



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.texas.gov

Greg Abbott
GOVERNOR

BOARD MEMBERS

Leo Vasquez, *Chair*
Kenny Marchant, *Vice Chair*
Cindy Conroy, *Member*
Anna Maria Farias, *Member*
Holland Harper, *Member*
Ajay Thomas, *Member*

September 25, 2026

*Writer's direct phone # (512) 475-4047
Email: Kendall.kauten@tdhca.texas.gov*

IRG Rollingbrook LLC
Christopher Donnelly
New York, NY
cdonnelly@iliadrealty.com

RE: Aria at Rollingbrook

Dear Aria at Rollingbrook Owner:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Housing Facility Corporation (HFC) Audit Report submitted by Lauren Cohodes on July 31, 2026. This review was performed as required by Section 394.9027 (b) of Chapter 394, the Texas Administrative Code (TAC) Chapter 10, Subchapter J, for Cameron County Housing Finance Corporation. Enclosed is a copy of the Audit Report summary.

Events of noncompliance have been identified and detailed in the attached Findings Report with required corrective action. In accordance with TAC Section 394.9027(d) a copy of this notice will be sent to the Chief Appraiser of the appraisal district in which the development is located.

This notice begins the corrective action period. Supply all required documentation via Serv-U, no later than **March 24, 2027**, the last day of the corrective action period.

If you need a Serv-U account, email hfc@tdhca.texas.gov. Submissions must include a cover letter explaining, in detail, how each event of noncompliance was corrected.

Remaining uncorrected noncompliance after the corrective action period deadline will result in a referral to the Texas Comptroller and Chief Appraiser, with a recommendation for loss of ad valorem tax exemption under Section 394.905 of the Texas Local Government Code for the Tax Year being Audited.

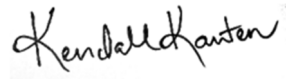


221 East 11th Street P.O. Box 13941 Austin, Texas 78711-3941 (800) 525-0657 (512) 475-3800



If you have any questions about this monitoring report, please contact Kendall Kauten toll free in Texas at (800) 643-8204, directly at (512) 475-4047, or email: Kendall.Kauten@tdhca.texas.gov.

Sincerely,



Kendall Kauten
Compliance Monitor

CC: econ.dev@cpa.texas.gov; ptad.cpa@cpa.texas.gov; info@affordable-cs.com;
cheridan.mcintyre@capstonemanagement.com; cdonnelly@iliadrealty.com;
sofia.benavides@co.cameron.tx.us; joey.lopez@co.cameron.tx.us; dagarza@co.cameron.tx.us;
gus.ruiz@co.cameron.tx.us; louri.tijerina@srsre.com; mark.yates@co.cameron.tx.us

Audit Report
Aria at Rollingbrook

The Texas Department of Housing and Community Affairs provides the following Technical Assistance:

- TAC §10.1203(3)(B) requires that all Audit Reports include contact information for all Responsible Parties. The Audit Report did not contain the contact information for the board members of the HFC Sponsor. Ensure current contact information for all Responsible Parties is provided in the Audit Report

