



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

APPELLANT: Ancient Tree Golf Villas
DOCKET NO.: 19-35525.001-R-1 through 19-35525.041-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Ancient Tree Golf Villas, the appellant(s), by attorney Joanne Elliott, of Elliott & Associates, P.C. in Des Plaines; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
19-35525.001-R-1	04-08-103-025-1001	6,708	25,541	\$ 32,249
19-35525.002-R-1	04-08-103-025-1002	5,043	19,206	\$ 24,249
19-35525.003-R-1	04-08-103-025-1003	6,324	24,079	\$ 30,403
19-35525.004-R-1	04-08-103-025-1004	6,708	25,541	\$ 32,249
19-35525.005-R-1	04-08-103-025-1005	6,708	25,541	\$ 32,249
19-35525.006-R-1	04-08-103-025-1006	5,043	19,206	\$ 24,249
19-35525.007-R-1	04-08-103-025-1007	6,324	24,079	\$ 30,403
19-35525.008-R-1	04-08-103-025-1008	6,708	25,541	\$ 32,249
19-35525.009-R-1	04-08-103-025-1009	6,708	25,541	\$ 32,249
19-35525.010-R-1	04-08-103-025-1010	5,043	19,206	\$ 24,249
19-35525.011-R-1	04-08-103-025-1011	6,324	24,079	\$ 30,403
19-35525.012-R-1	04-08-103-025-1012	6,708	25,541	\$ 32,249
19-35525.013-R-1	04-08-103-025-1013	7,092	27,004	\$ 34,096
19-35525.014-R-1	04-08-103-025-1014	7,092	27,004	\$ 34,096
19-35525.015-R-1	04-08-103-025-1015	6,708	25,541	\$ 32,249
19-35525.016-R-1	04-08-103-025-1016	5,043	19,206	\$ 24,249
19-35525.017-R-1	04-08-103-025-1017	6,324	24,079	\$ 30,403
19-35525.018-R-1	04-08-103-025-1018	6,708	25,541	\$ 32,249
19-35525.019-R-1	04-08-103-025-1019	6,708	25,541	\$ 32,249
19-35525.020-R-1	04-08-103-025-1020	5,043	19,206	\$ 24,249
19-35525.021-R-1	04-08-103-025-1021	6,324	24,079	\$ 30,403
19-35525.022-R-1	04-08-103-025-1022	6,708	25,541	\$ 32,249
19-35525.023-R-1	04-08-103-025-1023	6,810	25,932	\$ 32,742
19-35525.024-R-1	04-08-103-025-1024	5,043	19,206	\$ 24,249
19-35525.025-R-1	04-08-103-025-1025	6,324	24,079	\$ 30,403

19-35525.026-R-1	04-08-103-025-1026	6,810	25,932	\$ 32,742
19-35525.027-R-1	04-08-103-025-1027	6,477	24,665	\$ 31,142
19-35525.028-R-1	04-08-103-025-1028	5,197	19,790	\$ 24,987
19-35525.029-R-1	04-08-103-025-1029	6,912	26,322	\$ 33,234
19-35525.030-R-1	04-08-103-025-1030	6,708	25,541	\$ 32,249
19-35525.031-R-1	04-08-103-025-1031	5,043	19,206	\$ 24,249
19-35525.032-R-1	04-08-103-025-1032	6,324	24,079	\$ 30,403
19-35525.033-R-1	04-08-103-025-1033	6,708	25,541	\$ 32,249
19-35525.034-R-1	04-08-103-025-1034	6,708	25,541	\$ 32,249
19-35525.035-R-1	04-08-103-025-1035	5,043	19,206	\$ 24,249
19-35525.036-R-1	04-08-103-025-1036	6,324	24,079	\$ 30,403
19-35525.037-R-1	04-08-103-025-1037	6,708	25,541	\$ 32,249
19-35525.038-R-1	04-08-103-025-1038	6,708	25,541	\$ 32,249
19-35525.039-R-1	04-08-103-025-1039	5,043	19,206	\$ 24,249
19-35525.040-R-1	04-08-103-025-1040	6,324	24,079	\$ 30,403
19-35525.041-R-1	04-08-103-025-1041	6,708	25,541	\$ 32,249

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) after receiving a decision from the Cook County Board of Review. The instant appeal challenges the assessment for tax year 2019. The Property Tax Appeal Board (the “Board”) finds that it has jurisdiction over the parties and the subject matter of this appeal.

Findings of Fact

The subject consists of 41 condominium units with a 100.00% total ownership interest in the common elements. The property is located in Northfield Township, Cook County. The subject units are all classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance. No evidence was submitted as to whether any of the subject units are owner-occupied.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a condominium analysis showing that 13 units in the subject’s building, or 32.01% of ownership in the common elements, sold between April 2016 and September 2019 for an aggregate price of \$3,994,000. This analysis included 13 of the subject units. The aggregate sale price was then divided by the percentage of ownership interest in the common elements of the units sold to arrive at a total market value for the building of \$12,477,352. Based on this evidence, the appellant requested a reduction in the subject’s assessment to \$1,180,358 after applying 2018 Illinois Department of Revenue three-year average median level of assessment for class 2 property of 9.46%.

The board of review submitted its “Board of Review Notes on Appeal” disclosing that the total assessment for the subject is \$1,277,748. The subject’s assessment reflects a market value of

\$12,777,480 when applying the 2019 statutory level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted a condominium analysis showing that 12 units in the subject's building, or 29.39% of ownership in the common elements, sold between April 2016 and April 2019 for an aggregate price of \$3,849,000. This analysis included 12 of the subject units. The aggregate sale price was then divided by the percentage of ownership interest in the common elements of the units sold to arrive at a total market value for the building of \$13,096,292.

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 proven 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 meet this burden of proof, and a reduction in the subject's assessment is warranted.

“Real property taxes . . . which are authorized by law to be assessed against and levied upon real property shall be assessed against and levied upon each unit and the owner's corresponding percentage of ownership in the common elements as a tract, and not upon the property as a whole.” 765 ILCS 605/10(a).

Initially, the Board finds that the statutory level of assessment for class 2 property found in the Cook County Real Property Assessment Classification Ordinance of 10.00% is applicable in this appeal. The appellant has provided the Board with the 2018 Illinois Department of Revenue three-year average median level of assessment for class 2 property of 9.46%. This figure is not derived from the relevant tax year for the instant appeal of 2019. Moreover, the appellant has not provided any evidence or argument to justify using the 2018 Illinois Department of Revenue three-year average median level of assessment for class 2 property. As such, the Board will use the statutory level of assessment of 10.00%. Apex Motor Fuel Co. v. Barrett, 20 Ill.2d 395, 401 (1960) (“A practical uniformity, rather than an absolute one, is the test.”) (citing Crover v. People ex rel. Hanberg, 206 Ill. 464 (1903)).

The Board finds the best evidence of market value to be the appellant's sale comparable with the PIN ending in -1038, and the sale comparables with the PINs ending in -1003, -1007, -1009, -1013, -1016, -1022, -1032, and -1039, which were submitted by both parties. In taking the aggregate sales price of the most similar sales (\$2,705,500) and dividing by the total percentage of ownership in the common elements of the units sold (21.98%), the Board finds that the subject's building has a market value of \$12,308,917. The subject's current assessment reflects a market value above the market value established by the best comparables in this record. Based on this record, the Board finds the appellant has proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment 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:

October 17, 2023



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Ancient Tree Golf Villas, by attorney:
Joanne Elliott
Elliott & Associates, P.C.
1430 Lee Street
Des Plaines, IL 60018

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602