FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: 3330 Ridge, LLC
DOCKET NO.: 24-52226.001-R-1
PARCEL NO.: 30-32-117-060-0000

The parties of record before the Property Tax Appeal Board are 3330 Ridge, LLC, the appellant(s), by attorney William I. Sandrick, of Sandrick Law Firm, LLC in Homewood; 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:	$2,550
IMPR.:	$16,350
TOTAL:	$18,900

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 2024 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 mixed-use building with a first-floor commercial space and apartments on the second floor. The building is of masonry construction with 6,000 square feet of building area. The building was approximately 52 years old. The property has a 6,000 square foot site and is located in Lansing, Thornton Township, Cook County. The subject is classified as a class 2-12 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation in the assessment process. In support of this argument the appellant submitted evidence disclosing the subject property and its neighboring property were purchased on December 19, 2022, for a price of $210,000, which would reflect an allocated purchase price for the subject property of $105,000 or $17.50 per square foot of building area, land included. The 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 a trust, was not advertised for sale, was not sold due to a foreclosure action, but was sold suing a contract for deed. The appellant also submitted a settlement statement and a sales contract. Appellant asserted that the purchase of this property was not an arm's-length transaction. 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 $18,900. The subject's assessment reflects a market value of $189,000 or $31.50 per square foot of building 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 April 2022 to March 2024 for sales prices from $105,000 to $274,482 or from $26.30 to $63.63 per square foot of living area, land included in the sales process. One of these properties was on the same block as the subject, two were in the same subarea, and one had no proximity provided by the board of review. These properties were from 68 to 123 years old and had from 3,418 to 7,474 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 property because the record does not establish that the transaction was arm's length. The appellant reported in Section IV of the residential appeal form that the property had not been advertised for sale. Further, the appellant asserts that this was not an arm's-length transaction. Advertising and exposure to the open market are fundamental indicators of an arm's length transaction, as they demonstrate that a property has been made available to potential buyers under competitive market conditions. When a property is not advertised, there is no evidence of such exposure, creating significant uncertainty as to whether the sale price reflects fair cash value. Although the absence of advertising does not, by itself, prove that the transaction was non-arm's-length, it removes a critical factor necessary to evaluate the nature of the sale. The appellant provided no documentation showing that the property was offered to the public in any manner or for any duration. Accordingly, the 2022 sale cannot be relied upon as a credible indicator of the subject property's fair cash value.

Illinois law requires real property to be valued at its fair cash value, defined as the price the property would bring at a fair voluntary sale. This standard contemplates a transaction between a willing buyer and a willing seller, each under no compulsion to act, and with the property exposed to the market. People ex rel. McGaughey v. Wilson, 367 Ill. 494, 12 N.E.2d 5 (1937). The lack of any demonstrated market exposure in this case fails to satisfy this fundamental element.

The appellant bears the burden of proving by a preponderance of the evidence that the subject property is overvalued. 86 Ill. Admin. Code §1910.63(b). The appellant did not establish that the 2022 sale was an arm's length transaction and submitted no evidence showing that the property was advertised or otherwise exposed on the open market. Without such information, the Board cannot determine whether the sale involved a willing buyer and willing seller operating under typical market conditions. The Board therefore finds the appellant's evidence insufficient to rebut the correctness of the assessment.

Additionally, the Board may consider market value evidence, including comparable sales, to determine whether a recent sale reflects fair cash value. 86 Ill. Admin. Code §1910.65(c)(4); Calumet Transfer LLC v. Illinois Property Tax Appeal Board, 401 Ill. App. 3d 652 (1st Dist. 2010). The appellant submitted no such market evidence. As the appellant failed to present evidence demonstrating overvaluation by a preponderance of the evidence, the Board finds the appellant has not met the burden of proof, and the assessment is affirmed.

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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