



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

APPELLANT: George Gorsline  
DOCKET NO.: 23-00065.001-R-2  
PARCEL NO.: 14-000-027-21

The parties of record before the Property Tax Appeal Board are George Gorsline, the appellant; and the Jo Daviess 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 **Jo Daviess** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$25,266  
**IMPR.:** \$100,762  
**TOTAL:** \$126,028

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Jo Daviess 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.

**Preliminary Matter**

The parties appeared before the Property Tax Appeal Board on March 9, 2026 at the Jo Daviess County Courthouse in Galena pursuant to prior written notice dated January 22, 2026. Appearing was George Gorsline, the appellant, and on behalf of the Jo Daviess County Board of Review was Laura Edmonds, Chief County Assessment Officer for Jo Daviess County.

The appellant is seeking a reduction in assessed value for the subject property that is greater than \$100,000 and was notified in the January 22, 2026 hearing notice that a court reporter was required pursuant to PTAB rule 1910.98(a). Mr. Gorsline did not obtain a court reporter, explaining he had attempted to obtain the services of a court reporter but was not successful and requested the hearing be postponed.<sup>1</sup> Concurrently, Laura Edmonds, the Chief County Assessment Officer for Jo Daviess County, stated the Jo Daviess County Board of Review would

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<sup>1</sup> Mr. Gorsline presented a letter to the ALJ documenting step he had taken to find a court reporter which has been added to the record as Exhibit A.

waive their request for hearing in this matter and have the Property Tax Appeal Board make a decision on the written record. The hearing officer reserved ruling in this matter. The Board finds the appellant did not request a hearing and the board of review verbally waived their requested hearing in this matter, therefore, a decision shall be written on the record evidence.

### **Findings of Fact**

The subject property consists of a partially constructed 1-story dwelling of masonry exterior construction with 2,094 square feet of unfinished living area. Construction of the dwelling began in 2008 and is ongoing. Upon completion, the home will include a basement, central air conditioning, one fireplace and a 1,231 square foot garage. The subject property also features a 1,000 square foot Quonset hut. The property has a 9.51-acre site and is located in Galena, Rice Township, Jo Daviess County.

The appellant submitted written comments describing the subject property along with a copy of the subject's property record card and 20 interior and exterior photographs most of which were dated September 22, 2023.<sup>2</sup> The appellant asserted the subject is being constructed to federal Leadership in Energy and Environmental Design (LEED) standards and that the dwelling is not habitable, has little drywall in place, the electric and plumbing are essentially complete but exposed and that no heating or cooling has been installed. The photographs submitted by the appellant depict the dwelling has a foundation, exterior walls, doors, windows, roofing, subfloors, framing for room partitions, lighting and electric appear to be in place along with a fireplace rough-in. No kitchen or bathroom fixtures are visible. The appellant stated, "[t]he house is **not habitable** by any means, and I was under the assumption that this was supposed to be a large factor in determining the taxable value."

The appellant contends overvaluation and assessment inequity with respect to both the land and building assessments as the bases of the appeal.

In support of the overvaluation argument the appellant submitted information on the cost to construct the subject dwelling. The appellant completed Section VI – Recent Construction Information on Your Residence of the appeal petition stating the subject site was purchased in April 2007 for a price of \$84,000. The appellant disclosed that costs incurred to date for construction of the home and Quonset hut total \$210,000 and that the appellant is acting as his own general contractor with an estimated value of \$30,000. Combined, these costs total \$324,000. The appellant also submitted a copy of the Buyers Closing Statement which confirmed the purchase date and price for the subject site. The appellant did not submit a contractor's affidavit nor any documentation to support the construction costs disclosed in the appeal petition.

In support of the land inequity argument, the appellant submitted information on four land comparables located adjacent to, one lot away or within 0.30 of a mile from the subject. The comparables have sites that range in size from 7.44 to 13.10 acres of land area. Comparable #3 consists of 6.14 acres of farmland and a 5.48 acre homesite. The comparables have non-farm

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<sup>2</sup> The appellant disclosed the photographs of the front door and exterior front of the house were not taken on September 22, 2023.

land assessments ranging from \$15,026 to \$26,457 or from \$1,482 to \$2,020 per acre of land area. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$16,000 with a land assessment of \$16,000 or \$1,682 per acre of land area and an improvement assessment of \$0.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$126,028 which reflects a market value of \$374,860 or \$179.02 per square foot of unfinished living area, land included when applying the 2023 three-year average median level of assessment for Jo Daviess County of 33.62%. The subject property has a land assessment of \$25,266 or \$2,657 per acre which equates to a market value of \$75,806.

