



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Youssi Rentals, LLC
DOCKET NO.: 24-02916.001-R-1
PARCEL NO.: 06-31-327-008

The parties of record before the Property Tax Appeal Board are Youssi Rentals, LLC, the appellant, by attorney James C. Thompson, of Shriver, O'Neill & Thompson in Rockford; and the DeKalb 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 **DeKalb** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$12,540
IMPR.: \$164,580
TOTAL: \$177,120

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the DeKalb 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 parties appeared before the Property Tax Appeal Board on December 11, 2025, for a hearing at the DeKalb County Administrative Building in Sycamore pursuant to prior written notice dated November 6, 2025. Appearing was the appellant, Chris Youssi, owner of Youssi Rentals, LLC, represented by attorney James C. Thompson. Appearing on behalf of the DeKalb County Board of Review were Dan Cribben, Brian Rosenow and John Linderoth, members, along with Bridgette Nodurft Supervisor of Assessments for DeKalb County and witness Kevin Schnezler, Sycamore Township Assessor.¹

The subject property consists of a 1-story, 2-unit duplex building of frame and masonry exterior construction with 2,880 square feet of gross living area, constructed in 2023. Each of the 2-units

¹ A consolidated hearing was conducted which included three appeals by the same appellant with similar arguments and evidence. The dockets include: 24-02916, 24-02917 and 24-02918.

includes a basement, central air conditioning, one fireplace and 2-car garage. The property has an approximately 11,700 square foot site and is located in Sycamore, Sycamore Township, DeKalb County.

Mr. Thompson delivered an opening statement contending the 2024 increased assessment of the subject property places a market value on the subject which exceeds his client's actual construction costs. Furthermore, Thompson stated the appellant believes the use of the income approach to value is logical since the property is rented.

Ms. Nodurft objected to the admissibility of the appellant's income approach to value for the subject, testifying it is new evidence, submitted in rebuttal, which the board of review was unable to rebut.

The Board finds the appellant submitted evidence in rebuttal to support a value for the subject property based on its income earning potential. This evidence and was not previously submitted by the appellant as part of the original market value argument and the board of review was not given any opportunity to rebut this new argument. Section 1910.66(c) of the rules of the Property Tax Appeal Board provides:

Rebuttal evidence shall not consist of new evidence such as an appraisal or newly discovered comparable properties. A party to the appeal shall be precluded from submitting its own case in chief in the guise of rebuttal evidence. (86 Ill.Admin.Code 1910.66(c))

Therefore, pursuant to this rule, the Property Tax Appeal Board finds the income approach evidence submitted by the appellant to be improper rebuttal evidence which shall not be considered by the Board in its determination of the subject's correct assessment.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on the cost to construct the subject duplex. The appellant completed Section – VI – Recent Construction Information on Your Residence of the appeal petition stating the subject site was purchased on July 9, 2021, for a price of \$32,000 and the total cost to construct the 2-unit building was \$349,854 resulting in a total cost of \$381,854. The appellant disclosed the owner acted as the general contractor and estimated the value of the service to be \$0. The appellant indicated as of November 30, 2023, the duplex was completed with an occupancy permit issued and was fit for occupancy. The appellant included a copy of the Certificate of Occupancy issued by the City of Sycamore. To further document the cost of construction, the appellant submitted a copy of a sworn contractor's statement that was notarized, signed and dated by the contractor/owner.

To further support the market value of the subject property, the appellant submitted a copy of a Construction and Purchase Contract dated August 3, 2023, documenting the sale of 538-540 Anjali Court for a purchase price of \$372,000, including the lot cost of \$32,000. The appellant also submitted a signed affidavit attesting to the construction costs for this same property which totaled \$378,917 after adjustments. No expense for general contractor services were disclosed in the construction costs for this property which is a similar 2-unit duplex property.

Thompson called as a witness, the appellant, Chris Youssi. Youssi testified he was the owner of Youssi Rentals, LLC and has been building attached dwellings in Iowa and Illinois since 2003. Youssi testified the board of review's cost approach is flawed, because the cost to construct a duplex and the cost to construct a 2-unit condominium are not the same. Youssi testified that "use" as either a rental duplex or a owner occupied condominium affects market value.

