FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Ron Dietrich Legacy Immobilien LLC
DOCKET NO.: 25-03118.001-R-1
PARCEL NO.: 14-12-16-103-034-0000

The parties of record before the Property Tax Appeal Board are Ron Dietrich Legacy Immobilien LLC, the appellant, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; and the Will 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 **Will** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND:	$14,000
IMPR.:	$73,991
TOTAL:	$87,991

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Will County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2025 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 2-story townhouse of vinyl siding and brick exterior construction with 1,876 square feet of living area. The dwelling was constructed in 2021. Features of the home include a slab foundation, central air conditioning and a 2-car garage. The property has an approximately 6,273 square foot site and is located in Manhattan, Manhattan Township, Will County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on January 14, 2025 for a price of $264,000. The appellant indicated the subject property was sold by Madison Lynn Godsey. The appellant also indicated the property was sold through a Realtor, the property had been advertised in the Multiple Listing Service (MLS) and had been on the market for 2 days. To document the sale the appellant provided a copy of the settlement statement, a copy of the

sales contract and a copy of the MLS listing for the subject property. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $95,385. The subject's assessment reflects a market value of $286,184 or $152.55 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.

In support of its contention of the correct assessment the board of review provided a statement from the Manhattan Township Assessor's Office asserting the subject property is located in a special service area (SSA) called Brookstone Springs where bonds have been issued to construct public infrastructure. The property owners are required to pay the SSA tax to retire bonds. The township assessor asserts the price of the property is understated by the amount of the prepayment voucher of $22,182 for the balance of the special tax. The assessor contends the subject's adjusted selling price is $286,182 which includes the SSA lien amount.

The appellant submitted rebuttal comments asserting the sale of the subject property was the best evidence of market value. The appellant also commented on the assessor's assertion that the SSA tax should be considered in adjusting the subject's purchase price.

On September 15, 2026, the Property Tax Appeal Board ordered the parties to produce additional documentation regarding the sale of the subject and the subject property being located in Special Service Area (SSA) within 10 days of this order.[1]

The appellant submitted complete copies of the Settlement Statement and the final sales contract. The appellant also provided a legal brief addressing the impact of a Special Service Area and its impact on the subject's sale and the arm's length nature of the sale that was part of the 1031 Exchange.

The board of review provided a legal brief from the Will County State's Attorney addressing the Special Service Area along with four exhibits that included an unedited and unredacted copy of the Real Estate Transfer Declaration, copies of the 2024, 2025 and 2026 tax bills, a payment schedule from 2024 through 2026 for the SSA, and a certified copy of Satisfaction of Tax Lien.

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.

[1] Both parties responded by the established deadline.

The Board finds the best and only evidence of market value to be the purchase of the subject property in January 2025 for a price of $264,000. The appellant provided evidence demonstrating the sale had elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a Realtor, the property had been advertised on the open market with the Multiple Listing Service and it had been on the market for 2 days. In further support of the transaction the appellant submitted copies of the settlement statement, real estate purchase contract and the MLS listing. The Board finds the purchase price is below the market value reflected by the assessment.

Lastly, the Board finds the board of review submitted a real estate transfer declaration confirming the subject's sale price and sale date. The board of review also did not provide any market value evidence to support its argument that an SSA tax adds value to the real property. Furthermore, the Board finds the board of review has not shown if the SSA would have any impact on the subject's market value relative to properties not located in an SSA.

Based on this record the Board finds a reduction in the subject's assessment commensurate with the appellant's request is appropriate.

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: November 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 9-215 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

Ron Dietrich Legacy Immobilien LLC, by attorney:
Jessica Hill-Magiera
Attorney at Law
790 Harvest Drive
Lake Zurich, IL 60047

COUNTY

Will County Board of Review
Will County Office Building
302 N. Chicago Street
Joliet, IL 60432