

ENFORCEMENT ACTION AGAINST	§	BEFORE THE
COLUMBIA RENAISSANCE SQUARE II, L.P.	§	TEXAS DEPARTMENT OF
WITH RESPECT TO COLUMBIA	§	HOUSING AND COMMUNITY
RENAISSANCE SQUARE II SENIOR	§	AFFAIRS
(HTC FILE # 18018 / CMTS # 5406)	§	

AGREED FINAL ORDER

General Remarks and official action taken:

On this 9th day of April, 2026, the Governing Board (Board) of the Texas Department of Housing and Community Affairs (TDHCA or Department) considered the matter of whether enforcement action should be taken against **COLUMBIA RENAISSANCE SQUARE II, L.P.**, a Texas limited partnership (Respondent).

This Agreed Order is executed pursuant to the authority of the Administrative Procedure Act (APA), Tex. Gov't Code §2001.056, which authorizes the informal disposition of contested cases. In a desire to conclude this matter without further delay and expense, the Board and Respondent agree to resolve this matter by this Agreed Final Order. The Respondent agrees to this Order for the purpose of resolving this proceeding only and without admitting or denying the findings of fact and conclusions of law set out in this Order.

Upon recommendation of the Enforcement Committee, the Board makes the following findings of fact and conclusions of law and enters this Order:

WAIVER

Respondent acknowledges the existence of their right to request a hearing as provided by Tex. Gov't Code §2306.044, and to seek judicial review, in the District Court of Travis County, Texas, of any order as provided by Tex. Gov't Code §2306.047. Pursuant to this compromise and settlement, the Respondent waives those rights and acknowledges the jurisdiction of the Board over Respondent.

FINDINGS OF FACT (FOF)

Jurisdiction:

1. In 2018, Respondent was awarded an allocation of Low Income Housing Tax Credits by the Board to build and operate Columbia Renaissance Square II Senior (Property) (HTC file No. 18018 / CMTS No. 5406).

2. Respondent signed a land use restriction agreement (LURA) regarding the Property. The LURA was dated as of December 16, 2021, and filed of record on December 30, 2021, at Document Number D221378745 of the Official Public Records of Real Property of Tarrant County, Texas.
3. Respondent is subject to the regulatory authority of TDHCA.

Compliance Violations¹:

4. The Department conducted an on-site monitoring review on July 15, 2025, to determine whether Respondent was in compliance with LURA requirements to lease units to low-income households and maintain records demonstrating eligibility, along with other requirements relating to marketing, services, and leasing. The monitoring review found violations of the LURA and TDHCA rules. Notifications of noncompliance were sent; however, the following violations were not resolved before the extended corrective action deadline of December 15, 2026:
 - a. Respondent failed to provide evidence of affirmative marketing to veterans, a violation of Addendum B to the LURA and 10 TAC §10.801 (Affirmative Marketing), which require developments to market to veterans through direct marketing or contracts with veterans organizations. Partial documentation was received after intervention by the Enforcement Committee, but the submission did not include sufficient documentation to reasonably confirm that development was carrying out veterans marketing. This finding remains uncorrected.
 - b. Respondent failed to provide evidence of supportive services, a violation of Addendum B of the LURA and 10 TAC §10.619 (Monitoring for Social Services), which require nine points worth of required services. Evidence of eight points worth of services was available at the time of the onsite review², and partial documentation was received for a ninth point after intervention by the Enforcement Committee, but the development has not confirmed whether a notary is presently available at the site in order to qualify for that ninth point. This finding remains uncorrected.
 - c. Respondent failed to provide a Tenant Rights and Resources Guide and get a signed Acknowledgment for any of the files in the onsite review, a violation of 10 TAC §10.613 (Lease Requirements), which requires owners to post a laminated copy of the Guide in a common area of the leasing office and provide

¹ Within this Agreed Final Order, all references to violations of TDHCA Compliance Monitoring rules at 10 TAC Chapter 10 refer to the versions of the code in effect at the time of the compliance monitoring reviews and/or inspections that resulted in recording each violation. All past violations remain violations under the current code and all interim amendments.

² Accepted supportive services: Partnership with law enforcement (3 points), Food pantry (1 point), quarterly nutritional courses (1 point), twice monthly arts and crafts (2 points), twice monthly on-site social events (1 point)

a copy to each household during the application process and upon any subsequent change to common amenities, unit amenities, or services. Partial documentation with copies of newly signed Acknowledgments was received after intervention by the Enforcement Committee, but the submission did not include the required owner's certification confirming that this form will be implemented properly going forward. This finding remains uncorrected.

- d. Respondent failed to timely submit quarterly unit status reports for the periods from October 2020 through January 2026, a violation of 10 TAC §10.607 (Reporting Requirements), which requires quarterly unit status reports to be submitted through the Compliance Monitoring and Tracking System (CMTS) on the 10th of every January, April, July, and October. Respondent submitted the quarterly reports on December 1, 2025, and January 22, 2026, after intervention by the Enforcement Committee.
5. The following violations remain outstanding at the time of this order:
 - a. Veterans marketing violation described in FOF #4.a;
 - b. Supportive services violation described in FOF #4.b; and
 - c. TRRG violation described in FOF #4.c.

