



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*

October 9, 2026

*Writer's direct phone # (512) 475-3907
Email: Christina.Thompson@tdhca.texas.gov*

Phil Christian
Waterford Property Company
Newport Beach, CA
pchristian@waterfordco.com

RE: Axis Kessler Park

Dear Waterford Property Company:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Housing Facility Corporation (HFC) Audit Report submitted by Kelly Prejean on August 30, 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 Axis Kessler Park. 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 **April 7, 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 Christina Thompson toll free in Texas at (800) 643-8204, directly at (512) 475-3907, or email: christina.thompson@tdhca.texas.gov.

Sincerely,



Christina Thompson
Team Lead, HFC and PFC Monitoring

CC: Kelly.Prejean@auxanocompliance.com ; chad.west@dallas.gov; jesse.moreno@dallas.gov; zarin.gracey@dallas.gov; maxie.johnson@dallas.gov; jaime.resendez@dallas.gov; laura.cadena@dallas.gov; adam.bazaldua@dallas.gov; lorie.blair@dallas.gov; paula.blackmon@dallas.gov; katherine.stewart@dallas.gov; william.roth@dallas.gov; cara.mendelsohn@dallas.gov; gay.willis@dallas.gov; paul.ridley@dallas.gov ; econ.dev@cpa.texas.gov ; christine.dorsett@greystar.com ; aaron@dallashfc.com ; axiskesslerparkmgr@greystar.com

Audit Report
Axis Kessler Park

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. Audit Report did not contain contact information for the HFC Sponsor and the HFC Sponsor Governing Board. 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: Axis Kessler Park		Is the Regulatory Agreement (RA) is properly recorded? Yes		PRE or POST May 28, 2025 Development? PRE					
HFC Property Street Address: 2400 Fort Worth Ave		Regulatory Agreement Effective Date: 8/7/2024		Development Type: Acquisition					
HFC City, State Zip: Dallas, TX 75211		Does the development participate in other affordable programs? No		Occupancy Type: General/Family					
HFC Property County: Dallas		Jurisdictional Boundaries: Within Sponsor Boundaries		Total Number of Units in the Development (ALL Restricted & Unrestricted): 299					
HFC User Name: Waterford Property Company		If Outside Sponsor Boundaries, was the Development acquired by Sept. 1, 2025? NA							
		If Outside Sponsor Boundaries, has approval been obtained or is the Development in the transition period? NA							
Affordability Requirements - AMI Percentage by Bedroom Size (Post Developments Only)									
	Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Total			
60% AMI Units	0	36	19	5	0	50			
65% AMI Units	0	0	0	0	0	0			
70% AMI Units	0	0	0	0	0	0			
80% AMI Units	0	83	30	4	0	117			
100% AMI Units	0	0	0	0	0	0			
120% AMI Units	0	0	0	0	0	0			
140% AMI Units	0	71	28	6	0	105			
Other AMI Units (Add % here)	0	0	0	0	0	0			
Market Units	0	13	11	3	0	27			
Total Restricted Units	0	180	77	15	0	272			
Total Units (Restricted + Market)	0	193	88	18	0	299			
Development Contacts									
Organization Name		City, State Zip							
Property Name: Axis Kessler Park		Dallas, TX 75211							
Texas Comptroller		Not Provided							
Appraisal District: Dallas County Appraisal District		Austin, TX 78753							
Individual Auditor: Kelly Prejean		Dallas, TX 75248							
HFC User: Waterford Property Company		Rowlett, TX 75089							
HFC Management Company: Graystar		Newport Beach, CA 92660							
HFC sponsor: Not Provided		Southlake, TX 76092							
HFC Governing Body of sponsor: Not Provided		Not Provided							
		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 Party?				Yes					
Is the Auditor currently serving, or has the Auditor previously served, as the Management Agent for this Development?				No					
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?				Yes					
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?				Yes					
Are the rent limits based on HUD rental limits?				Yes					
Are restricted unit rents ≤30% of the applicable income limit (adjusted for household size)?				Yes					
Are rent limit adjusted for family size, as determined by HUD?				Yes					
What is the family-size adjustment specified by the Development's Regulatory Agreement?				1.5 Persons per Bedroom					
Units & Occupancy									
Restricted Units Occupied by Voucher Holders: 0		Restricted Occupied Units: 229		Non-Restricted Occupied Units: 23					
Total Units (ALL): 299		Restricted Vacant Units: 43		Non-Restricted Vacant Units: 4					
		Total Restricted Units: 272		Total Non-Restricted Units: 27					
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? Unknown									
Is the Development currently in lease up? No									
Do Restricted Units have comparable square footage and floor plans as Non-Restricted Units? Yes									
Are Restricted Units equal in finishes and equipment to Non-Restricted units? Yes									
Do Restricted Units have equal amenity and program access as Non-Restricted Units? Yes									
Are Restricted Units proportionally distributed by unit type and income category? Yes									
Did the Auditor receive photographic evidence and written certification confirming unit comparability? Yes									
Marketing									
Does the Development's website include information about the Development and its compliance with Section 394.9026(c)(7)?				Yes					
Does the website include Housing Choice Voucher (HCV) acceptance policies?				Yes					
The Development affirmatively markets both Restricted and non-Restricted Units to Housing Choice Voucher (HCV) households and notify local housing authorities of their acceptance of HCV tenants.				Yes					
Vouchers									
Does the HFC User refrain from refusing to rent to households solely due to participation in the Housing Choice Voucher (HCV) program?				Yes					
Do leasing and screening policies avoid any provision that prohibits or discourages HCV participation?				Yes					
Does the Development avoid imposing a minimum income requirement on HCV households exceeding 250% of the tenant-paid portion of rent?				Yes					
If an HCV household occupies a Restricted Unit and the voucher payment standard is below the approved rent, is the household charged only the allowable difference?				Yes					
Did the Auditor review evidence of HCV marketing material consistent with Sections 394.9026?				Yes					
How many Restricted Units are occupied by HCV (Section 8) households?				0					
Lease & Policies									
Does the Development provide tenants with at least 30 days' written notice of non-renewal?				Yes					
Do lease agreements prohibit tenants from waiving required protections?				Yes					
Do Restricted Unit lease agreements prohibit retaliation against tenants or the tenant's guests for taking action because the tenant established, attempted to establish, or participated in a tenant organization?				Yes					
Does the lease restrict non-renewals to major violations, failure to provide required income information, or repeated disruptive violations affecting livability, safety, quiet enjoyment, management, or finances (including late rent)?				NA					
Audit Sample Summary									
		Audit Sample		Item					
		Overall Sample meets minimum requirements?		YES					
		Move-In Sample meets minimum requirements?		YES					
		Recertification Sample meets minimum requirements?		YES					
		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: 8/30/2026					
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?				Yes					
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?				No					
Auditor									
Does the Auditor meet independence and qualification standards?				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?				Within Boundary					
				Noncompliant: See Detail Findings Report					
Overall Chapter 394 Status: TDHCA Notes/Notations:				None					

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION REPORT

HFC ID: AA26-057-0004
HFC User: Waterford Property Company
Property Name: Axis Kessler Park
Address: 2400 Fort Worth Ave Dallas, TX 75211

Regulatory Agreement Date: 8/7/2024
Audit Report Received Date: 8/30/2026
Corrective Action Due Date: 4/7/2027

Audit Report Review Date: 10/8/2026

PROGRAM: HFC

PROPERTY FINDINGS

Finding:	Failure to comply with §10.1203(1)(C)			
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	6/1/2026	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.	Submit to the Department a copy of the one-time exemption application submitted to the Texas Comptroller's office.	