Texas Department of Housing and Community Affairs Housing Finance Corporation (HFC) Preliminary Summary of Audit							
This is a preliminary summary of the Audit Report. TDHCA's review is ongoing and not final. Findings and any required Corrective Action will be addressed in the official Monitoring Report Letter, if applicable.							
Reporting Details							
Report Due Date:	6/1/2026	Current Reporting Year:	2026	Occupancy Period Begin Date:	1/1/2025	Occupancy Period End Date:	12/31/2025
Development & Regulatory							
HFC Property Name	Aria at Rollingbrook	Is the Regulatory Agreement (RA) is properly recorded?	Yes	PRE or POST May 28, 2025 Development?	PRE		
HFC Property Street Address	1700 Rollingbrook Drive	Regulatory Agreement Effective Date	05/07/2025	Development Type	Acquisition		
HFC City, State Zip	Baytown, TX 77521	Does the development participate in other affordable programs?	No	Occupancy Type	General/Family		
Property County	Harris	Jurisdictional Boundaries	Outside Sponsor Boundaries	Total Number of Units in the Development (ALL Restricted & Unrestricted,	240		
HFC User Name	IRG Rollingbrook LLC	If Outside Sponsor Boundaries, was the Development acquired by Sept. 1, 2025?	Yes				
		If Outside Sponsor Boundaries, has approval been obtained or is the Development in the transition period?	Yes				
Affordability Requirements - AMI Percentage by Bedroom Size (Post Developments Only)							
	Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Total	
20% AMI Units	0	0	0	0	0	0	
30% AMI Units	0	0	0	0	0	0	
40% AMI Units	0	0	0	0	0	0	
50% AMI Units	0	0	0	0	0	0	
60% AMI Units	0	16	6	2	0	24	
65% AMI Units	0	0	0	0	0	0	
70% AMI Units	0	0	0	0	0	0	
80% AMI Units	0	63	23	10	0	96	
100% AMI Units	0	0	0	0	0	0	
120% AMI Units	0	0	0	0	0	0	
140% AMI Units	0	63	24	9	0	96	
Other AMI Units (Add % here)	0	0	0	0	0	0	
Market Units	0	142	53	31	0	226	
Total Restricted Units	0	142	53	21	0	216	
Total Units (Restricted + Market)	0	156	60	24	0	240	
Development Contacts							
Organization Name	City, State Zip						
Property Name	Baytown, TX 77521						
Texas Comptroller	Austin, TX 78753						
Appraisal District	Harris County Appraisal District						
Individual Auditor	Lauren Cohodes						
HFC User	IRG Rollingbrook LLC						
HFC Management Company	Capstone Real Estate Services, Inc.						
HFC Sponsor	Not provided						
HFC Governing Body of Sponsor	Not provided						
Auditor Qualifications & Affiliations							
Does the Auditor have a current Certified Occupancy Specialist (COS) or equivalent certification?				Yes			
Has the Auditor provided a resume demonstrating housing compliance audit experience?				Yes			
Is the Auditor free from any financial, ownership, or management interest in the Development or any Responsible Parties?				Yes			
Is the Auditor currently serving, or has the Auditor previously served, as the Management Agent for this Development?				NA			
Has the HFC User complied with the three-year rotation and, if applicable, the two-year cooling-off requirement?				Yes			
Income & Rents Limits							
Does the Regulatory Agreement specify income limits?				Yes			
Are the income limits adjusted for household size?				NA			
Are the income limits based on HUD income limits?				Yes			
Did the Development comply with the Available Unit Rule when a household became over-income?				Yes			
Does the Regulatory Agreement specify rent limits for Restricted Units?				NA			
Are the rent limits based on HUD rental limits?				NA			
Are restricted unit rents ≤30% of the applicable income limit (adjusted for household size)?				NA			
Are rent limit adjusted for family size, as determined by HUD?				NA			
What is the family-size adjustment specified by the Development's Regulatory Agreement?				NA			
Units & Occupancy							
Restricted Units Occupied by Voucher Holders	0	Restricted Occupied Units	189	Non-Restricted Occupied Units	24		
Total Units (ALL)	240	Restricted Vacant Units	27	Non-Restricted Vacant Units	0		
		Total Restricted Units	216	Total Non-Restricted Units	24		
Triggering Events: Acquisition and Ownership Transfer							
Did a triggering event occur during the reporting period or any prior Tax Year?				No			
Set Asides							
Date first occupied by one or more tenants?	Not provided						
Is the Development currently in lease up?	No						
Do Restricted Units have comparable square footage and floor plans as Non-Restricted Units?	NA						
Are Restricted Units equal in finishes and equipment to Non-Restricted units?	NA						
Do Restricted Units have equal amenity and program access as Non-Restricted Units?	NA						
Are Restricted Units proportionally distributed by unit type and income category?	NA						
Did the Auditor receive photographic evidence and written certification confirming unit comparability?	NA						
Set-Aside - Select Only One Option							
Option 1:							
At least 10% of units reserved for HH not earning more than 60% AMI		NA					
At least 40% of units reserved for HH not earning more than 80% AMI		NA					
Option 2:							
At least 10% of units reserved for HH not earning more than 50% AMI		NA					
At least 40% of units reserved for HH not earning more than 100% AMI		NA					
Audit Sample Summary							
Audit Sample		Item					
Overall Sample meets minimum requirements?		NO					
Move-In Sample meets minimum requirements?		NO					
Recertification Sample meets minimum requirements?		NO					
Is the Development currently in lease-up?		No					
Texas Department of Housing and Community Affairs (TDHCA) Observations - DEPARTMENT USE ONLY							
Preliminary summary. TDHCA review is ongoing and not final.							
Report Due Date:	6/1/2026	Current Reporting Year:	2026	Audit Received Date:	7/31/2026		
PRELIMINARY COMPLIANCE INDICATORS							
Reporting							
Is the Development required to submit an Audit Report?				Yes			
Did the Development submit an Audit Report by the deadline, with approved extensions?				Yes			
Does the Audit Report cover the full prior reporting year ending December 31 and include a rent roll for the same period?				Yes			
Does the Audit Report include contact information for all Responsible Parties?				No			
Was the Audit Report submitted in the Department-prescribed manner through the Department's file transfer system (Serv-U/File Serve)?				Yes			
Was the annual service fee (\$35 per Restricted Unit in the sample or \$500 minimum) submitted with the Audit Report?				No			
Did the Audit Report include a one-time exemption application submitted to the Texas Comptroller's Office?				No			
Did the first Audit Report include all required supporting documentation?				Yes			
Auditor							
Does the Auditor meet independence and qualification standards and comply with applicable rotation and cooling-off requirements?				Yes			
Geographic Boundaries							
Is the Development within sponsor boundaries, or—if outside those boundaries—has required approval been obtained or is the Development within the applicable transition period?				Yes			
Overall Chapter 394 Status:				Noncompliant: Pending Corrective Action			
TDHCA Notes/Notations:				See Detailed Findings			

