



TEXAS DEPARTMENT OF LICENSING & REGULATION

Enforcement Division • PO Box 12157 • Austin, Texas 78711 • (512) 539-5600 • Fax (512) 539-5698

www.tdlr.texas.gov

November 1, 2021

CHANDLER B CROUCH



Re: Complaint filed against you, Case #PTC20220001854/ Tracking #s 123514, 124004, & 124267

Dear Chandler Crouch:

The Texas Department of Licensing and Regulation (the Department) has received a complaint against you. The complaint has been opened for investigation and assigned case number PTC20220001854. A copy of the complaint is enclosed with this letter.

The case has been assigned to Investigator Robert Nino, who will be contacting you for information. You may contact Investigator Nino by email at: Robert.Nino@tdlr.texas.gov, by phone at (210) 838-0042, or mail at TDLR-Enforcement Division, P.O. Box 12157, Austin, TX 78711. Please provide your case number on all correspondence.

A brief description of the Department's complaint policies and procedures can be found on our website at <http://www.tdlr.texas.gov/investigation.htm>. If you cannot access this information or you would like a copy mailed to you, please call the Enforcement Division at 512-539-5600.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Sanchez".

Jessica Sanchez
Intake Legal Assistant
Enforcement Division

Enclosure: Copy of complaint (to addressee only)

10-27-2021 07:51:05

On-Line (Web) Complaints

Tracking Number TRACK0124267

Explanation

October 26, 2021

Property – 11913 Bexley Dr.

CAD account #

Complaint – Charge also delivered VIA certified mail receipt 7009 3410 0001 2279 6199

Chandler Crouch, Property Tax Consultant (TDLR # 12363), through his misrepresentation of facts and abuse of his dual positions as both a Property Tax Consultant and a Licensed Texas Realtor/Broker intentionally misled members of the Tarrant Appraisal Review Board (TARB) with his testimony in a "market value" protest hearing on October 11, 2021.

The protest hearing on 10/11/21 referenced above was for the property located at 11913 Bexley Dr. (CAD account number 42030283), in Burleson Texas. At the time of the TARB hearing the subject property had been listed for sale, and sold, by Mr. Crouch, the Broker/Realtor, for \$352,000 on 05/28/2021. (See attached Trulia Sale Document) Mr. Crouch is also the authorized tax agent for all property tax matters for the property located at 11913 Bexley Dr. (See Attached Appointment of Agent Form). In this hearing the CAD representative presented recent sales in the subject neighborhood with an indicated market value of \$273,045 (See attached CAD Comparables Report). The \$273,045 was easily supported by the sales comps presented by TAD. Despite the fact that Mr. Crouch had full knowledge that the property sold for \$352,000 he submitted an affidavit to the TARB requesting a reduction in value. His affidavit attempted to discredit the evidence submitted by TAD by making inappropriate and misleading adjustments for the appearance that 11913 Bexley is an inferior property to the sales comps presented by TAD and worth only \$267,819. His requested value of \$267,819 for a property he sold for \$352,000 is truly a mockery of Section 23.01(a) of the Property Tax Code, "Except as otherwise provided by this chapter, all taxable property is appraised at the market value as of January 1".

In the TARB hearing Mr. Crouch, the Property Tax Consultant, testified under oath that the "market value" of the property should be reduced to \$267,819. (See attached TARB worksheet) He never once disclosed the fact that the home sold on 05/28/2021 for \$352,000 or that he was also the listing agent. This is at best a misrepresentation of the truth and at worst, unethical and certainly lacks transparency on his part.

As the facts are brought to light on this situation Mr. Crouch will bring shame to the Texas Association of Property Tax Consultants, Texas Department of Licensing and Regulation, Institute for Professionals in Taxation and the Texas Property Tax Industry as a whole.

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As the Registered Property Tax Consultant for 22,000 plus property owners in Tarrant County, Mr. Crouch files thousands of protests annually that he cannot possibly responsibly and properly represent. The property at 11913 Bexley Dr. is only one example of the mockery of the current tax system he continues to make at the expense of other taxpayers in Tarrant County. There are many other misrepresentations of properties that he serves as both the tax consultant and the commissioned broker that will also be disclosed as needed.

Factors for Consideration:

Seriousness

Misrepresentations of fact in TARB hearings to achieve unwarranted value reductions by Mr. Crouch will likely continue only to promote his name and real estate brokerage. Mr. Crouch's actions do in-fact create equity issues and inconsistent market values for all taxpayers in Tarrant County. These tactics and his continued mockery and criticism of the property tax system should not be allowed. I believe these actions warrant a thorough and serious investigation on the part of your agency.

As a licensed Property Tax Consultant Mr. Crouch is required to conduct business according to a Code of Ethics as follows: **PROPERTY TAX CONSULTANTS CODE OF ETHICS** Texas Occupations Code, Chapter 1152 requires that registrants read and submit to a code of ethics. This requirement is part of the Property Tax Consultants registration application.