As to the subject's land value, Youssi testified the land value for the subject property should reflect its July 2021 purchase price of \$32,000. Youssi testified the subject site was "shovel ready" at the time of purchase and that the subject's 2-units have a single parcel number. Youssi testified that one cannot take the value of two 1-unit dwellings to obtain the market value for the subject's 2-unit building. Youssi attested the best evidence of the subject property's market value to be the cost to construct plus land value which he argued is supported by the 2-unit sale submitted.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$127,500 which reflects a market value of \$382,538 or \$132.83 per square foot of gross living area, including land, when using the statutory level of assessment of 33.33%.

Under cross examination, Youssi testified that units constructed by Youssi Rentals, LLC all have similar materials and craftsmanship and comply to the same building codes. Regarding contractor costs, Youssi testified that in general a contractor should expect to be paid for acting as a general for a construction project, however, because he owns the company, he doesn't pay himself for this service which is why he reported \$0 for acting as the general contractor.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$177,120. The subject's assessment reflects a market value of \$531,413 or \$184.52 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In response to the appellant's evidence, Nodurft testified the subject's 2024 land assessment of \$12,540 reflects a market value below its 2021 sale price adjusted by the application of equalization factors for 2022 (1.0652), 2023 (1.0903) and 2024 (1.0951) which would total \$13,566. With respect to the appellant's comparable sale of 538-540 Anjali Court, the board of review submitted a copy of the PTAX-203 Real Estate Transfer Declaration which disclosed this property was not advertised for sale on the open market and that the buyers are one of the appellant's subcontractors.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located across the street from the subject. Each of the board of review's comparables is the sale of a single attached unit. The comparables are improved with 1-story duplex style attached dwellings of vinyl and brick exterior construction each with 1,440

² Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

square feet of living area that were built in 2023.³ The comparables each have a basement, central air conditioning, one fireplace and a 500 square foot garage. The comparables sold from January to September 2024 for prices ranging from \$304,737 to \$318,853 or from \$211.62 to \$221.43 per square foot of living area, land included.

Nodurft introduced Kevin Schnezler, Sycamore Township Assessor who testified he is a Certified Illinois Assessing Officer and has been assessing property for more than 30 years. Under questioning, Schnezler testified the cost approach values for the subject, as reported in the subject's property record card, come from either Marshall & Swift Residential Cost service or the Illinois Department of Revenue. Schnezler testified that, when properties have identical physical characteristics, there is no difference in determining their cost based on status as rental, owner occupied or if it is called a duplex or condominium.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

Under cross examination, Schnezler testified he is not aware of a difference in costs in the Devnet system for a condo versus a duplex.

In written rebuttal, the appellant asserted cost to construct information submitted by the board of review is from an internet search in contrast to the appellant's actual construction costs. The appellant also asserted the subject site was ready for development and that no additional improvements were required that would add value to the lot. The appellant submitted income approach information in rebuttal, which has been determined to be inadmissible rebuttal evidence.

In response to questions from the ALJ, Youssi testified that Youssi Rentals, LLC benefits from "tremendous discounts" in costs of all building materials because of the volume of building they are involved in. Youssi testified the units are mostly identical with condominium units receiving some upgrades such as covered decks, enclosed porch and/or interior finishes. Youssi testified that the units located across the street from the subject have a superior view of a field. Youssi further testified that inherent costs excluded from his sworn affidavit include real estate commissions, profit and overhead, carrying costs and closing costs.

In closing, Thompson argued the evidence submitted by the appellant demonstrated that a condominium unit is worth more than a duplex unit because of added amenities such as covered deck and/or enclosed porch. Thompson noted that all of the board of review comparables have a deck or porch amenity and are considered condominium units.

Nodurft summarized the board of review's case contending the cost to construct should be market based and not specific to one contractor's costs. Nodurft testified the appellant has not presented all necessary evidence to support the true cost to construct since cost figures submitted exclude costs of the general contractor's service or for profit.

³ No site sizes were provided in the board of review's grid analysis.

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.

