



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

APPELLANT: Quail Hollow Condo Assn
DOCKET NO.: 20-42162.001-R-1 through 20-42162.069-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Quail Hollow 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
20-42162.001-R-1	27-14-103-100-1001	3,152	9,634	\$12,786
20-42162.002-R-1	27-14-103-100-1002	3,151	9,633	\$12,784
20-42162.003-R-1	27-14-103-100-1003	2,666	8,151	\$10,817
20-42162.004-R-1	27-14-103-100-1004	2,666	8,151	\$10,817
20-42162.005-R-1	27-14-103-100-1005	2,666	8,149	\$10,815
20-42162.006-R-1	27-14-103-100-1006	2,666	8,149	\$10,815
20-42162.007-R-1	27-14-103-100-1007	3,151	9,631	\$12,782
20-42162.008-R-1	27-14-103-100-1008	3,152	9,631	\$12,783
20-42162.009-R-1	27-14-103-100-1009	2,666	8,149	\$10,815
20-42162.010-R-1	27-14-103-100-1010	2,666	8,149	\$10,815
20-42162.011-R-1	27-14-103-100-1011	2,666	8,149	\$10,815
20-42162.012-R-1	27-14-103-100-1012	2,666	8,149	\$10,815
20-42162.013-R-1	27-14-103-100-1013	166	508	\$674
20-42162.014-R-1	27-14-103-100-1014	166	508	\$674
20-42162.015-R-1	27-14-103-100-1015	166	508	\$674
20-42162.016-R-1	27-14-103-100-1016	166	508	\$674
20-42162.017-R-1	27-14-103-100-1017	166	508	\$674
20-42162.018-R-1	27-14-103-100-1018	166	508	\$674
20-42162.019-R-1	27-14-103-100-1019	166	508	\$674
20-42162.020-R-1	27-14-103-100-1020	166	508	\$674
20-42162.021-R-1	27-14-103-100-1021	166	508	\$674
20-42162.022-R-1	27-14-103-100-1022	166	508	\$674
20-42162.023-R-1	27-14-103-100-1023	2,666	8,149	\$10,815
20-42162.024-R-1	27-14-103-100-1024	2,666	8,149	\$10,815
20-42162.025-R-1	27-14-103-100-1025	2,666	8,149	\$10,815

20-42162.026-R-1	27-14-103-100-1026	2,666	8,149	\$10,815
20-42162.027-R-1	27-14-103-100-1027	2,666	8,149	\$10,815
20-42162.028-R-1	27-14-103-100-1029	3,152	9,631	\$12,783
20-42162.029-R-1	27-14-103-100-1030	3,152	9,631	\$12,783
20-42162.030-R-1	27-14-103-100-1031	2,666	8,149	\$10,815
20-42162.031-R-1	27-14-103-100-1032	2,666	8,149	\$10,815
20-42162.032-R-1	27-14-103-100-1033	2,666	8,149	\$10,815
20-42162.033-R-1	27-14-103-100-1034	2,666	8,149	\$10,815
20-42162.034-R-1	27-14-103-100-1035	166	508	\$674
20-42162.035-R-1	27-14-103-100-1036	166	508	\$674
20-42162.036-R-1	27-14-103-100-1037	166	508	\$674
20-42162.037-R-1	27-14-103-100-1038	164	508	\$672
20-42162.038-R-1	27-14-103-100-1039	166	508	\$674
20-42162.039-R-1	27-14-103-100-1040	166	508	\$674
20-42162.040-R-1	27-14-103-100-1041	166	508	\$674
20-42162.041-R-1	27-14-103-100-1042	166	508	\$674
20-42162.042-R-1	27-14-103-100-1043	166	508	\$674
20-42162.043-R-1	27-14-103-100-1044	2,666	8,149	\$10,815
20-42162.044-R-1	27-14-103-100-1045	2,666	8,149	\$10,815
20-42162.045-R-1	27-14-103-100-1046	2,666	8,149	\$10,815
20-42162.046-R-1	27-14-103-100-1047	2,666	8,149	\$10,815
20-42162.047-R-1	27-14-103-100-1048	2,666	8,149	\$10,815
20-42162.048-R-1	27-14-103-100-1049	2,666	8,149	\$10,815
20-42162.049-R-1	27-14-103-100-1050	2,666	8,149	\$10,815
20-42162.050-R-1	27-14-103-100-1051	2,666	8,149	\$10,815
20-42162.051-R-1	27-14-103-100-1052	2,666	8,149	\$10,815
20-42162.052-R-1	27-14-103-100-1053	2,666	8,149	\$10,815
20-42162.053-R-1	27-14-103-100-1054	2,666	8,149	\$10,815
20-42162.054-R-1	27-14-103-100-1055	2,666	8,149	\$10,815
20-42162.055-R-1	27-14-103-100-1056	2,666	8,149	\$10,815
20-42162.056-R-1	27-14-103-100-1057	2,666	8,149	\$10,815
20-42162.057-R-1	27-14-103-100-1058	2,666	8,149	\$10,815
20-42162.058-R-1	27-14-103-100-1059	2,666	8,149	\$10,815
20-42162.059-R-1	27-14-103-100-1060	2,666	8,149	\$10,815
20-42162.060-R-1	27-14-103-100-1061	2,666	8,149	\$10,815
20-42162.061-R-1	27-14-103-100-1062	166	508	\$674
20-42162.062-R-1	27-14-103-100-1063	166	508	\$674
20-42162.063-R-1	27-14-103-100-1064	166	508	\$674
20-42162.064-R-1	27-14-103-100-1065	166	508	\$674
20-42162.065-R-1	27-14-103-100-1066	166	508	\$674
20-42162.066-R-1	27-14-103-100-1067	166	508	\$674
20-42162.067-R-1	27-14-103-100-1068	166	508	\$674
20-42162.068-R-1	27-14-103-100-1069	166	508	\$674
20-42162.069-R-1	27-14-103-100-1070	166	508	\$674