CONCLUSIONS OF LAW

1. The Department has jurisdiction over this matter pursuant to Tex. Gov't Code §§2306.041-.0503 and 10 TAC Chapter 2.
2. Respondent is a housing sponsor as that term is defined in Tex. Gov't Code §2306.004(14).
3. Pursuant to IRC §42(m)(1)(B)(iii), housing credit agencies are required to monitor for noncompliance with all provisions of the IRC and to notify the Internal Revenue Service of such noncompliance.
4. Pursuant to Tex. Gov't Code Chapter 2306, Subchapter DD and Tex. Gov't Code §2306.185, TDHCA is authorized to make Housing Tax Credit Allocations for the State of Texas and is required to monitor to ensure compliance.
5. Respondent violated Addendum B of the LURA and 10 TAC §10.801 in 2025, by failing to provide adequate evidence of marketing to veterans.
6. Respondent violated Addendum B of the LURA and 10 TAC §10.619 in 2025, by failing to provide evidence of an adequate number of supportive services.
7. Respondent violated 10 TAC §10.613 in 2025, by failing to provide a Tenant Rights and Resources Guide to tenants, and have each household sign an acknowledgment form.

8. Respondent violated 10 TAC §10.607 in 2025, by failing to provide required quarterly unit status reports.
9. Because Respondent is a housing sponsor with respect to the Property, and has violated TDHCA rules, the Board has personal and subject matter jurisdiction over Respondent pursuant to Tex. Gov't Code §2306.041 and Tex. Gov't Code §2306.267.
10. Because Respondent is a housing sponsor, TDHCA may order Respondent to perform or refrain from performing certain acts in order to comply with the law, TDHCA rules, or the terms of a contract or agreement to which Respondent and TDHCA are parties, pursuant to Tex. Gov't Code §2306.267.
11. Because Respondent has violated rules promulgated pursuant to Tex. Gov't Code §2306.053 and has violated agreements with the Agency to which Respondent is a party, the Agency may impose an administrative penalty pursuant to Tex. Gov't Code §2306.041.
12. An administrative penalty of \$10,000.00 is an appropriate penalty in accordance with 10 TAC Chapter 2.

Based upon the foregoing findings of fact and conclusions of law, and an assessment of the factors set forth in Tex. Gov't Code §2306.042 to be considered in assessing such penalties as applied specifically to the facts and circumstances present in this case, the Governing Board of the Texas Department of Housing and Community Affairs orders the following:

IT IS HEREBY ORDERED that Respondent is assessed an administrative penalty in the amount of \$10,000.00, subject to partial deferral as further ordered below.

IT IS FURTHER ORDERED that Respondent shall pay and is hereby directed to pay a \$5,000.00 portion of the assessed administrative penalty by check payable to the Texas Department of Housing and Community Affairs within thirty (30) days of the date this Agreed Final Order is approved by the Board.

IT IS FURTHER ORDERED that Respondent shall fully correct the file monitoring violations as indicated in the exhibits and submit full documentation of the corrections to TDHCA on or before May 11, 2026.

IT IS FURTHER ORDERED that if Respondent timely and fully complies with the terms and conditions of this Agreed Final Order, correcting all violations as required, the satisfactory performance under this order will be accepted in lieu of the remaining assessed administrative penalty in the amount of \$5,000.00, which will be deferred and forgiven.

IT IS FURTHER ORDERED that if Respondent fails to satisfy any conditions or otherwise violates any provision of this order, or the property is sold before the terms and conditions of this Agreed Final Order have been fully satisfied, then the remaining administrative penalty in the amount of \$5,000.00 shall be immediately due and payable to the Department. Such payment

shall be made by cashier's check payable to the Texas Department of Housing and Community Affairs upon the earlier of (1) within thirty (30) days of the date the Department sends written notice to Respondent that it has violated a provision of this Order, or (2) the property closing date if sold before the terms and conditions of this Agreed Final Order have been fully satisfied.

IT IS FURTHER ORDERED that corrective documentation must be uploaded to the Compliance Monitoring and Tracking System (CMTS) by following the instructions at this link: <https://www.tdhca.texas.gov/sites/default/files/pmcdocs/CMTSUserGuide-AttachingDocs.pdf>. After the upload is complete, an email must be sent to Ysella Kaseman at ysella.kaseman@tdhca.texas.gov to inform her that the documentation is ready for review. If it comes due and payable, the penalty payment must be submitted to the following address:

If via overnight mail (FedEx, UPS):	If via USPS:
TDHCA Attn: Ysella Kaseman 221 E 11 th St Austin, Texas 78701	TDHCA Attn: Ysella Kaseman P.O. Box 13941 Austin, Texas 78711

IT IS FURTHER ORDERED that Respondent shall follow the requirements of [10 TAC §10.406](#), and obtain approval from the Department prior to consummating a sale of the property, if contemplated.

