



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

APPELLANT: Kenneth H. Rosenberg
DOCKET NO.: 24-20921.001-R-1
PARCEL NO.: 10-25-406-035-0000

The parties of record before the Property Tax Appeal Board are Kenneth H. Rosenberg, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. in Chicago; 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: \$10,313
IMPR.: \$27,687
TOTAL: \$38,000

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 2024 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 1,938 square feet of living area. The dwelling is approximately 73 years old. Features of the home include a full basement with finished area, central air conditioning and a fireplace. The property has a 4,125 square foot site and is located in Chicago, Rogers Park Township, Cook County. The subject is classified as a class 2-05 property 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 an appraisal estimating the subject property had a market value of \$380,000 as of January 1, 2024. The appraisal was prepared by Peter Soukoulis, a Certified General Real Estate Appraiser. The appraiser reported the property rights appraised were fee simple interest and the purpose of the appraisal was to assist the client for an ad valorem tax appeal. The

appraiser considered the subject property was in average with no physical, functional or external problems were observed during inspection and remains in mostly original condition with minimal updates in the last 25 years. In estimating the subject's market value, the appraiser utilized the sales comparison approach only.

In estimating the value of the subject property, the appraiser developed sales comparison approach to value utilizing five comparable sales that are located within .62 of a mile from the subject. The comparables have sites ranging in size from 3,720 to 5,190 square feet of land area and are improved with 2-story dwellings of stucco or brick exterior construction ranging in size from 1,600 to 1,966 square feet of living. The dwellings are 70 to 98 years old and have partial or full basements with finished area. The comparable have varying degrees of similarity to the subject in features. The comparables sold from May 2022 to October 2023 for prices ranging from \$325,000 to \$425,000 or from \$202.45 to \$232.42 per square foot of living area, including land. After considering adjustments to the comparable sales for differences when compared to the subject, the appraiser arrived at an estimated market value of \$380,000 as of January 1, 2024. Based on this evidence, the appellant requested a reduction in the subject property's total assessment to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$50,001. The subject's assessment reflects a market value of \$500,010 or \$258.00 per square foot of living area, including land, when applying the level of assessment of 10% for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales with the same assessment neighborhood code as the subject and located a ¼ of a mile from the subject or "subarea". The comparables have sites ranging in size from 3,690 to 3,850 square feet of land area and are improved with 2-story dwellings of masonry exterior construction that range in size from 1,388 to 2,060 square feet of living area. The dwellings are 71 to 73 years old and have full basements, two with finished area. The comparables have central air conditioning; two comparables each have one fireplace; and three comparables each have a 1-car or a 2-car garage. The comparables sold from April 2022 to August 2023 for prices ranging from \$450,000 to \$725,000 or from \$267.65 to \$351.94 per square foot of living area, land included. Based on this evidence, the board of review requested that the subject's assessment be confirmed.

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 record contains an appraisal submitted by the appellant and four comparable sales provided by the board of review to support their respective positions.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appraiser applied reasonable and logical adjustments for differences from the subject. The Board also finds the appraiser's value conclusion was not challenged by the board of review. Furthermore, three of the four unadjusted comparable sales presented by the board of review sold over 18 months prior to the January 1, 2024, assessment date and therefore, they were less likely to reflect market conditions as of that date. The Board also finds one comparable was 28% smaller in dwelling size than the subject. The subject's assessment reflects a market value of \$500,010 or \$258.00 per square foot of living area, including land, which is higher than the appraised value. Based on this record, the Board finds a reduction in the subject's assessment commensurate with 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.



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: June 16, 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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