



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

APPELLANT: Michael Levin
DOCKET NO.: 23-43112.001-R-1
PARCEL NO.: 04-08-302-028-0000

The parties of record before the Property Tax Appeal Board are Michael Levin, the appellant, by attorney Jason W. Newton, of Schoenberg Finkel Beederman Bell Glazer 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: \$27,225
IMPR.: \$59,996
TOTAL: \$87,221

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 2023 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 construction with 4,084 square feet of living area¹ that is approximately 27 years old. Features of the home include 3½ baths, a full basement finished with a recreation room,² central air conditioning, 2 fireplaces, and a 3-car garage. The property has an 18,150 square foot site and is located in Northbrook, Northfield

¹ The appellants' appraiser reported a dwelling size of 4,084 square feet and the assessing officials reported a dwelling size of 4,152 square feet in the grid analysis but failed to provide a copy of the subject's property record card or any other support for the stated dwelling size. The appellant's appraiser noted this discrepancy and stated that the appraiser inspected the interior and the exterior of the subject dwelling and included a schematic diagram with measurements of the subject dwelling. Based on this evidence and the lack of supporting evidence from the board of review, the Board has accepted the appraiser's stated dwelling size.

² While the board of review reports that the subject's basement is unfinished, the appellant's appraiser who personally inspected the subject dwelling noted that the basement is finished.

Township, Cook County. The property is a class 2-08 property³ 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 a Restricted Appraisal Report estimating the subject property had a market value of \$665,000 as of January 1, 2022. The appraisal was prepared by Lilie Toshev, a Certified Residential Real Estate Appraiser. The appraiser noted that the purpose of the appraisal is to obtain a retrospective opinion of market value of fee simple interest in the subject premises utilizing the sales comparison approach to value. The appraiser further noted that the appraisal “is intended only for the use of the client.... Users of this report must clearly understand that the report may not contain supporting rationale for all of the opinions and conclusions set forth in the report.”

Utilizing only the sales comparison approach to value, the appraiser analyzed four comparable sales located from .48 of a mile to 1.04 miles from the subject property. The comparables were described as sites ranging in size from 11,135 to 31,100 square feet of land area which have been improved with 2-story dwellings of varying exterior construction. The homes range in age from 21 to 51 years old and range in size from 2,980 to 4,197 square feet of living area. Each comparable has a finished basement, central air conditioning, and a 2-car or a 3-car garage. The sales occurred from March 2020 to October 2021 for prices ranging from \$635,000 to \$700,000 or from \$158.45 to \$213.09 per square foot of living area, including land. After making adjustments to comparables for differences from the subject in site size, condition, room count, dwelling size, garage size, and/or patio/porch/deck, the appraiser estimated the comparables had adjusted sales prices ranging from \$640,200 to \$683,600 and an opinion of market value for the subject of \$665,000 as of January 1, 2022.

In selecting the comparable sales, the appraiser made the following statement in the Supplemental Addendum:

In selecting the comparable sales, the appraiser has made every effort to use the most recent, similar-style homes within the subject's immediate neighborhood.... All the comparables utilized within this appraisal represent the most similar sales available to make good with the subject property.... These comparables are believed to be the best available sales in terms of proximity, lot, age, functional utility.

Similarly, within the sales comparison portion of the report, the appraiser noted as follows: “The comparables utilized were all taken from the subject's immediate market, and were considered the best available to derive subject's valuation. The (4) closed sales used in the analysis were the best available at this time to compare to the subject property.”

Appellant’s counsel also submitted a brief analyzing the comparables utilized by the appraiser and, based on the evidence submitted, requested a reduction to the subject’s assessment to reflect the appraised value at the statutory level of assessment.

