

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Al & Amy Tolu-Honary

DOCKET NO.: 24-03571.001-R-1 PARCEL NO.: 18-18-01-151-010

The parties of record before the Property Tax Appeal Board are Al & Amy Tolu-Honary, the appellants; and the Stephenson 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 **Stephenson** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$15,332 **IMPR.:** \$52,739 **TOTAL:** \$68,071

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants timely filed the appeal from a decision of the Stephenson 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 consists of a 1.5-story dwelling of frame exterior construction with 2,186 square feet of living area. The dwelling was constructed in 1939. Features of the home include a basement with finished area, central air conditioning, two fireplaces, a 594 square foot shed, and a 676 square foot garage. The property has an 83,635 square foot site and is located in Freeport, Freeport Township, Stephenson County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted information on six comparable sales located from one to two miles from the subject. The comparables consist of 2-story dwellings of brick or frame exterior construction ranging in size from 1,878 to 2,802 square feet of living area. The homes were built from 1907 to 1940. Each dwelling has a basement and a garage ranging in size from 252 to 1,012 square

¹ The Board finds the subject's property record card submitted by the board of review, which was not refuted by the appellants in rebuttal, to be the best evidence of the subject's dwelling size and features.

feet of building area. Five comparables have central air conditioning and two comparables each have one or two fireplaces. The parcels range in size from 1,061 to 66,211 square feet of land area. The comparables sold from April 2021 to June 2023 for prices ranging from \$112,900 to \$180,000 or from \$54.22 to \$70.15 per square foot of living area, including land. Based on this evidence, the appellants requested a reduced assessment of \$60,693, for an estimated market value of \$182,097 or \$83.26 per square foot of living area, including land, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$68,071. The subject's assessment reflects a market value of \$204,233 or \$93.39 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In support of its contention of the correct assessment the board of review submitted information on six comparable sales, five of which are located from .51 to .94 of a mile from the subject. The comparables consist of 1.5-story or 2-story dwellings of brick or frame exterior construction ranging in size from 1,976 to 2,624 square feet of living area. The dwellings were built from 1924 to 1978. Each dwelling has central air conditioning, one to three fireplaces, a basement with four having finished area, and a garage ranging in size from 528 to 1,900 square feet of building area. Comparable #6 has an additional dwelling. The parcels range in size from 9,000 to 265,716 square feet of land area. The comparables sold from October 2021 to November 2023 for prices ranging from \$178,500 to \$395,000 or from \$81.94 to \$158.83 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellants argued that the board of review's comparables differ from the subject in age and/or location.

Conclusion of Law

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of 12 comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to the appellants' comparables #2, #3, #5, and #6, as well as board of review comparables #2, #3, #4, and #6, which sold less proximate to the January 1, 2024 assessment date at issue. Additionally, board of review comparable #6 contains two dwellings unlike the subject.

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 §1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

The Board finds the best evidence of market value to be the appellants' comparable sales #1 and #4 along with board of review comparable sales #1 and #5, which sold proximate to the assessment date at issue and have varying degrees of similarity to the subject in age and dwelling size. These most similar comparables sold from February to November 2023 for prices ranging from \$112,900 to \$215,000 or from \$60.12 to \$88.97 per square foot of living area, including land. The subject's assessment reflects a market value of \$204,233 or \$93.39 per square foot of living area, including land, which is within the range established by the best comparable sales in this record overall and above the range on a per-square-foot basis. The Board finds the subject's estimated market value is reasonable given the subject's larger site and shed in relation to the best comparables. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's 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.

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	Chairman
C. R.	Sobot Stoffen
Member	Member
Dan De Kinie	Sarah Bobbler
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:	November 25, 2025
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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 <u>PETITION AND EVIDENCE</u> 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

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COUNTY

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