Rule 66.20 (f) reads as follows: (f) Individuals who are registered under Texas Occupations Code, Chapter 1152 shall certify that the registrant has read and submits to the code of ethics as follows:

(f) (4) shall not engage in any activity that constitutes dishonesty, fraud, or gross incompetency while performing property tax consulting services;

(f) (10) shall not knowingly furnish inaccurate, deceitful, or misleading information to a client or employer, prospective client or employer or to a public agency or representative of a public agency;

Respectfully,

10-20-2021 08:00:55

On-Line (Web) Complaints

Tracking Number TRACK0124004

Explanation

October 19, 2021

Complaint – Charge (Also delivered VIA certified mail receipt 7009 3410 0001 2279 6182)

Chandler Crouch, Property Tax Consultant (TDLR # 12363), through his misrepresentation of facts and abuse of his dual positions as both a Property Tax Consultant and a Licensed Texas Realtor/Broker continues to intentionally mislead Tarrant County taxpayers and members of the Tarrant Appraisal Review Board (TARB) with his testimony in 2021 "market value" protest hearings.

As authorized agent, Mr. Crouch has filed 22,056 +- protests for Tarrant County property owners in 2021. Of these 22,056 +- accounts he protested, he has appeared in person to present evidence before the TARB for only approximately 730 properties. For the remaining 21,326 +- properties, Mr. Crouch has filed sworn affidavits containing more than 191,000 pages of evidence for Tarrant Appraisal District (TAD) to process and image. Most of the affidavits submitted by Mr. Crouch contain false testimony accusing TAD of "violating Uniform Standard of Professional Appraisal Practice (USPAP) standards". Mr. Crouch's only intent is to discredit TAD staff and TAD evidence hoping to mislead and confuse the TARB into accepting his opinion of value that is usually well below the current market value of the property. As proof of his false statements of TAD violating USPAP standards, I will provide a small sample of the affidavits for two property records that Mr. Crouch presented to the TARB in 2021 as examples of these inflammatory and false accusations. There are literally thousands of other examples that can be provided if requested.

8644 Ben Hogan Ln –
7615 Watercrest Ln –

The Facts

The purpose of USPAP is to promote and maintain a high level of public trust in appraisal practice by establishing requirements for appraisers. Promotion and preservation of the public's trust is an integral part in appraisal practice and an appraiser has an obligation not to misrepresent his or her role when providing valuation services that are outside appraisal practice. TAD is, in fact, in full compliance with USPAP Standard 5 & 6 that is universally identified as the mass appraisal standards rule and is also in complete compliance with requirements of the Property Tax Code as well. Should Mr. Crouch be allowed to advertise that TAD is "violating Uniform Standard of Professional Appraisal Practice (USPAP) standards"?

Section 6.05(i) PTC, is the requirement that all appraisal districts must develop a scope of work, as required by USPAP. The Biennially Reappraisal Plan is the district's scope of work for a mass appraisal assignment. To ensure adherence with generally accepted appraisal practices, the board of directors of an appraisal district shall develop biennially a written plan (Copy of TAD's Adopted Plan Provided) for periodic reappraisal of all property within the boundaries of the district according to the requirements

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of Section 25.18 of the Property Tax Code (PTC). Again, should Mr. Crouch be allowed to advertise that TAD is "violating Uniform Standard of Professional Appraisal Practice (USPAP) standards"?

USPAP Standard Rule 5-4 requires the development of models that are essential to credible mass appraisal results as well as the use of recognized techniques for calibrating mass appraisal models. (Refer to 2020 Mass Appraisal Report, Page 14 to 24) Again, should Mr. Crouch be allowed to advertise that TAD is "violating Uniform Standard of Professional Appraisal Practice (USPAP) standards"?

TAD's Biennial 2019-2020 Reappraisal was approved by the TAD Board of Directors on 08/14/2020 and is posted on TAD's website for public view. (Refer to TAD Biennial Reappraisal Plan approved by the TAD Board of Directors 8/14/2020)

Additionally, The Texas Comptroller of Public Accounts, Glen Hegar, conducts a biennial Methods and Assistance Program (MAP) on all 252 Appraisal Districts in Texas. TAD has historically passed the MAP review every year it has been conducted. In the most recent MAP Review conducted in 2020, (Copy Provided) TAD passed the review in accordance with Tax Code 5.102(a) and related Comptroller Rule 9.301. Every single requirement or category of the MAP review was passed by TAD including the "Appraisal Standards, Procedures and Methodology". Again, should Mr. Crouch be allowed to advertise that TAD is "violating Uniform Standard of Professional Appraisal Practice (USPAP) standards"?

