FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Royalty Autos Inc.
DOCKET NO.: 23-32432.001-R-1
PARCEL NO.: 30-20-309-015-0000

The parties of record before the Property Tax Appeal Board are Royalty Autos Inc., the appellant(s), by attorney Max E. Callahan, of Siegel & Callahan, P.C. 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:	$1,789
IMPR.:	$7,974
TOTAL:	$9,763

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 two-story dwelling of masonry construction with 1,120 square feet of living area. The dwelling was 75 years old. Features of the home include a full basement, central air conditioning, and a two-car garage. The property has a 4,211 square foot site and is located in Calumet City, Thornton Township, Cook County. The subject is classified as a class 2-05 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 purchased on October 13, 2022, for a price of $65,000. Appellant submitted Section IV – Recent Sale Data of the Residential Appeal form asserting that the property was not transferred between family members or related corporations, was sold by owner, was not advertised for sale, and was not sold due to a foreclosure action or by using a contract for deed. Appellant submitted a settlement statement and a warranty deed. Appellant disclosed that this is not an owner-occupied residence. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $9,763. The subject's assessment reflects a market value of $97,630 or $87.17 per square foot of living area, land included, when using the level of assessments for class 2 property of 10% 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 properties which sold from May 2021 to September 2022 for sales prices from $101,000 to $165,000 or from $92.24 to $147.32 per square foot of living area, land included. These properties were located in the same subarea as the subject, were 73 or 75 years old, and had 1,095 or 1,120 square feet of living area. Based on this evidence the board of review requested confirmation of the subject's assessment.

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.

The Board gives little weight to the 2022 sale of the subject as it is unclear whether the sale was of an arms-length nature. The appellant indicated in Section IV of the residential appeal form that the subject property had not been advertised for sale, only relating that it was sold "by owner." There is no conclusive evidence submitted by the appellant that disclosed if, or for how long, the property was exposed to the open market.

Illinois law requires that all real property "shall be valued at its fair cash value, estimated at the price it would bring at a fair voluntary sale." (Ill. Rev. Stat. 1971, ch. 120, par. 501.) Fair cash value is normally associated with fair market value: what the property would bring at a voluntary sale where the owner is ready, willing and able to sell but not compelled to do so and the buyer is likewise ready, willing and able to buy, but not forced to do so. (See, e.g., People ex rel. McGaughey v. Wilson (1937), 367 Ill. 494, 12 N.E.2d 5.) This is theoretically an objective standard of valuation; the value of particular property is set by the forces of the marketplace at a given place and time. The Property Tax Appeal Board finds that the absence of open-market exposure undermines a fundamental requirement for establishing an arm's-length transaction reflective of fair cash value.

The appellant bears the burden of proving, by a preponderance of the evidence, that the assessed valuation of the subject property does not accurately reflect its market value. The appellant failed to demonstrate that the reported sale of the subject property constituted an arm's length transaction and provided no evidence indicating that the property was advertised or exposed to the open market for any period of time. In the absence of such evidence, the Board cannot conclude that the sale occurred between a willing buyer and a willing seller under conditions indicative of fair market value. Accordingly, the Board accords minimal weight to the reported sale. Based on the record, the Board finds that the subject's assessed valuation is reflective of its market value, and a reduction in the assessment is not warranted.

Because the appellant did not satisfy the threshold burden of establishing overvaluation, the Board is not required to undertake a substantive analysis of the board of review's evidence. When the appellant fails to meet its burden, the Board need not consider or weigh the opposing market value evidence, as the appeal necessarily fails on the insufficiency of the appellant's own proof.

Based on the record, the Board finds that the subject's assessed valuation is reflective of its market value, and a reduction in the 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:

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: July 21, 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

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