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

APPELLANT: Eric Wolforth
DOCKET NO.: 24-32620.001-R-1
PARCEL NO.: 14-08-112-027-0000

The parties of record before the Property Tax Appeal Board are Eric Wolforth, the appellant(s), by attorney Michael R. O'Malley, of Schmidt Salzman & Moran, Ltd. 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:** | $42,835 |
| **IMPR.:** | $69,165 |
| **TOTAL:** | $112,000 |

Subject only to the State multiplier as applicable.

## Statement of Jurisdiction

The appellant filed a timely 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 is improved with a 119-year-old, two-story building of frame construction. It contains 2,285 square feet of building area. Features of the subject include a full finished basement, central air conditioning, and one fireplace. The property is situated on 4,305 square feet of land in Lake View Township, Cook County. It is a Class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity as the bases of the appeal. In support of the overvaluation argument, the appellant submitted a settlement statement that disclosed the subject was sold on July 20, 2022, for $875,000. The subject's sale price reflects a market value of $382.93 per square foot of building area including land. The appellant also

submitted a real estate contract. Neither the settlement statement nor the contract disclosed any information about the existence or involvement of a real estate agent. The settlement statement did not have a line item for an agent, the contract did not refer to an agent, and the agent's signature line was vacant. The appellant provided information in Section IV–Recent Sale Data of the Residential Appeal that the subject was not transferred between related parties; was advertised for an unknown period of time and sold by a real estate agent of an unknown firm; was not sold due to a foreclosure. In support of the assessment inequity argument, the appellant submitted information on five suggested equity comparable properties.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment of $112,000 for the subject property. The subject property has an improvement assessment of $69,165, or $30.27 per square foot of living area. The subject's assessment reflects a market value of $1,120,000, or $490.15 per square foot of living area including land, when applying the 2024 level of assessment of 10.00% for Class 2 property 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 suggested equity comparable properties and on four suggested sale comparable properties.

## 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 subject's sale. The transaction did not have the elements of an arm's-length transaction as there was no evidence the property was advertised or exposed on the open market. The appellant merely stated in Section IV that the subject was advertised and sold by a realtor but did not provide evidence. There was no information of the length of time it was on the open market. Moreover, the documentary evidence submitted by the appellant, the settlement statement and contract, did not disclose any information about the existence and involvement of a real estate agent. The real estate contract disclosed, at best, a negotiation among parties without the involvement of a real estate agent. A contract is not evidence of a closed sale. Accordingly, the Board cannot conclude that the sale was at arm's-length for fair cash value resulting from exposure to the open, competitive market.

The Board finds the best evidence of market value in the record to be sale comparable properties #3 and #4 submitted by the board of review. These comparable properties were similar with the subject in location, style, construction, features, age, living area and land area. These properties also sold proximately in time to the assessment date at issue. The comparable properties sold for prices ranging from $498.03 to $746.58 per square foot of living area, including land. The subject's assessment reflects a market value of $490.15 per square foot of living area, including land, which is below the range established by the best comparable sales in this record.

The appellant also contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. *86 Ill.Admin.Code §1910.63(e)*. Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question and recommended not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparable properties to the subject property. *86 Ill.Admin.Code §1910.65(b)*. 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 finds the best evidence of assessment equity to be the appellant's comparable(s) #1 and #2, and the board of review's comparable(s) #3 and #4. These comparable properties had improvement assessments that ranged from $26.23 to $33.94 per square foot of gross building area. The subject's improvement assessment of $30.27 per square foot of gross building area is within the range established by the best comparable properties in this record. Based on this record, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and holds that a reduction in the subject's assessment based on assessment inequity is not 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:

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: October 20, 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 9-215 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

Eric Wolforth, by attorney:
Michael R. O'Malley
Schmidt Salzman & Moran, Ltd.
111 West Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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