



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

APPELLANT: Centennial Village Unit 1 Condo Assn  
DOCKET NO.: 20-41347.001-R-1 through 20-41347.048-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Centennial Village Unit 1 Condo Assn, the appellant, by attorney Timothy C. Jacobs, of Kovitz Shifrin Nesbit in Mundelein; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-41347.001-R-1	27-16-406-010-1001	4,047	14,818	\$18,865
20-41347.002-R-1	27-16-406-010-1002	4,263	15,609	\$19,872
20-41347.003-R-1	27-16-406-010-1003	4,047	14,818	\$18,865
20-41347.004-R-1	27-16-406-010-1004	4,263	15,609	\$19,872
20-41347.005-R-1	27-16-406-010-1005	4,263	15,609	\$19,872
20-41347.006-R-1	27-16-406-010-1006	4,263	15,609	\$19,872
20-41347.007-R-1	27-16-406-010-1007	4,263	15,609	\$19,872
20-41347.008-R-1	27-16-406-010-1008	4,263	15,609	\$19,872
20-41347.009-R-1	27-16-406-010-1009	4,263	15,609	\$19,872
20-41347.010-R-1	27-16-406-010-1010	4,047	14,818	\$18,865
20-41347.011-R-1	27-16-406-010-1011	4,263	15,609	\$19,872
20-41347.012-R-1	27-16-406-010-1012	4,047	14,818	\$18,865
20-41347.013-R-1	27-16-406-010-1013	4,047	14,818	\$18,865
20-41347.014-R-1	27-16-406-010-1014	4,263	15,609	\$19,872
20-41347.015-R-1	27-16-406-010-1015	4,047	14,818	\$18,865
20-41347.016-R-1	27-16-406-010-1016	4,263	15,609	\$19,872
20-41347.017-R-1	27-16-406-010-1017	4,047	14,818	\$18,865
20-41347.018-R-1	27-16-406-010-1018	4,263	15,608	\$19,871
20-41347.019-R-1	27-16-406-010-1019	4,047	14,818	\$18,865
20-41347.020-R-1	27-16-406-010-1020	4,263	15,608	\$19,871
20-41347.021-R-1	27-16-406-010-1021	4,047	14,818	\$18,865
20-41347.022-R-1	27-16-406-010-1022	4,263	15,609	\$19,872
20-41347.023-R-1	27-16-406-010-1023	4,047	14,818	\$18,865
20-41347.024-R-1	27-16-406-010-1024	4,263	15,609	\$19,872
20-41347.025-R-1	27-16-406-010-1025	4,263	15,608	\$19,871

20-41347.026-R-1	27-16-406-010-1026	4,047	14,818	\$18,865
20-41347.027-R-1	27-16-406-010-1027	4,263	15,608	\$19,871
20-41347.028-R-1	27-16-406-010-1028	4,047	14,818	\$18,865
20-41347.029-R-1	27-16-406-010-1029	4,047	14,818	\$18,865
20-41347.030-R-1	27-16-406-010-1030	4,263	15,609	\$19,872
20-41347.031-R-1	27-16-406-010-1031	4,047	14,818	\$18,865
20-41347.032-R-1	27-16-406-010-1032	4,263	15,609	\$19,872
20-41347.033-R-1	27-16-406-010-1033	4,047	14,818	\$18,865
20-41347.034-R-1	27-16-406-010-1034	4,263	15,609	\$19,872
20-41347.035-R-1	27-16-406-010-1035	4,047	14,818	\$18,865
20-41347.036-R-1	27-16-406-010-1036	4,263	15,609	\$19,872
20-41347.037-R-1	27-16-406-010-1037	4,263	15,609	\$19,872
20-41347.038-R-1	27-16-406-010-1038	4,263	15,609	\$19,872
20-41347.039-R-1	27-16-406-010-1039	4,263	15,609	\$19,872
20-41347.040-R-1	27-16-406-010-1040	4,263	15,609	\$19,872
20-41347.041-R-1	27-16-406-010-1041	4,263	15,609	\$19,872
20-41347.042-R-1	27-16-406-010-1042	4,047	14,818	\$18,865
20-41347.043-R-1	27-16-406-010-1043	4,263	15,609	\$19,872
20-41347.044-R-1	27-16-406-010-1044	4,047	14,818	\$18,865
20-41347.045-R-1	27-16-406-010-1045	4,047	14,818	\$18,865
20-41347.046-R-1	27-16-406-010-1046	4,263	15,609	\$19,872
20-41347.047-R-1	27-16-406-010-1047	4,047	14,818	\$18,865
20-41347.048-R-1	27-16-406-010-1048	4,263	15,609	\$19,872