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 containing a total of sixty-nine (69) parcels including forty-one (41) residential condominium units and twenty-eight (28) parking spaces.¹ The buildings are approximately 39 years old. The property has a 217,423 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 contends both overvaluation and lack of assessment equity as the bases of the appeal. In support of the overvaluation component of the appeal, the appellant submitted information on 13 comparable sales of residential condominium units and/or parking spaces located in the subject's condominium where 11 sales were reported to be arm's-length transactions and two sales were reported to be a foreclosure and a short sale. The sales occurred from August 2017 to November 2019. The sold parcels were reported to have a combined 30.106% ownership interest in the condominium. The appellant calculated the total consideration for the 13 sales to be \$1,392,501 which includes adjustments for personal property to the two units that sold following a foreclosure and the short sale. The appellant then divided the total consideration by the 30.106% combined ownership interest the units have in the condominium to arrive at a reported full market value for the condominium buildings of \$4,625,286.² The appellant then multiplied the market value of the total 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 requested combined total assessment for the parcels under appeal of \$397,949. To document the sales, the appellant submitted a spreadsheet summarizing the sales depicting the corresponding percentage of ownership and the purchase date along with copies of Multiple Listing Service (MLS) data sheets associated with each sale. The spreadsheet discloses the sales prices of the units ranging from \$83,000 to \$135,000 and disclosed that all but two sales were deemed to be arm's length sales.

As to the lack of equity argument, 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 rather than the "*de jure*" Cook County Real Property Assessment Classification

¹ Both the appellant's petition and the final decision of the Cook County Board of Review disclose parcel numbers ending with #1001 through #1070. However, as parcel ending in #1028 is missing from both lists, there are a total of 69 (not 70) total units comprising the subject property on appeal which includes both residential units and parking spaces.

² The correct calculation of the market value for the condominium is \$4,625,296 (\$1,392,501 divided by 30.1062% equals \$4,625,296).

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 combined reduction in the assessment of the subject forty-one (41) residential condominium units and twenty-eight (28) parking spaces of \$397,949 to reflect appellant's calculated market value of \$4,625,286 for the entire condominium at the 8.80% "*de facto*" level of assessment.

The board of review submitted its "Board of Review Notes on Appeal" but disclosed the assessment of only one unit out of a total of 69 parcels under appeal. However, the final decision of the Cook County Board of Review included with the appellant's submission disclosing a combined assessment for all parcels under appeal of \$474,100.³ This assessment reflects a market value of \$4,741,000 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 \$5,387,500 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 Lilybeth Kafka in which it used 21 comparable sales to estimate the value of the condominium under appeal or the combined parcels. The board of review arrived at a total consideration for the 21 condominium units and parking spaces of \$1,459,893. The board of review analysis indicated these 21 units and parking spaces had a combined 30.1062% 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 \$4,849,144 which results in a total combined assessment for the entire condominium of \$484,914 when applying the 10% Ordinance level of assessment for class 2-99 property.

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.

Initially, as to the appellant's argument for the application of the requested level of assessment of 8.80%, Section 1910.50(c)(3) of the Rules or the Property Tax Appeal Board is instructive on this issue:

In Cook County, for all other classes of property, [properties with more than six condominium units] when sufficient probative

³ The Board is cognizant of the document entitled "Condominium Analysis Results for 2020" that is part of the board of review submission that discloses the combined total assessment for the entire condominium of \$516,216. The Board finds the best evidence of the total assessment of the parcels under appeal is the final decision of the Cook County Board of Review included with the appellant's submission disclosing a combined assessment for all parcels under appeal of \$474,100 which is also consistent with the appellant's disclosure in the brief.

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).

As the appellant failed to establish by 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%, the Board gives no weight to the appellant's argument for the application of the 8.80% "*de facto*" level of assessment. Consequently, the Board gives no 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. Likewise, the Board gives less weight to the estimated market value as indicated in the board of review condominium analysis as the Property Tax Appeal Board finds 14 of the 21 sales chosen by the board of review analyst either occurred prior to 2019 which are less proximate in time to the January 1, 2020 assessment date at issue and thus less likely to be indicative of market value as of that date, or sold in 2019 for \$1 which does not represent fair cash value. Finally, the Board gives less weight to appellant's two sales that were either a foreclosure sale or a short sale and thus not as likely to represent fair cash value as the most recent arm's-length sales in the record.

The record contains a sales analysis of a total of 21 comparable sales submitted by the parties, including 19 sales which were common sales, where each sale included a residential condominium unit and/or a garage. The Property Tax Appeal Board finds the best evidence of market value to be the 7 most recent sales that sold in 2019 consisting of condominium units and/or garage spaces and which are common sales provided by both parties. These sales occurred from March to November 2019 for a total consideration of \$526,897. The Board calculated the sales prices of these best condominium sales provided by the parties and determined a combined percentage ownership interest in the condominium for these units that sold of 9.3384%. This calculates to a full value for the condominium property of \$5,642,262 ($\$526,897 \div 9.3384\% = \$5,642,262$), which is greater than the subject's estimated market value as reflected by its assessment of \$4,741,000. Consequently, based on this evidence, the Board finds 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: June 18, 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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