



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

APPELLANT: Susan M Koester Trust  
DOCKET NO.: 24-04902.001-R-1  
PARCEL NO.: 18-13-26-179-008

The parties of record before the Property Tax Appeal Board are Susan M Koester Trust, the appellant; 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:** \$9,705  
**IMPR.:** \$37,087  
**TOTAL:** \$46,792

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a final administrative decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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-story raised-ranch style dwelling of frame exterior construction with 1,708 square feet of living area. The dwelling was constructed in 1989. Features of the home include a basement, central air conditioning, and a 2-car garage with 700 square feet of building area. The property has a 138,085 square foot, or 3.17 acre, site and is located in Freeport, Freeport Township, Stephenson County.

The appellant raises a contention of law. The appellant asserts the subject property is an owner-occupied residence that was the subject of an appeal before the Board the tax prior year as Docket No. 23-05999.001-R-1, in which the Board issued a decision lowering the subject's assessment to \$38,776 based on the evidence presented by the parties. The appellant contends the 2024 tax year is within the same general assessment cycle as the prior tax year decision, the subject property has not subsequently sold, and the prior tax year decision was not reversed or

modified on review. The appellant requests the subject's 2023 tax year assessment be carried forward to the 2024 tax year, subject to equalization.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$46,792. The subject's assessment reflects a market value of \$140,390 or \$82.20 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>1</sup> The board of review disclosed 2024 was the first year of the general assessment cycle for the subject property.

With respect to the appellant's request to carry forward the 2023 tax year assessment to the 2024 tax year, the board of review contends 2024 is not in the same general assessment cycle as 2023 and is not entitled to a rollover under section 16-185 of the Property Tax Code. Moreover, the appellant did not file a complaint with the board of review but filed this appeal directly to the Board from the prior year final administrative decision of the Board on the sole basis of a contention of law requesting the rollover.

In support of its contention of the correct assessment, the board of review submitted information on nine comparable sales located within 0.59 of a mile from the subject. The comparables have varying degrees of similarity to the subject in design, dwelling size, age, site size, and features, and sold from May 2021 to May 2024 for prices ranging from \$149,625 to \$216,000 or from \$93.68 to \$127.06 per square foot of living area, including land. Based on this evidence, the board of review requested the subject's assessment be sustained.

### **Conclusion of Law**

The appellant raised a contention of law asserting that the assessment of the subject property as established by the Board for the 2023 tax year should be carried forward to the 2024 tax year pursuant to section 16-185 of the Property Tax Code. (35 ILCS 200/16-185). When a contention of law is raised the burden of proof is a preponderance of the evidence. (See 5 ILCS 100/10-15). The Board finds the appellant did not meet this burden of proof for a contention of law and no reduction in the subject's assessment is warranted based upon section 16-185.

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) states in part:

If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review.

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<sup>1</sup> Section 1910.50(c)(1) of the Board's procedural rules 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). As of the development of this Final Administrative decision, the Department of Revenue has not published figures for tax year 2024.

The Board finds one of the key elements for the "rollover" provision to be applied is that the prior tax year for which the final administrative decision was issued must be within the same general assessment cycle as the tax year at issue. The record disclosed the Board issued a decision reducing the subject's assessment for the 2023 tax year and that the subject property was an owner-occupied dwelling in 2024. However, the record establishes that tax years 2023 and 2024 are not within the same general assessment period in Freeport Township, Stephenson County. Based on this record, the Board finds the subject is not entitled to a reduction in the subject's assessment under section 16-185.

Additionally, the appellant did not otherwise challenge the correctness of the subject's assessment with market value or equity data. The board of review submitted nine comparable sales that sold for prices ranging from \$149,625 to \$216,000 or from \$93.68 to \$127.06 per square foot of living area, including land. The subject's assessment reflects a market value of \$140,390 or \$82.20 per square foot of living area, land included, which falls below the range established by the only comparables in this 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 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

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: February 17, 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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