



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

APPELLANT: Pingping Rosen  
DOCKET NO.: 22-50012.001-R-1  
PARCEL NO.: 04-20-200-056-0000

The parties of record before the Property Tax Appeal Board are Pingping Rosen, 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, the Property Tax Appeal Board hereby finds **A Reduction** 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:** \$32,200  
**IMPR.:** \$47,800  
**TOTAL:** \$80,000

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 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 2-story dwelling of masonry exterior construction with 4,952 square feet of living area. The dwelling is approximately 23 years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace and a 3-car garage. The property has a 23,000 square foot site and is located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of the overvaluation argument, the appellant provided evidence disclosing the subject property was purchased from Jsun Real Estate LLC on February 18, 2021 for a price of \$800,000. In Section IV of the Residential Appeal petition, the appellant further disclosed the parties to the transaction were not related, the property was sold through Maria Schneider, who is an agent with Coldwell Banker

Realty, the property was advertised for sale in a multiple listing service (MLS) for an undisclosed period of time, and the sale was not due to a foreclosure action or using a contract for deed. To document the sale, the appellant submitted a printout of the master statement affirming the sale price and date of the subject property. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$80,000 to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$113,427. The subject's assessment reflects a market value of \$1,134,270 or \$229.05 per square foot of living area, land included, when using the Cook County Real Property Assessment Classification Ordinance level of assessments for class 2-03 property of 10%.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales that are located within a different city and assessment neighborhood than the subject. The comparables consist of class 2-08, 2-story dwellings of frame or masonry exterior construction ranging in size from 4,884 to 4,968 square feet of living area. The dwellings are 15 to 43 years old. Each comparable has a partial or full basement with two having finished area, central air conditioning, 1 to 4 fireplaces and from a 2-car to a 3½-car garage. The comparables have from 21,786 to 40,502 square foot sites that sold from December 2021 to May 2022 for prices that range from \$1,250,000 to \$1,655,000 or from \$254.70 to \$333.13 per square foot of living area, including land. In addition, the board of review's comparative grid analysis disclosed the subject sold in April 2021 for a sale price of \$800,000. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant presented evidence of the sale of the subject property and the board of review presented three comparable sales in support of their respective positions before the Board. The Board gives less weight to the board of review's comparables which are located within a different city and assessment neighborhood than the subject property. Furthermore, the comparables also differ from the subject in site size, age and/or basement finish.

The Board finds the best evidence of market value in the record to be the purchase of the subject property in April 2021 for a price of \$800,000 or \$161.55 per square foot of living area, including land. The appellant provided evidence demonstrating the sale had elements of an arm's length transaction asserting in Section IV of the residential appeal petition that the parties to the transaction were not related, the property was sold using a realtor, and the property had been advertised on the open market with a Multiple Listing Service, and the sale was not due to a foreclosure or contract for deed. Furthermore, the board of review's grid analysis also acknowledged the sale date and price of the subject property, and the board of review did not

present any substantive documentary evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value. Based on this record, the board finds the subject's assessment is not reflective of market value and a reduction in the subject's assessment commensurate with the appellant's request is 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: March 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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