As an initial matter, the appellant contended that a 2-unit duplex and an identical 2-unit condominium have different costs. The appellant testified the condominium units have additional amenities and/or upgrades. The Sycamore Township assessor testified that costs for identical 2-unit properties would be identical regardless of whether the property is a duplex, a condominium, is owner occupied or is rented. The Board finds that the condominium units are more expensive to construct because they have additional amenities and/or upgrades not found in the rental duplex units built by the appellant.

The Board finds the subject parcel consists of real property including both land and improvements thereon. In Showplace Theatre Company v. Property Tax Appeal Board, 145 Ill.App 3d. 774 (2nd Dist. 1986), the court held an appeal to the Property Tax Appeal Board includes both land and improvements and together constitute a single assessment in this market value case. In Showplace, although the appellant only disputed the subject's land value based on a recent allocated sale price, the Appellate Court held the Property Tax Appeal Board's jurisdiction was not limited to a determination of the land value alone. In accordance with Showplace, the Property Tax Appeal Board shall analyze the subject's land and improvements together in making the determination on whether its assessment is reflective of its fair cash value.

Section 1-50 of the Property Tax Code defines fair cash value as:

The amount for which a property can be sold in the due course of business and trade, not under duress, between a willing buyer and a willing seller. (35 ILCS 200/1-50)

Similarly, Illinois Courts have stated fair cash value is synonymous with fair market value and is defined as the price a willing buyer would pay a willing seller for the subject property, there being no collusion and neither party being under any compulsion. Springfield Marine Bank v. Property Tax Appeal Board, 44 Ill.2d 428, 256 (1970) and Ellsworth Grain Company v Property Tax Appeal Board, 172 Ill.App.3d 552, 526 (4th Dist. 1988). The Board finds the comparable sales presented by the board of review better meet this definition of fair cash value than the cost data and comparable sale presented by the appellant.

To support their respective positions before the Property Tax Appeal Board, the appellant provided information documenting the purchase price of the subject's land for \$32,000 along with a signed affidavit documenting construction costs for the improvement of \$349,854 for a combined total cost for the subject property of \$381,854. To further support the market value of the subject property the appellant submitted evidence of the sale of a nearly identical 2-unit duplex, for \$372,000 on August 30, 2023. The board of review provided four comparable sales

of individual attached duplex style units located across the street from the subject property and the PTAX-203 Real Estate Transfer Declarations for the appellant's comparable sale and each of the board of review's comparables.

The Board finds the contractor's sworn affidavit and appeal petition lack any costs for acting as the general contractor in the construction of the subject property, which the appellant acknowledged in testimony. As to the sale of a nearly identical 2-unit building for a price of \$372,000, the Board finds the PTAX-203, submitted by the board of review, disclosed this sale was not advertised and that the buyers are subcontractors for the appellant calling into question the arm's length nature of the sale. As a result, the Board gives less weight to the appellant's cost and comparable sale.

The board of review presented four comparable sales of single unit attached duplex style dwellings that are identical or nearly identical to the subject in location, dwelling size per unit, design, age and features. However, the appellant testified these units have either a covered deck or enclosed porch amenity lacking in the subject property. These four comparables sold from January to September 2024 for prices ranging from \$304,737 to \$318,853 or from \$211.62 to \$221.43 per square foot of living area, land included. The subject's assessment reflects a market value of \$531,413 or \$184.52 per square foot of living area, land included, which falls above the range established by the best comparables in the record on an overall market value basis and below the range on a per square foot basis.⁴ Accepted real estate theory provides that, all things being equal, as the size of a property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. Therefore, given the subject property's larger square footage of living area relative to the best comparables, a higher overall market value and lower per square foot value is logical. After considering adjustments to the comparables for differences from the subject, the Board finds these sales demonstrate the subject's assessment is not excessive and is reflective of the market value of the property as of January 1, 2024.

⁴ The subject's total assessment equates to approximately \$265,707 per unit, which is substantially below the purchase prices of the single unit sales presented by the board of review.

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:

January 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 9-125 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

Youssi Rentals, LLC, by attorney:
James C. Thompson
Shriver, O'Neill & Thompson
515 North Court Street
Rockford, IL 61103

COUNTY

DeKalb County Board of Review
DeKalb County Admin Building
110 East Sycamore
Sycamore, IL 60178