



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

APPELLANT: Rachel Nemerovski
DOCKET NO.: 22-49105.001-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 Jeremy 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 2022 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 of brick construction on a 3,107 square feet lot located in Chicago, North Chicago Township, Cook County. The 10-year-old, class two structure featured 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 \$600,000 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 \$73,200. The subject’s assessment reflects a market value of \$732,000 when using the 10% Cook County Real Estate Classification Ordinance assessment level for class two properties, which equates to \$513.32 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.

Conclusion of Law

The record shows that the Property Tax Appeal Board (PTAB) reduced the subject property’s improvement assessment to \$72,500 for the 2021 assessment year in docket 21-38777.001-R-1. Because the 2022 tax year falls within the same triennial assessment period as 2021 for the North Chicago Township, PTAB finds that the assessment for the 2021 tax year should be carried forward to 2022 subject only to equalization pursuant to section 16-185 of the Property Tax Code.

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) states in part:

If [PTAB] renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm’s length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which [PTAB]’s assessment is based, or unless the decision of PTAB is reversed or modified upon review.

Applying the provisions of this section, PTAB finds that it issued a decision reducing the subject’s assessment for the 2021 tax year that has, to its knowledge, not been reversed or modified upon review. In this case, PTAB notes that the subject property was an owner-occupied dwelling, that 2021 and 2022 were in the same general assessment period, and that no evidence suggests the subject was sold at less than fair cash value subsequent to PTAB’s decision for the 2021 tax year, as the county board of review identified only one recent sale in its condominium analysis—which was of a different unit, not the subject unit. For these reasons, PTAB finds that a reduction in the subject’s 2022 assessment is mandated to reflect the \$72,500 total assessment as established in PTAB’s decision for the 2021 tax year, plus the application of an equalization factor, if any.

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

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:

February 17, 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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