The board of review critiqued the appellant's land comparables contending comparables #2 and #4 are raw unimproved lots with no well or septic service; that comparable #1 has a chemical stool in lieu of a septic system and that comparable #3 has both farmland and homesite acreage unlike the subject.

The board of review did not submit any comparable sales in support of the appellant's overvaluation argument but rather provided cost information for the subject's improvement. The board of review contended that if 100% complete the subject dwelling would have a market value of \$465,101, calculated in part, on a base cost of \$117.00 to \$129.00 per square foot of living area for all dwellings constructed from 2000 to present and in good condition for the 2023 tax year. However, the board of review submitted a New Construction Check List which disclosed the subject property to be approximately 65% complete, which when applied to the market value of \$465,101 results in the subject's current improvement assessment. The board of review also submitted a copy of the appellant's building permit dated April 2008 which disclosed a total permit cost of \$200,000 for a new home and an accessory structure.<sup>3</sup>

The board of review agreed that the subject dwelling was not habitable but contended that pursuant to the Property Tax Code, the assessor shall discover, list, value and assess real property and their improvements in order to determine the assessment of each property in its jurisdiction. The board of review submitted language from sections 9-95, 9-155, 9-160, 9-175 and 9-180 of the Property Tax Code to support this contention. (35 ILCS 200/9-95; 9-155; 9-160; 9-175; 9-180)

The board of review described the subject's Quonset hut as omitted property and in their written comments requested this Board "evaluate the value" of the "Quonset shed on the property" which "still needs to be assessed."

As to the subject's land value, the board of review contended the subject site is improved with a private well and septic sewer system. The board of review submitted copies of the On-Site Sewage Disposal Permit and Private Sewage Disposal Inspection Report documenting the presence of a septic sewer system on the subject site. The board of review reported the subject's

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<sup>3</sup> On page 5 of the board of review's written comments, the permit amount is identified as totaling \$300,000 "divided into \$200,000 for the house and \$100,000 for the accessory structure." The Board finds the appellant's Building Permit Application discloses a project consisting of a new home and accessory structure with a total value excluding land of \$200,000.

site value is calculated using \$24,238 for the first acre and \$6,060 for each additional acre or a total market value of \$75,806, rounded.<sup>4</sup> The board of review asserted this methodology is applied to all sites improved with well and septic. The board of review argued the market value of the subject's site based on its assessment falls below the 2007 purchase price of \$84,000.

In support of its contention of the correct assessment for both land and improvement assessments, the board of review submitted a grid analysis and property record cards with information on six equity comparables located from 30 feet to 3.30 miles from the subject property. Board of review comparable #1 is the same property as the appellant's comparable #3. Comparables #1 through #4 are classified as farmland with buildings while comparables #5 and #6 are classified as land/lot-improved rural with no farmland component. The comparables have sites that range in size from 10 to 34.20 acres of land area and are improved with 1.5-story or 2-story dwellings of frame exterior construction ranging in size from 1,506 to 3,743 square feet of living area. The homes were built from 1870 to 2021. Five comparables have a basement, with one having finished area. Each comparable has central air conditioning and five properties have one or two garages ranging in size from 264 to 1,080 square feet of building area.<sup>5</sup> Three dwellings each have one fireplace. Comparable #4 had a 960 square foot pole building and comparable #6 has an inground swimming pool, 1,836 square foot barn, 936 square foot Quonset hut, a 750 square foot poultry house, five sheds and a lean-to. The comparables have land assessments ranging from \$9,375 to \$26,296 or from \$304 to \$2,630 per acre of land area<sup>6</sup> and improvement assessments ranging from \$44,393 to \$170,911 or from \$29.48 to \$53.73 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In rebuttal, the appellant argued the subject dwelling is uninhabitable and has never been approved for occupancy. The appellant asserted there are errors in the description and overall percentage completed for the subject arguing no rooms are finished, electric and plumbing is exposed and the dwelling has not been inspected. As to other amenities, the appellant contended no patio, wood deck, concrete, drainage and grading is not complete and that only one fireplace will be present in the completed dwelling. The appellant further contended Property Tax Code statutes presented by the board of review include wording that is "predicated on the dates that either the property has an occupancy permit or is habitable" and neither of these are true for the subject.

### **Conclusion of Law**

The appellant contends, in part, that 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

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<sup>4</sup>  $(\$24,238 + (8.51 * \$6,060)) = (\$24,238 + \$51,571 \approx \$75,809)$

<sup>5</sup> Some descriptive details for the board of review comparables was found in the respective property record cards submitted by the board of review. The Board notes that the property record cards for the board of review's six comparables depicts no farm building assessment component for any of the properties.

<sup>6</sup> The Board finds the best description of the comparables' land assessment was found in their respective property record cards which report both the farmland and homesite components.

appellant did not meet this burden of proof and a reduction in the subject's assessment, based on overvaluation, is not warranted.

