



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

APPELLANT: J. S. Mundelein Property, Inc.  
DOCKET NO.: 23-03140.001-C-1  
PARCEL NO.: 11-31-100-063

The parties of record before the Property Tax Appeal Board are J. S. Mundelein Property, Inc., the appellant, by attorney Scott J. Linn, of the Law Offices of Scott J. Linn in Northbrook; and the Lake 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 **Lake** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$160,804  
**IMPR.:** \$399,027  
**TOTAL:** \$559,831

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Lake 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.

**Findings of Fact**

The subject property consists of a 1-story commercial building of brick exterior construction with 16,144 square feet of building area.<sup>1</sup> The building was constructed in 1979. The property has a 50,094 square foot site, a land to building ratio of 3.10:1 and is located in Mundelein, Libertyville Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales located from 1 to 6 miles from the subject. The parcels range in size from 9,583 to 631,620 square feet of land area and have land to building ratios from 1.28:1 to 4.94:1. The comparables are improved with 1-story buildings of

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<sup>1</sup> The parties differ regarding some of the subject's features. The Board finds the best evidence of its features and amenities is found in the appellant's evidence, where the board of review submitted the subject's property record card that was blank regarding building size, age, and other features.

brick exterior construction ranging in size from 12,270 to 127,712 square feet of building area. The buildings were constructed from 1960 to 1998. The comparables sold from December 2021 to November 2023 for prices ranging from \$1,125,000 to \$12,100,000 or from \$91.69 to \$109.07 per square foot of building area, including land. Based on this evidence the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$559,831. The subject's assessment reflects a market value of \$1,684,716 or \$104.36 per square foot of building area, land included, when using the 2023 three-year average median level of assessment for Lake County of 33.23% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on six comparable sales located in Highland Park, Highwood, Lincolnshire, Buffalo Grove, and Vernon Hills. The parcels range in size from 10,019 to 429,937 square feet of land area and have land to building ratios from 1.00:1 to 40.53:1. The comparables are improved with 1-story or 2-story commercial buildings of brick exterior construction ranging in size from 10,000 to 26,593 square feet of building area. The buildings range in age from 7 to 103 years old. The comparables sold from May 2021 to December 2022 for prices ranging from \$2,000,000 to \$8,250,000 or from \$108.35 to \$620.07 per square foot of building area, including land.

The board of review submitted a brief contending the appellant's comparables bracket the subject and support its assessment. Based on this evidence 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.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.

The record contains a total of nine comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #2 and #3 and the board of review's comparables #1, #4, #5, and #6, due to substantial differences from the subject in site size and/or building size. The Board gives less weight to the board of review's comparable #3, which has a considerably higher sale price than the other sales in this record, suggesting this sale was an outlier.

The Board finds the best evidence of market value to be the appellant's comparable #1 and the board of review's comparable #2, which sold proximate in time to the assessment date and are more similar to the subject in site size, building size, and some features but have varying degrees of similarity to the subject in age, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. These most similar comparables sold for prices of \$1,600,000 and \$3,200,000 or \$109.07 and \$261.80 per square foot of building area, including

land. The subject's assessment reflects a market value of \$1,684,716 or \$104.36 per square foot of building area, including land, which is bracketed by the best two comparable sales in terms of total market value and below the best comparables on a per square foot basis. 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



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: \_\_\_\_\_

June 17, 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

J. S. Mundelein Property, Inc. , by attorney:  
Scott J. Linn  
Law Offices of Scott J. Linn  
331 Basswood Drive  
Northbrook, IL 60062

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085