of masonry exterior construction ranging in size from 826 to 868 square feet of living

area. The dwellings are from 50 to 52 years old. The comparables each have a full basement. No data was provided by the appellant concerning finished basement area. Each comparable has central air conditioning, 1 or 1½ bathrooms and a fireplace. The appellant did not disclose whether any of the comparables have a garage. The properties sold from April 2019 to August 2021 for prices ranging from \$420,000 to \$483,000 or from \$501.04 to \$569.01 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$39,313, reflecting a market value of \$393,130 or \$534.87 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$43,000. The subject's assessment reflects a market value of \$430,000 or \$585.03 per square foot of living area, including land, 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 information on four comparable properties that have the same assessment neighborhood code and property classification code as the subject. The comparables are located approximately ¼ of a mile from the subject property, three of which are also on the same street as the subject. The board of review's comparable #1 is the same property as the appellant's comparable #4.¹ The comparables have sites that range in size from 692 to 910 square feet of land area. The comparables are improved with two-story dwellings of masonry or frame and masonry exterior construction ranging in size from 759 to 915 square feet of living area. The dwellings are 50 or 51 years old. The comparables each have a full or partial basement with finished area, central air conditioning, 1½ bathrooms and a fireplace. The properties sold from May 2019 to September 2020 for prices ranging from \$435,000 to \$470,000 or from \$483.06 to \$596.84 per square foot of living area, land included. 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 record contains seven comparable sales for the Board's consideration, as one sale was common to the parties. The Board has given less weight to the appellant's comparable #4/board of review comparable #1 and board of review comparable #3 which have sale dates that occurred in 2019, less proximate in time to the assessment date at issue than the other comparables in the record.

¹ The parties differ as to the month the common comparable sold in 2019 but both parties depict the same sale price of \$470,000 for this property.

The Board finds the appellant's comparables #1, #2 and #3, along with board of review comparables #2 and #4 sold more proximate in time to the assessment date at issue and are similar to the subject in location, dwelling size, age and some features. The comparables sold from April 2020 to August 2021 for prices ranging from \$420,000 to \$483,000 or from \$501.04 to \$596.84 per square foot of living area, including land. The subject's assessment reflects a market value of \$430,000 or \$585.03 per square foot of living area, including land, which falls within the range established by the best comparable sales in record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not warranted based on overvaluation.

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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