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 2020 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 is improved with a multi-building condominium complex containing a total of forty-eight (48) residential condominium units and is approximately 26 years old. The property has a 348,374 square foot site and is located in Orland Park, Orland Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant marked “assessment equity” and “recent sale” as the bases of the appeal. However, based on the evidence from both parties consisting of sales of condominium units within the subject association with the market values of the individual units being determined based on their respective percentage interest in the condominium association, the Board finds this appeal to be an overvaluation claim. In support of this argument, the appellant submitted a

brief asserting that between January 1, 2017 and April 1, 2020, twelve (12) units were sold representing 24.9999% ownership interest in the entire condominium. To document the sales, the appellant submitted copies of Multiple Listing Service (MLS) data sheets associated with each sale along with a spreadsheet depicting the sale dates, sale amounts, and percentage of ownership of each unit sold. The spreadsheet discloses the sales prices of the units ranging from \$175,500 to \$221,000 and disclosed that ten of the twelve sales were deemed to be arm's length sales. The appellant calculated the total consideration for the 12 units to be \$2,454,300. The appellant then divided the total consideration by the 24.9999% ownership interest the units have in the condominium to arrive at a full market value for the condominium buildings of \$9,817,239. The appellant then multiplied the estimated market value of the 48 units by "the *de facto* level of assessment for residential property of 8.80%" [italics in original] based on the 2019 Illinois Department of Revenue Sales Ratio Study to arrive at a combined total assessment for the units under appeal of \$863,917.

The appellant requests that the 8.80% *de facto* level of assessment as determined by the 2019 Illinois Department of Revenue's Sales Ratio Study be applied pursuant to 86 Ill.Admin.Code 1910.50(c)(2)(A), rather than the "*de jure*" Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 property of 10% pursuant to Cook County Ordinance 08-O-51.

Based on the foregoing evidence and argument, the appellant requested a reduction in the assessment of each of the 48 condominium units based on their percentage of ownership interest in the condominium and based on the condominium total assessment of \$863,917 which reflects a market value of \$9,817,239, land included, for the condominium buildings at the 8.80% "*de facto*" level of assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing a combined assessment for the units under appeal of \$933,712. This assessment reflects a market value of \$9,337,120 when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 property of 10%, or a market value of \$10,610,364 when applying the appellant's suggested "*de facto*" level of assessment of 8.80%.

In support of its contention of the correct assessment, the board of review submitted a document entitled Condominium Analysis Results for 2020 prepared by Boetius Turek in which it considered the same 12 comparable sales utilized by the appellant to calculate the market value of the combined units of the condominium and then to calculate the value of each unit based on percentage of ownership in the common elements of the condominium. The board of review arrived at the same total consideration for the 12 condominium units of \$2,454,300. The board of review analysis indicated these 12 units had a combined 24.9999% ownership interest in the condominium. Dividing the total consideration by the percentage of ownership in the condominium resulted in a full value of the condominium building of \$9,817,239 which results in a total combined assessment for the 48 units under appeal of \$981,724 when applying the 10% Ordinance level of assessment for class 2-99 property.

In a memorandum, the board of review argued that both the appellant and the board of review correctly arrived at the same fair market value for the entire subject condominium based on an analysis of recent sales of the units within the association. In addition, the board of review

argued that the fair market value of the condominium association “is slightly above the 2020 fair market value under appeal.” Lastly, the board of review argued appellant’s request for a “*de facto*” level of assessment of 8.80% (instead of 10% pursuant to Cook County Ordinance 08-O-51) does not apply because the subject consists of more than six units which is arguably the “criteria explicitly stated in the Code,” and, the appellant failed to provide the Illinois Department of Revenue’s 3-year sales ratio studies upon which the appellant bases the claim.

