

LETHBRIDGE ASSESSMENT REVIEW BOARD  
DECISION WITH REASONS

CARB – 002/2025

**IN THE MATTER OF A COMPLAINT** filed with the City of Lethbridge Composite Assessment Review Board (CARB) pursuant to Part 11 of the *Municipal Government Act* being Chapter M-26 of the Revised Statutes of Alberta 2000 (Act).

**BETWEEN:**

MNP LLP - Complainant

- a n d -

City of Lethbridge - Respondent

**BEFORE:**

Members:

Lana Yakimchuk, Presiding Officer

Andy Cimolai, Member

Sue Medhurst, Member

This is a decision of the City of Lethbridge Composite Assessment Review Board (CARB) from a hearing held on June 18, 2025, respecting the 2025 assessment for the following property.

Roll No./ Property Identifier	Assessed Value	Owner
4-2-240-3210-0001 3210 24 Avenue North	\$1,482,0000	Woodhaven Capital Corp.

Appeared on behalf of the Complainant:

- Grayson Sharples, Agent, MNP LLP

Appeared on behalf of the Respondent:

- Brady Gillies, Assessor, City of Lethbridge
- Tessa Brady, Assessor, City of Lethbridge

**PART A: BACKGROUND AND DESCRIPTION OF PROPERTY UNDER COMPLAINT**

- 1) The subject property, located at 3210 24 AVE N, is a Vacant Industrial Land Parcel situated in the Churchill Industrial Park subdivision. The property consists of a 3.94 Acre site zoned I-G. The property was assessed using the Cost approach to valuation for improvements plus the Sales approach for the land..

**PART B: PRELIMINARY or PROCEDURAL MATTERS**

- 2) The parties raised no specific procedural or preliminary issues and the CARB proceeded to hear the merits of the complaint, as outlined below.

**PART C: MERIT ISSUES**

- 3) Should the Board reduce the land value from \$340,000/Acre (A) to \$300,000/A?
  - a. Should the sales analysis include the post facto sale?

**PART D: COMPLAINANT'S REQUESTED ASSESSMENT: \$1,324,000**

**PART E: SUMMARY OF PARTY POSITIONS**

**Complainant's Position:**

- 4) The Complainant accepted the assessed value of \$142,000 for improvements.
- 5) The Complainant argued that the assessed value for the land is too high. They provided a table of five 2022 to 2024 unimproved land sales, ranging in sale value from \$280,000/A to \$386,719/A and including one sale at \$280,000/sf that occurred 3.5 months after the July 1 assessment deadline. The median price per acre of the five sales was \$336,000/A. The average price was \$326,000A. The sales documentation was provided for the sales included in the table.
- 6) The Complainant argued that land sale values are decreasing over time, so newer sales have more validity. The subject property should be valued in keeping with the most recent sales. The average of the three sales from 2023 and 2024 is \$300,000/A. The median is \$284,000/A. The Complainant asked that the Board reduce the assessed value to \$300,000/A.
- 7) The Complainant included third person sale documents for the post facto sale which state under "Remarks" that *this sale information in its current format has not yet been verified or fully researched.*

**Respondent's Position:**

- 8) The Respondent agreed to four of the sales presented by the Complainant but asked the Board to remove the *post-facto* sale. The assessor could not have considered this sale in its analysis because it occurred after valuation. The City of Lethbridge relied on a three-year sales period, from July 1 2021, to July 1 2024, to establish rates as of the valuation date of July 1 2024. The Respondent showed the average of the four remaining sales was \$338,711/A and the median was \$342,016/A.. The subject assessed land rate was \$340,000/A. Land transfer documentation supported the information in the table.
- 9) In response to the Complainant's assertion that sale values have been going down, the Respondent provided a paired sales analysis of the Index 2 property in the analysis. On July 20

2020 this 3.52 A lot sold for \$700,000 (\$198,864/A). On November 29 2023, it sold again for \$1,000,000 (\$284,091/A), a 43% increase in sale value.

- 10) The Respondent also provided a table of assessment equity comparables and argued that changing the land assessment would compromise fairness and equity for other assessments in the same group.

**CARB Findings:**

- 11) The Board finds that the assessment is supported by the sales.
- 12) The Board did not include the *post facto* sale in its analysis.
- 13) There are four sales in the three-year analysis of land value. A fifth sale is 3.5 months *post facto* and occurred closer to the valuation date than the 2020 sale did. The Board is aware that this *post facto* sale could not have been used in the assessment because it occurred after the mandated July 1 assessment date. The parties provided sale documents which seem to indicate that the *post facto* sale value is accurate, but there was no documentation to show other details, including that it was appropriately marketed as required to confirm it was a market value sale. The support documents provided by the Complainant confirm that further research is required into this sale. In the next year, when a new analysis for the next three-year period is performed, assessors will confirm whether the sale should be included.
- 14) The Board reviewed the analysis and found that if the *post facto* sale was included in the study, the median of the sales would be \$336,207/A and the average would be \$326,969/A. These values support the current estimate of value in the assessment, and are significantly higher than the \$300,000/A request. The Complainant suggests that sale values are on a decline, but the paired sales analysis provided by the Respondent contradicts the downward trend. These paired sales are only one example, but there was insufficient evidence to support a downward trend in values and contradict the paired sales analysis.
- 15) The assessment is for the period ending July 1, 2024. The 2025 assessment will take into consideration 2023, 2024 and 2025 sales up to July 1, 2025 and may at that time include the currently *post facto* sale. The Board will not use the *post facto* sale in the current analysis, nor will it ignore the sales from the three-year period leading to the assessment date. This is the approach used in calculating values in this jurisdiction and allows some continuity and stability in predicting assessment values for taxpayers. The Board finds that it is a reasonable approach. The *post facto* sale is not the sale of the subject, and as such is not a direct measurement of the subject's value. It will not be used by the Board in its analysis for this assessment year.
- 16) The Board finds that the current land assessment is fair and reasonable. The parties agreed to the value of the improvements and the Board accepts the total assessed value.

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**PART F: DECISION**

The Board will not change the assessment. The total assessed value remains \$1,482,000.

**PART G: FINAL DISPOSITION OF COMPLAINT**

The complaint is dismissed.

Roll No./ Property Identifier	Assessed Value	Owner
4-2-240-3210-0001 3210 24 Avenue North	\$1,482,0000	Woodhaven Capital Corp.

Dated at the City of Lethbridge in the Province of Alberta, this XXX day of July, 2025.



Lana Yakimchuk, Presiding Officer

**APPENDIX "A"**

**DOCUMENTS RECEIVED AND CONSIDERED BY THE CARB:**

<b>NO.</b>	<b>ITEM</b>
1.	C1 - Complainant's Disclosure - 32 pages
2.	R1 – Respondent Disclosure - 75 pages

**APPENDIX 'B'**

**ORAL REPRESENTATIONS**

<b>PERSON APPEARING</b>	<b>CAPACITY</b>
1. Grayson Sharples	Complainant Agent, MNP LLP
2. Brady Gillies	Assessor, City of Lethbridge
3. Tessa Brady	Assessor, City of Lethbridge