The parties submitted documentation supporting the purchase price of the subject's land for \$84,000 on April 27, 2007, the appellant submitted information disclosing total costs to date of \$210,000 and that he is acting as his own general contractor which he estimated has a value of \$30,000 for a total reported costs as of January 1, 2023 of approximately \$324,000. The board of review submitted a copy of the appellant's 2008 permit application totaling \$200,000 for home and an accessory building in addition to information contending the fully completed subject dwelling has a market value of \$465,101 as of January 1, 2023.

The Board gives little weight to the subject's 2007 purchase of the subject site and associated 2008 permit as these documents are dated more than 15 years prior to the January 1, 2023 assessment date at issue. Furthermore, the appellant failed to provide any supporting documentation for his reported construction costs and neither party submitted comparable sales to support the subject's market value, relying on cost values with little documentation or support. Therefore, the Board finds the appellant did not show the subject is overvalued based on a preponderance of the evidence and a reduction based on overvaluation is not warranted.

The appellant also contends assessment inequity with respect to the subject's land and improvement assessments. 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 of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds a reduction in the subject's assessment is not warranted.

As an initial matter, the appellant argued the subject improvements should have an assessment of \$0 because the dwelling is not habitable and therefore not assessable. The Board finds this argument to be without merit. Section 1-130(a) of the Property Tax Code defines real property, in part, as:

The land itself, with all things contained therein, and also all buildings, structures and improvements, and other permanent fixtures thereon...

Section 9-145(a) of the Property Tax Code addresses the statutory level of assessment and provides that:

Except in counties with more than 200,000 inhabitants which classify property for purposes of taxation, property shall be valued as follows:

(a) Each tract or lot of property shall be valued at 33 $\frac{1}{3}$ % of its fair cash value.

And finally, Section 9-160 of the Property Tax Code discusses the assessors' duty when assessing property during a non-quadrennial year providing in part that:

On or before June 1 in each year other than the general assessment year, in all counties with less than 3,000,000 inhabitants...the assessor shall list and assess all property which becomes taxable and which is not upon the general assessment, **and also make and return a list of all new or added buildings, structures or other improvements of any kind, the value of which had not been previously added to or included in the valuation of the property on which such improvements have been made, specifying the property on which each of the improvements has been made, the kind of improvement and the value which, in his or her opinion, has been added to the property by the improvements...**[emphasis added]

Taken together, these sections of the Property Tax Code allow for the assessment of permanent fixtures, including a partially completed dwelling, at a level reflecting 33 $\frac{1}{3}$ % of its fair market value and further provides that the assessor can inspect the property before June 1 to determine what additional construction has occurred from the previous year and value the additional improvements to the extent value has been added.

Furthermore, section 16-180 of the Property Tax Code is not applicable in this situation. Section 16-180 applies in establishing the proportionate assessment from the date an occupancy permit is issued or when the added improvement is habitable and fit for occupancy or for the intended or customary use to the end of the year. In this appeal, none of these criteria are met as the property was not habitable or fit for occupancy during 2023.

With respect to the equity argument for the subject's land assessment, the parties submitted nine equity comparables, as one property was common to both parties, for the Board's consideration. The Board gives less weight to the appellant's comparables and board of review comparables #1, #2, #3 and #4, including the common property. These parcels differ from the subject in having farmland acreage or lack water and/or septic sewer services in contrast to the subject. The Board finds board of review comparables #5 and #6 are more similar to the subject in site size and include water and septic sewer services, like the subject. These two comparables have land assessments of \$26,275 and \$26,296 or \$2,625 and \$2,630 per acre of land area. The subject property has a land assessment of \$26,266 or \$2,657 per acre of land area which falls below the two best land comparables in the record on an overall land assessment basis and slightly above the range on a per acre basis. After considering adjustments to the comparables for differences from the subject, the Board finds a reduction in the subject's land assessment is not supported.

As to the subject's improvement assessment, the record contains six equity comparables for the Board's consideration, one of which was submitted by both parties. However, the Board finds each of these comparables are dwellings that are 100% complete and habitable in contrast to the subject property which is partially completed and not habitable. As a result, the Board finds it is not possible to perform any meaningful analysis as these improvement comparables are substantially different in functional utility when compared to the subject.

The record also contains a New Construction Check List which disclosed the subject property to be approximately 65% complete. The subject's property record card disclosed the property was determined to be 65% and assessed accordingly. The appellant did not present any evidence

challenging this completion percentage or offer evidence establishing an alternative percentage of completion of the subject dwelling. Therefore, based on the evidence in the record, the Board finds a reduction, based on inequity in the improvement assessment 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: \_\_\_\_\_

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

AGENCY

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