In rebuttal, the appellant contended that 86 Ill.Admin.Code 1910.50(c) cannot be interpreted to only apply to properties with six units or less otherwise Property Tax Appeal Board would be unable to determine the correct assessment for appeals involving condominium associations containing more than six individual units. As to the percentage level of assessment argument, appellant’s counsel submitted in rebuttal a document entitled “Assessment Ratios 2020” which purportedly demonstrates that Cook County is assessing Class 2 properties at a median sales ratio of 8.66% and an adjusted median sales ratio of 8.01% which arguably is consistent with the appellant’s request of 8.80%.

### Conclusion of Law

The appellant contends the market values of the subject units are not accurately reflected in their assessed valuations. 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.

With respect to application of the level of assessment for Cook County reported to be 8.80% as raised by the appellant, the Board finds first that the appellant submitted a document entitled “Assessment Ratios 2020” which purportedly demonstrates that Cook County is assessing Class 2 properties at a median sales ratio of 8.66% and an adjusted median sales ratio of 8.01%. The Board finds that this document was not included with the appellant’s initial filing and therefore violates the provision of Section 1910.66(c) which states that “[r]ebuttal evidence shall not consist of new evidence such as an appraisal or newly discovered comparable properties.” (86 Ill.Admin.Code §1910.66(c). The said Rule notwithstanding, the appellant failed to provide compelling evidence, argument, or documentation to establish that utilizing statistical Illinois Department of Revenue “assessment ratios” should be applied to the subjects’ assessments rather than the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 property of 10% pursuant to Cook County Ordinance 08-O-51.

The Board finds Section 1910.50(c)(3) of the Rules of the Property Tax Appeal Board instructive:

In Cook County, for all other classes of property, [properties with more than six condominium units] when sufficient probative evidence indicating the estimate of full market value of the subject property on the relevant assessment date is presented, **the Board will consider the level of assessment applicable to the subject**

**property under the Cook County Real Property Assessment Classification Ordinance, as amended. [Emphasis added]**

86 Ill.Admin.Code §1910.50(c)(3).

Thus, for this appeal, the Board finds that Class 2 level of assessment of 10% as established by the Cook County Real Property Assessment Classification Ordinance is the only appropriate level of assessment to be considered herein. (See 86 Ill. Admin. Code Sec. 1910.50(c)(2).

As to the issue of the market value of each condominium unit on appeal, the record contains a sales analysis of 12 units within the subject condominium that were submitted by both parties.<sup>1</sup>

The Board gives less weight to the estimated market value as indicated in the appellant's sales analysis as the appellant applied an 8.8% "*de facto*" level of assessment to the total consideration of the sales prices in the analysis but failed to establish any substantive evidence to apply anything other than the level of assessment set forth in the Cook County Ordinance 08-O-51 for class 2-99 property of 10%. Likewise, the Board gives less weight to the sales of units with PINs ending in #1008, #1020, #1028, #1033, #1035, #1037, #1041 and #1043 which occurred in 2017 or 2018, dates less proximate in time to the assessment date at issue and therefore less likely to be reflective of the market values as of the assessment date than the remaining comparable sales in the record.

The Property Tax Appeal Board finds the best evidence of market value to be the 4 most recent sales submitted by the parties which includes units with PINs ending in #1001, #1002, #1027, and #1031. Each of these sales consisted of a unit within the subject condominium association and occurred from May 2019 to March 2021 for a combined total consideration of \$867,800. The combined percentage ownership interest in the condominium for these units is 8.2973% which calculates to a full value for the condominium property of \$10,458,824. ( $\$867,800 \div .082973 = \$10,458,824$ ). The subject's assessment reflects a market value of \$9,337,120 when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 property of 10% which is lower than the market value of the condominium utilizing the best comparable sales in the record and their relative percentage ownership interest in the condominium association. Consequently, based on this evidence, the Board finds a reduction in the subject's assessment is not warranted.

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<sup>1</sup> With respect to the unit ending in PIN #1002, the last sale occurred in March 2021 for a price of \$229,900 which is more proximate in time to the January 1, 2020 assessment date at issue than the older sale of this same unit in January 2018 for a price of \$193,000. As several of the comparable units sold multiple times, the Board will only consider the most recent sale of each unit as these sales would most likely be representative of the market values as of the said assessment date at issue.

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:

August 20, 2024



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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