



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

APPELLANT: Rebecca Woll
DOCKET NO.: 23-46079.001-R-1
PARCEL NO.: 15-02-327-019-0000

The parties of record before the Property Tax Appeal Board are Rebecca Woll, the appellant, by Christopher G. Walsh, Jr., attorney-at-law of Walsh Law, 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 **A Reduction** 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: \$4,300
IMPR.: \$13,700
TOTAL: \$18,000

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 is improved with a two-story dwelling of frame construction containing 1,964 square feet of living area. The dwelling is approximately 155 years old. Features of the property include one full bathroom, two half bathrooms and a 2-car garage.¹ The property has a 7,819 square foot site located in Maywood, Proviso Township, Cook County. The subject is a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on January 12, 2024, for a price of \$180,000. The appellant identified the seller as the Woll Family Trust and the

¹ Both the appellant and the board of review describe the subject dwelling as having a crawl space foundation; however, a copy of the listing associated with the sale of the subject property describes the home as having an unfinished full walkout basement.

closing statement identified the purchaser as Fabian Flores. The appellant indicated the parties to the transaction were not family members, the property sold through a realtor, and the property was advertised for sale in the Multiple Listing Service (MLS). The appellant also indicated the property was not sold due to a foreclosure. To document the purchase the appellant submitted a copy of the settlement statement dated January 12, 2024. The settlement statement disclosed the purchase price of \$180,000 and the payment real estate commissions to two realtors totaling \$11,295. 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 \$22,999. The subject's assessment reflects a market value of \$229,990 or \$117.10 per square foot of living area, including land, 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 composed of class 2-05 properties improved with two-story dwellings of frame or frame and masonry exterior construction that range in size from 1,790 to 2,064 square feet of living area. The homes are 97 to 133 years old. Each comparable has a full basement with one having finished area and 1½ or 2½ bathrooms. Two comparables have central air conditioning. Three comparables have one fireplace. Two comparables have either a 2-car or 2½-car garage. These properties have sites ranging in size from 3,515 to 10,536 square feet of land area. The comparables have the same neighborhood code as the subject and are located ¼ of a mile from the subject property. The comparables sold from December 2020 to July 2023 for prices ranging from \$285,000 to \$289,900 or from \$139.53 to \$161.60 per square foot of living area, land included.

The board of review also submitted a copy of the listing associated with the sale of the subject property. The listing disclosed the subject was listed on October 31, 2023, for a price of \$195,000; the contract to purchase the subject was entered on November 18, 2023; and the property closed on January 12, 2024, for a price of \$180,000. The board of review indicated the listing stated the subject sold "as-is" and in need of updates. The board of review also argued, "the sale closed in January of 2024 and is ineligible to be granted for a 2023 docket."

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the purchase of the subject property that closed on January 12, 2024, for a price of \$180,000. The Illinois Supreme Court held that a contemporaneous sale between parties dealing at arm's length is not only relevant to the question of fair cash value but is practically conclusive on the issue of whether an assessment is reflective

of market value. *Korzen v. Belt Railway Co. of Chicago*, 37 Ill. 2d 158, 161, 226 N.E.2d 265, 267 (Ill. 1967).

The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a realtor, and the property had been advertised on the open market with the MLS. In further support of the transaction the appellant submitted a copy of the settlement statement disclosing the purchase price and the payment of commissions to the realtors involved in the transaction. The board of review also submitted a copy of the listing of the subject property disclosing the property was listed for sale on October 31, 2023, and the contract to purchase the property was entered on November 18, 2023. The Board finds the purchase price of \$180,000 is below the market value reflected by the assessment of \$229,990. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value.

The board of review contends the January 2024 sale is not eligible to be used for a 2023 appeal but provided no authority for this proposition. The Board finds the board of review's argument regarding the date of the sale goes to the weight given the evidence not the admissibility of the evidence. The record disclosed the property was listed in October 2023 and a contract was entered in November 2023, both within the assessment year at issue, lending credence to the validity of the sale in establishing the correct assessment of the subject property.

The Board finds the comparable sales submitted by the board of review do not disprove or rebut the arm's length sale presented by the appellant in establishing the market value of the subject property for assessment purposes.

Based on this record the Board finds the subject property had a market value of \$180,000 as of the assessment date at issue and a reduction in the subject's assessment is justified.

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:

April 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

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