



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

APPELLANT: Gordon Anderson Smith TTEE  
DOCKET NO.: 24-02651.001-R-1  
PARCEL NO.: 10-35-300-039

The parties of record before the Property Tax Appeal Board are Gordon Anderson Smith TTEE, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC 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 **A Reduction** 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:

<b>LAND:</b>	\$99,957
<b>IMPR.:</b>	\$0
<b>TOTAL:</b>	\$99,957

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 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 55,365 square foot site with no improvements that is located in Mundelein, Fremont 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 .25 of a mile to 2.07 miles from the subject property. The comparables are unimproved sites that range in size from 53,630 to 165,480 square feet of land area. The properties sold from April 2023 to October 2024 for prices ranging from \$90,500 to \$150,000 or from \$.60 to \$2.05 per square foot of land. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$23,987 which reflects a market value of \$71,968 or \$1.30 per square foot of land area, 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 \$115,480. The subject's assessment reflects a market value of \$346,475 or \$6.26 per square foot of land, when using the statutory level of assessment of 33.33%.<sup>1</sup>

In response to the appellant's appeal and evidence, the board of review submitted an aerial plat of the subject site. This aerial plat depicts the subject site does not have frontage on Countryside Lake, however, the plat further depicts a second parcel, also owned by the appellant, which has frontage on Countryside Lake. This second parcel is not part of the appellant's appeal and appears to lack any ingress or egress access without the contiguous subject parcel. The board of review contended a "typical seller would not generally segregate the subject site from the land-locked waterfront parcel as it would diminish the overall market value of the two parcels".

The board of review critiqued the appellant's comparable land sales contending they lack lake frontage and have lower market values based on their sale prices. In support of this contention, the board of review submitted a map depicting the proximity of both parties' comparables with the subject and Countryside Lake.

In support of its contention of the correct assessment, the board of review submitted information on two comparable properties located .75 and .86 of a mile from the subject property. The comparables are unimproved sites with 81,030 or 161,170 square feet of land area. Each comparable has a lakefront location. Comparables #1 and #2 sold in April 2022 and October 2023 for prices of \$400,000 and \$420,000 or \$2.61 and \$4.94 per square foot of land. Based on this evidence, the board of review requested the subject's assessment be confirmed.

The board of review also submitted a copy of the Multiple Listing Service (MLS) sheet for the subject property which disclosed the subject property was listed for sale on December 14, 2024 for a price of \$299,900 and that the listing was on the market for eight days before being cancelled. The subject's MLS describes the property as "1.24-acres on a glorious waterfront setting on Countryside Lake, priced to sell".

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

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<sup>1</sup> 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.

The Board finds the best evidence of the market value to be the subject's list price of \$299,900 as presented in the MLS sheet submitted by the board of review and not refuted by the appellant. The Board gives less weight to the comparable sales submitted by the parties which have varying degrees of similarity to the subject in lake frontage, site size and/or proximity to the subject. The Board finds the list price is below the market value reflected by the assessment. Based on this record the Board finds the subject property had a market value of \$299,900 as of January 1, 2204.

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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Gordon Anderson Smith TTEE, by attorney:  
Robert Rosenfeld  
Robert H. Rosenfeld & Associates, LLC  
40 Skokie Blvd  
Suite 150  
Northbrook, IL 60062

COUNTY

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