As the facts are brought to light on this situation Mr. Crouch will bring shame to the Texas Association of Property Tax Consultants, Texas Department of Licensing and Regulation, Institute for Professionals in Taxation and the Texas Property Tax Industry as a whole.

Factors for Consideration:**Seriousness**

Misrepresentations of fact in TARB hearings to achieve unwarranted value reductions by Mr. Crouch will likely continue only to promote his name and real estate brokerage

10-06-2021 07:49:12

On-Line (Web) Complaints

Tracking Number TRACK0123514

Explanation

October 5, 2021

Property – 7308 John McCain Rd.
 CAD account # -
 Complaint – Charge

Chandler Crouch, Property Tax Consultant (TDLR #12363), through his misrepresentation of facts and abuse of his dual positions as both a Property Tax Consultant and a Licensed Texas Realtor/Broker intentionally misled members of the Tarrant Appraisal Review Board (TARB) with his testimony in a "market value" protest hearing on June 16, 2021.

The protest hearing on 6/16/21 referenced above was for the property located at 7308 John McCain Rd, (CAD account number 07721064), in Colleyville Texas. At the time of the TARB hearing the subject property was listed for sale by Mr. Crouch, the Broker/Realtor, for \$2,530,000. (See attached Chandler Crouch Facebook listing) Mr. Crouch is also the authorized tax agent for all property tax matters for the property located at 7308 John McCain Rd. (See Attached Appointment of Agent Form). In this hearing the CAD representative presented recent sales in the subject neighborhood with an indicated market value of \$1,123,844 (See attached CAD Comparables Report).

In the TARB hearing Mr. Crouch, the Property Tax Consultant, testified under oath that the "market value" of the property was \$882,000. (See attached TARB worksheet) He never once disclosed the fact that the home was currently listed for sale for \$2,530,000 by Mr. Crouch, the Realtor, during his sworn testimony before the TARB (See attached Facebook listing). This is at best a misrepresentation of the truth and at worst, unethical and certainly lacks transparency on his part. One of the basic principles of the National Association of Realtors Code of Ethics is: "avoid exaggeration, misrepresentation, and concealment of pertinent facts" (See attached Basic Principles of the NAR Code of Ethics).

In the TARB hearing Mr. Crouch did present misleading testimony that 7308 John McCain Rd. suffered \$31,812 of "water damage" as his justification for requesting a value reduction to \$882,000 from the 2021 CAD notified value of \$1,090,164 (See attached Property Value Notice) for a property worth more than \$2,000,000. This alleged water damage he presented as justification for a value reduction to the TARB is not listed in the seller's disclosure document that as the listing broker, Mr. Crouch had privity to during the June 2021 TARB hearing. It is also my opinion that any damage from water to the property occurred after the January 1, 2021 assessment date and should not have been presented or considered in the TARB hearing. Mr. Crouch was fully aware of this fact and chose instead to mislead the TARB panel that the water damage existed on January 1, 2021.

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As the facts are brought to light on this situation Mr. Crouch will bring shame to the Texas Association of Property Tax Consultants, Texas Department of Licensing and Regulation, Institute for Professionals in Taxation and the Texas Property Tax Industry as a whole.

As the Registered Property Tax Consultant for 20,000 plus property owners in Tarrant County, Mr. Crouch files thousands of protests annually that he cannot possibly responsibly and properly represent. The property at 7308 John McCain is only one example of the mockery of the current tax system he continues to make at the expense of other taxpayers in Tarrant County. There are many other misrepresentations of properties that he serves as both the tax agent and the commissioned broker that will also be disclosed as needed.

Factors for Consideration:

Seriousness

Misrepresentations of fact in TARB hearings to achieve unwarranted value reductions by Mr. Crouch will likely continue only to promote his name and real estate brokerage. Mr. Crouch's actions do in-fact create equity issues and inconsistent market values for all taxpayers in Tarrant County. Additionally, 7308 John McCain will most likely sell at a value far greater than the \$882,000 Mr. Crouch testified to before the TARB and will potentially harm Tarrant CAD in the annual property value performance study conducted by the Texas Comptroller's Office. These tactics and his continued mockery and criticism of the property tax system should not be allowed. (I believe these actions warrant a thorough and serious investigation on the part of your agency.

66.100. Code of Ethics and Professional Responsibility. (Amended effective February 1, 2006, 31 TexReg487)

(j) A registrant shall not knowingly furnish inaccurate, deceitful, or misleading information to a client or employer, a prospective client or employer, or a public agency or representative of a public agency.

Respectfully,

Attachments:

2021 Property Value Notice – 7308 John McCain Rd.
 Recording of Tarrant ARB Hearing – 7308 John McCain Rd.
 CAD Worksheet – TARB Hearing – 7308 John McCain Rd.
 Chandler Crouch Affidavit of Evidence – 7308 John