IT IS FURTHER ORDERED that the terms of this Agreed Final Order shall be published on the TDHCA website.

[Remainder of page intentionally blank]

Approved by the Governing Board of TDHCA on April 9, 2026.

By: /s/ Leo Vasquez
Name: Leo Vasquez
Title: Chair of the Board of TDHCA

By: /s/ James Beau Eccles
Name: James Beau Eccles
Title: Secretary of the Board of TDHCA

THE STATE OF TEXAS §
§
COUNTY OF TRAVIS §

Before me, the undersigned notary public, on this 9th day of April, 2026, personally appeared Leo Vasquez, proved to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

(Seal)

/s/ Nancy Dennis
Notary Public, State of Texas

THE STATE OF TEXAS §
§
COUNTY OF TRAVIS §

Before me, the undersigned notary public, on this 9th day of April, 2026, personally appeared James Beau Eccles, proved to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

(Seal)

/s/ Nancy Dennis
Notary Public, State of Texas

STATE OF Georgia §
§
COUNTY OF Fulton §

BEFORE ME, Katrina Lankford (notary name), a notary public in and for the State of GA, on this day personally appeared James S. Grauley (person signing document), known to me or proven to me through circle one: personally known / driver's license / passport to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that (he/she) executed the same for the purposes and consideration therein expressed, who being by me duly sworn, deposed as follows:

1. My name is James S. Grauley, I am of sound mind, capable of making this statement, and personally acquainted with the facts herein stated.
2. I hold the office of Manager and CEO for Respondent. I am the authorized representative of Respondent, owner of the Property, which is subject to a Land Use Restriction Agreement monitored by the TDHCA in the State of Texas, and I am duly authorized by Respondent to execute this document.
3. The Taxpayer ID for Respondent is [REDACTED].
4. The mailing address for Respondent is [REDACTED].
5. Respondent knowingly and voluntarily enters into this Agreed Final Order, and agrees with and consents to the issuance and service of the foregoing Agreed Order by the Governing Board of the Texas Department of Housing and Community Affairs.

RESPONDENT:

COLUMBIA RENAISSANCE SQUARE II, L.P., a Texas limited partnership

COLUMBIA RENAISSANCE SQUARE PARTNERS II, LLC, a Georgia limited liability company, its general partner

NEW COLUMBIA RESIDENTIAL, LLC, a XXXX limited liability company, its managing member

By: /s/ James. S. Grauley

Name: James. S. Grauley

Title: Manager and CEO

Given under my hand and seal of office this 7th day of May, 2026.

/s/ Katrina H. Lankford
Signature of Notary Public

Katrina H. Lankford
Printed Name of Notary Public

NOTARY PUBLIC IN AND FOR THE STATE OF Georgia

My Commission Expires: 09/07/2026

Exhibit 1

File Monitoring Violation Resources and Instructions

Resources:

1. Refer to the following link for all references to the rules at 10 TAC §10 that are referenced in this Order:
[http://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=10&sch=F&rl=Y](http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=10&sch=F&rl=Y)
2. Refer to the following link for copies of forms that are referenced below:
<https://www.tdhca.texas.gov/compliance-forms>
3. **All corrections must be submitted via CMTS:** See link for steps to upload documents
<https://www.tdhca.texas.gov/sites/default/files/pmcdocs/CMTSUserGuide-AttachingDocs.pdf>

Instructions: Submit all of the following documentation via CMTS. Do not refer TDHCA staff to look at past CMTS uploads; each of the following must stand alone as a complete corrective submission.

1. Veterans Marketing:

- a. **If sending marketing materials to recipients by mail:** Send marketing letters to local veterans organizations via USPS, with the send date at the top, addressed to a local veterans organization, with a marketing flyer attached. Provide copies of all of these documents to TDHCA; OR
 - b. **If sending marketing materials to recipients by email:** Send marketing emails to local veterans organizations, with marketing flyers attached. Unless it is clear from the email address, also include a cover letter to TDHCA explaining the recipients. i.e. What is the organization's name? Are they local? And if the organization's name doesn't say "veterans", how does this organization serve veterans? Provide copies of all of these documents to TDHCA.
- 2. Supportive Services:** TDHCA has previously accepted eight points worth of services, including: Partnership with law enforcement (3 points), Food pantry (1 point), quarterly nutritional courses (1 point), twice monthly arts and crafts (2 points), twice monthly on-site social events (1 point). One more point is required.
- a. If a notary is currently provided at the Property: Provide details regarding when the notary is available, and copies of documents such as flyers advertising the notary service to residents; OR
 - b. If a notary is not provided, implement an alternate supportive service that is worth one or more points from the list of services at Addendum B of the LURA. You may not receive duplicate points for the previously accepted services noted above.

3. **Tenant Rights and Resources Guide:** Present each household with the Tenant Rights and Resources Guide, have them sign the acknowledgment page, and place the executed acknowledgment in each file. Submit to the Department an owner certification that these actions have been taken and that going forward, the development will comply with the requirements of 10 TAC §10.613(l).