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION

HFC ID: AA26-101-0031
HFC User: IRG Rollingbrook LLC
Property Name: Aria at Rollingbrook
Address: 1700 Rollingbrook Drive, Baytown, TX

Regulatory Agreement Date: 05/07/2025
Audit Report Received Date: 7/31/2026
Corrective Action Due Date: 3/24/2027

Audit Report Review Date: 9/22/2026

PROGRAM: HFC

PROPERTY FINDINGS

Finding: Failure to comply with §10.1204(2)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	7/31/2026	TAC §10.1204(2) requires the file sample must contain at least 20% of the total number of Restricted Units, not to exceed 50 household files, with at least 75% of files from newly moved-in households and at least 10% from households that have recertified. The audit file sample in the Audit Report did not meet the minimum requirement. Auditor reports the required sample size of forty-four (44) household files was requested. The HFC User only produced seventeen (17) household files.	Submit to the Department for review: copies of the application(s), income and asset verifications, executed Income Certification, lease contract, and applicable lease addendums for twenty-seven (27) households that moved into income-restricted units during 2025, in accordance with TAC §10.1204(2). The owner may complete a retroactive income certification that completely and clearly documents the sources of income and assets for all household members that were in place at the time of the initial occupancy and apply income limits in effect on the move-in date. Submit to Department for review documentation to evidence the income from the assets have been verified and included in the total household eligibility, application, executed Income Certification and lease contract. Or the owner has the option to complete a new current certification using current income and assets sources and current income limits. Submit for Department review a copy of the application(s), income and evidence the income from the assets have been verified and included in the total household eligibility, and a new Income Certification form. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new qualified household	

Finding: Failure to comply with §10.1203(1)(C)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	7/31/2026	TAC §10.1203(1)(C) requires the HFC User to provide the Auditor with all required documents prior to submission of the first Audit Report, including the underwriting assessment, applicable resolutions, board meeting minutes, the Regulatory Agreement, and the one-time exemption application submitted to the Texas Comptroller's office. These documents must be submitted to the Department with the first Audit Report. The Audit Report submitted to the Department did not contain the one-time exemption application submitted to the Texas Comptroller's office.	Ensure all required documents are provided to the Auditor prior to submission of the first Audit Report for the Development. Submit to the Department a copy of the one-time exemption application submitted to the Texas Comptroller's office.	

Finding: Failure to comply with §10.1203(4)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	7/31/2026	TAC §10.1203(4) requires the HFC User to submit an annual service fee to the Department by June 1 of each year, in the amount of the greater of \$35 per Restricted Unit included in the audit sample or \$500, tendered by check, money order, payable to the Texas Department of Housing and Community Affairs. The annual service fee has not been received by the Department.	Submit the required annual service fee to the Department in accordance with TAC §10.1203(4). Payments must be paid by check or money order payable to the Texas Department of Housing and Community Affairs and either delivered to 221 E. 11th St., Austin, TX 78701, or mailed to PO Box 13941, Austin, TX 78711-3941. Payment must include the completed HFC Annual Service Fee Form, available on the Department's website: https://www.tdhca.texas.gov/housing-finance-corporation-compliance-monitoring	