



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

APPELLANT: Josphine Pangilinan  
DOCKET NO.: 21-39857.001-R-1  
PARCEL NO.: 17-04-110-048-1004

The parties of record before the Property Tax Appeal Board are Josphine Pangilinan, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, 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 **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:** \$10,397  
**IMPR.:** \$29,663  
**TOTAL:** \$40,060

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 a 3-bedroom/2-bathroom condominium unit with 1,682 square feet of living area. The unit is located on the fourth floor of a 4-story building of brick exterior construction that is approximately 19 years old. The subject has a 26.8300% interest in the common elements of the condominium. Features of the subject include central air conditioning and a 1-car garage space. The property has a 3,100 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-99 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 an appraisal estimating the subject property had a market value of \$350,000 as of January 1, 2021. The appraisal was prepared by Tom J. Boyle, Jr. an associate real estate

trainee appraiser, and David Conaghan, a certified general real estate appraiser, for ad valorem tax purposes.

The appraisers inspected the subject on October 26, 2021 and the appraisal includes photographs of the subject with several photographs, presumably taken during the inspection, captioned as depicting "Mold" within the subject unit. The appraisers described the subject's condition as "Uninhabitable/Mold."

Under the sales comparison approach, the appraisers selected six comparable sales located within 0.55 of a mile from the subject. The appraisers stated they selected comparables similar to the subject in dwelling size and located within one mile of the subject. The comparables are improved with 2-bedroom/2-bathroom condominium units ranging in size from 1,100 to 1,600 square feet of living area. The comparables are 19 or 43 years old and are reported to be in good condition. Each comparable features central air conditioning and one garage or exterior parking space. Two comparables each have a fireplace. The comparables sold from October 2019 to September 2020 for prices ranging from \$331,000 to \$355,000 or from \$218.75 to \$320.00 per square foot of living area, including land. The appraisers adjusted comparables for differences from the subject, date of sale, and sales/financing concessions to arrive at adjusted prices from \$344,100 to \$369,100. The appraisers concluded a value for the subject of \$350,000 as of January 1, 2021.

Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$52,139. The subject's assessment reflects a market value of \$521,390 or \$309.98 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted a sales analysis prepared by Ashton Language based on one sale within the subject's condominium in August 2022 for price of \$357,000. Based on this property's 23.9100% interest in the common elements of the condominium and sale price, a value of \$1,493,099 was computed for the condominium.<sup>1</sup> 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.Adm.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.Adm.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

---

<sup>1</sup> The Board calculates a value of \$400,598 for the subject based on this sales analysis (\$1,493,099 x 26.8300%)

The appellant presented an appraisal and the board of review presented a sales analysis in support of their respective positions before the Board. The Board gave less weight to the appraised value conclusion as the appraisers selected five comparables that are much smaller dwellings than the subject despite stating dwelling size was one of the criteria for selection of these comparables. Moreover, the Board finds the appraisers made adjustments for dwelling size that are not supported in the appraisal. The appraisers stated the subject had mold but did not provide any explanation or specify whether the subject's condition as of the October 2021 inspection was the same as on January 1, 2021. For these reasons, the Board finds the appraisal states a less credible and/or reliable opinion of value and the Board will instead consider the raw sales presented in the appraisal and by the board of review.

The record contains a total of seven comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #1, #2, #3, #4 and #6, which are significantly smaller dwellings than the subject. The Board finds the best evidence of market value to be the appraisal sale #5, which is the most similar to the subject in dwelling size, and the board of review's comparable, which is the most similar to the subject in location within the subject's condominium. These two comparables sold for prices of \$350,000 (or \$218.75 per square foot of living area, including land) and \$357,000. The subject's assessment reflects a market value of \$521,390 or \$309.98 per square foot of living area, including land, which is above the two best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds 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 15, 2025



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

Josphine Pangilinan, by attorney:  
Brian P. Liston  
Law Offices of Liston & Tsantilis, P.C.  
200 S. Wacker Drive  
Suite 820  
Chicago, IL 60606

COUNTY

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