FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: IVIR Properties, LLC
DOCKET NO.: 21-29011.001-R-1
PARCEL NO.: 29-14-134-035-0000

The parties of record before the Property Tax Appeal Board are IVIR Properties, LLC, the appellant(s), by attorney Nora Devine, of The Devine Law Group, 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:	$2,400
IMPR.:	$8,262
TOTAL:	$10,662

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 2021 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 one unit of an approximately 61-year-old, multi-level building of frame and masonry construction with 1,062 square feet of living area. Features of the property include central air conditioning, partial basement, and a 1.5-car garage. The property is located in Dolton, Thornton Township, Cook County. The subject is classified as a Class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was sold on March 10, 2021 for a price of $85,500. The appellant submitted into evidence copies of a warranty deed and a settlement statement. Section IV Recent Sale Data of the appeal form confirmed: the sale date and price; the transfer was not between family or related corporations and was sold by owner; the subject was advertised on the Multiple Listing Service for 186 days before the sale; and the subject was not sold due to a foreclosure action. Additionally, the appellant submitted a Listing & Property History Report of the subject property. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect 10% of the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $10,662. The subject's assessment reflects a market value of $106,620, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. The board of review argues that this is a bad sale due to no commissions or tax re-proration agreement. In support of its contention of the correct assessment, the board of review submitted sales information on four suggested comparable properties with varying degrees of similarities to the subject.

In rebuttal, the appellant submitted Multiple Listing Service closing data sheets which included the sales information for the board of review's four suggested comparable properties.

On November 20, 2025, prior to the scheduled hearing date, the parties agreed to waive their right to a hearing and for the Board to render its decision on the evidence.

Conclusion of Law

When market value is a basis of the appeal, the taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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's task in this case is to determine the correct assessment of the subject property. *See* 35 ILCS 200/16-180. Under Illinois law, real property must be valued at its fair cash value, meaning the price that would be paid for it at a fair, voluntary sale where the buyer and seller are both ready, willing, and able to buy and sell, but neither is compelled to do so. Bd of Educ of Meridian Community School Dist. No. 223 v. Ill. Property Tax Appeal Bd., 2011 IL App (2d) 100068, ¶ 36. A contemporaneous sale of the subject property between parties dealing at arms-length is practically conclusive on the issue of whether an assessment reflected the fair cash market value of the property. Gateway-Walden LLC v. Pappas, 2018 IL App (1st) 162714, ¶ 33. The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment on this basis is not warranted.

The appellant presented evidence that the subject property was sold on March 10, 2021 for a price of $85,500. The appellant filled out Section IV - Recent Sale Data of the PTAB residential appeal form and disclosed information for the sale of the subject that would be indicative of an arms-length transaction. However, the Board finds that this sale is not an arm's-length transaction.

On the appellant's appeal Section IV, the appellant disclosed that the property was advertised through Multiple Listing Service (MLS) for sale for 186 days. However, the Board finds that the subject property was not listed on the open market *at the time* of the purchase. The evidence submitted by the appellant discloses that the subject was initially listed but the listing was cancelled and taken off MLS on 9/18/2020, which is almost six months before the date of the sale.

In further support of this decision, the subject property's listing on MLS had a purchase price of $129,999 but the actual sale price was significantly less at $85,000. The appellant did not submit evidence regarding negotiations between the parties or a real estate contract regarding the terms of the purchase agreement for the Board to consider.

The Board finds that, despite the sale information disclosed by the appellant in Section IV of the PTAB appeal form, the sale of the subject property was not an arms-length transaction and does not reflect the fair market value. Therefore, the Board finds a reduction 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: ____________ ____________

C E R T I F I C A T I O N

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: February 17, 2026

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

IVIR Properties, LLC, by attorney:
Nora Devine
The Devine Law Group, LLC
53 West Jackson Blvd
Suite 626
Chicago, IL 60604

COUNTY

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