³ Two-or-more story residence, up to 62 years of age, with 3,801 to 4,999 square feet of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$87,221. The subject's assessment reflects a market value of \$872,210 or \$213.57 per square foot of living area, including land, when applying 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, with one located within ¼ of a mile from the subject and each within the same assessment neighborhood code as the subject property. The comparables were described as lots ranging in size from 12,519 to 24,033 square feet of land area which have been improved with 2-story, class 2-08 dwellings of frame, masonry, or frame and masonry exterior construction. The homes range in age from 6 to 27 years old and range in size from 3,851 to 4,410 square feet of living area. Each home has a full basement, two finished with recreation rooms. Each comparable also has central air conditioning and a 2-car, a 3-car or a 3.5-car garage. Three dwellings each have 1 fireplace. The sales occurred from October 2020 to October 2022 for prices ranging from \$1,175,018 to \$1,475,000 or from \$266.44 to \$371.44 per square foot of living area, including land.

Conclusion of Law

The appellant contends that 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 appellant submitted a Restricted Appraisal Report and the board of review submitted four comparable sales for the Board's consideration. As an initial matter, the Property Tax Appeal Board recognizes that as provided in the Uniform Standards of Professional Appraisal Practice, a Restricted Appraisal Report is for client use only. (See Advisory Opinion 11 (AO-11), *Uniform Standards of Professional Appraisal Practice*, 2002 Edition, The Appraisal Foundation, p. 146; *Uniform Standards of Professional Appraisal Practice and Advisory Opinions*, 2006 Edition, The Appraisal Foundation, p. 137. See also Standard Rule 2-2(c), *Uniform Standards of Professional Appraisal Practice*, 2002 Edition, The Appraisal Foundation, p. 27; and *Uniform Standards of Professional Appraisal Practice and Advisory Opinions*, 2006 Edition, The Appraisal Foundation, p. 28, explaining that a Restricted Use Appraisal is for client use only.) This type of report is not intended to be used by parties other than the client. In this instance the client was identified as the appellant, Michael Levin.

Second, the appraisal report states that the appraiser utilized the most recent sales of the most similar properties to the subject, yet appraisal comparables #1 and #3 sold in 2020, and comparables #2, #3, and #4 differ substantially from the subject in dwelling size. The Board finds this problematic given that more recent sales of other similar homes within the subject's neighborhood were available for comparison as demonstrated by the comparables submitted by the board of review. In other words, the appraiser's report date of November 11, 2022 means that, at minimum, three similar properties (board of review comparables #1, #2, and #3) in close

proximity to the subject and which sold within ten months of the January 1, 2023 assessment date at issue were not utilized or commented on by the appraiser.

Finally, the appraiser noted that “the report may not contain supporting rationale for all of the opinions and conclusions set forth in the report.” The Board finds that aforementioned factors undermine and detract from the credibility and reliability of the appraiser’s report in establishing the market value of the subject property as of January 1, 2023 for *ad valorem* taxation purposes. As a result, little weight is given to the opinion of value for the subject as presented in the appraisal. The Board shall, however, consider the raw comparable sales contained in the appraisal.

The record contains a total of eight comparable sales for the Board’s consideration. The Board gave less weight to appraiser’s comparables #1 and #3, along with board of review comparable #4, which are dated sales that occurred in 2020 and therefore not as likely to reflect the subject’s market value as of the January 1, 2023 assessment date at issue as the remaining comparables that sold more proximate in time to the lien date. Additionally, the Board gave less weight to the appraiser’s comparable #4 based on its significantly smaller dwelling size and older age relative to the subject dwelling. Lastly, the Board gave less weight to board of review comparable #3 due to its significantly newer age relative to the subject dwelling.

The Board finds the best evidence of market value to be the appraisal comparable #2, along with board of review comparables #1 and #2 which sold more proximate to the assessment date at issue and are most similar to the subject in location, design, age, site size, dwelling size, and features. These best comparables in the record sold from April 2021 to October 2022 for prices ranging from \$700,000 to \$1,475,000 or from \$200.29 to \$371.44 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$872,210 or \$213.57 per square foot of living area, land included, which is within the range established by the most similar comparables in this record both in terms of overall market value and on a per square foot of living area basis. Therefore, on this record, the Board finds that the appellant did not establish by a preponderance of evidence that the subject property is overvalued and thus a reduction in the subject's assessment is not 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: _____

October 21, 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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