



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

APPELLANT: David E. Lakowski
DOCKET NO.: 22-55351.001-R-1
PARCEL NO.: 04-09-104-054-0000

The parties of record before the Property Tax Appeal Board are David E. Lakowski, the appellant, by attorney Herbert B. Rosenberg, of Rock Fusco & Connelly, LLC 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 **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: \$18,000
IMPR.: \$42,152
TOTAL: \$60,152

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 multi-level dwelling of frame and masonry exterior construction with 1,530 square feet of living area. The dwelling was constructed in 1961 and is approximately 61 years old. Features of the home include a full basement, central air conditioning, a fireplace, and a two-car garage. The property has a 12,000 square foot site and is located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-34 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 \$480,000 as of January 1, 2022. The appraisal was prepared by Borys Kushnir, a certified general real estate appraiser for an ad valorem tax appeal.

In estimating the market value of the subject property, the appraiser developed the sales comparison and cost approaches. Under the cost approach, the appraiser estimated the subject had a site value of \$300,000. The appraiser estimated the replacement cost new of the improvements to be \$378,800. The appraiser estimated physical depreciation to be \$189,400 resulting in a depreciated improvement value of \$189,400. Adding the various components, the appraiser estimated the subject property had a market value of \$494,000, rounded, under the cost approach to value.

Under the sales comparison approach, the appraiser examined four comparable sales located within .51 of a mile of the subject. The comparables are improved with one-story or split-level dwellings of frame and masonry exterior construction ranging in size from 1,657 to 2,186 square feet of living area. The dwellings range in age from 54 to 63 years old. Each comparable has central air conditioning, a basement with three having finished area, and a two-car garage. Two comparables each have a fireplace. The parcels range from 10,487 to 12,900 square feet of land area. The sales occurred from July to November 2021 for prices ranging from \$420,000 to \$570,000 or from \$253.47 to \$292.51 per square foot of living area, including land. Adjustments were applied for differences between the comparables and the subject property for condition, dwelling size, bathroom count, and other features to arrive at adjusted prices ranging from \$458,000 to \$510,000. Based on this data, the appraiser arrived at a market value of \$480,000 or \$313.73 per square foot of living area, including land, as of January 1, 2022.

In reconciliation, the appraiser placed most weight on the sales comparison approach which was considered most reliable in arriving at the final opinion of \$480,000. Based on this evidence, the appellant requested reduced assessment reflective of the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$60,152. The subject's assessment reflects a market value of \$601,520 or \$393.15 per square foot of living area, land included, when using the 10% level of assessment 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, three of which are located within the subject's assessment neighborhood and within .25 of a mile of the subject. The comparables consist of one-story or multi-level class 2-03 or 2-34 dwellings of frame or frame and masonry exterior construction ranging in size from 1,058 to 1,530 square feet of living area. The dwellings range in age from 61 to 70 years old. Each dwelling has a partial basement with finished area and two-car garage. Two comparables have central air conditioning and one comparable has a fireplace. The parcels range in size from 10,278 to 13,175 square feet of land area. The comparables sold from May 2020 to November 2021 for prices ranging from \$675,000 to \$940,000 or from \$441.47 to \$888.47 per square foot of living area, including land. 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 parties submitted an appraisal and four comparable sales for the Board's consideration. The Board gives reduced weight to the value conclusion in the appraisal, which was based on two Ranch-style homes without any adjustment for design compared to the multi-level subject. Further, the appraiser made adjustments to two of the comparables for fireplaces, which appear to be erroneous based on the appraisal photographs and board of review grid which was not refuted by the appellant in rebuttal. The Board will instead examine the raw comparable sales in the record.

The Board gives less weight to appraisal comparables #1, #2, and #4, as well as board of review comparables #1, #2, and #3, which differ from the subject in design, dwelling size, and/or lack central air conditioning, a feature of the subject. Additionally, board of review comparable #2 sold less proximate to the January 1, 2022 assessment date at issue.

The Board finds the best evidence of market value to be the appraisal comparable sales #3 and board of review comparable sale #4, which are similar to the subject in age, location, design, dwelling size, and features. These most similar comparables sold for prices of \$535,000 and \$675,000 or for \$292.51 and \$441.47 per square foot of living area, including land. The subject's assessment reflects a market value of \$601,520 or \$393.15 per square foot of living area, including land, which is bracketed by the best comparable sales in this record. Based on this evidence 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 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:

September 16, 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

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