



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.texas.gov

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September 25, 2026

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

William Hancock
Brazos Trinity Oaks, LLC
Benbrook, TX
whancock@brazosresidential.com

RE: Lawson

Dear Lawson Owner:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Housing Facility Corporation (HFC) Audit Report submitted by Thomas Bahr on July 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 Pecos 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.

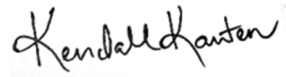


221 East 11th Street P.O. Box 13941 Austin, Texas 78711-3941 (800) 525-0657 (512) 475-3800



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; twinklescc@pecostx.gov;
aaronacc@pecostx.gov; hcarrascocc@pecostx.gov; rgrahamcc@pecostx.gov; vtrujillocc@pecostx.gov;
jroberts@brazosresidential.com ; whancock@brazosresidential.com; pecospha@earthlink.net;
mflores@brazosres.com

Audit Report
Lawson

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	Lawson Apartments	Is the Regulatory Agreement (RA) properly recorded?	Yes	PRE or POST May 28, 2025 Development?	POST		
HFC Property Street Address	5608 Royal Ln	Regulatory Agreement Effective Date	12/6/2024	Development Type	Acquisition		
HFC City, State Zip	Benbrook, TX, 76109	Does the development participate in other affordable programs?	No	Occupancy Type	General/Family		
Property County	Tarrant	Jurisdictional Boundaries	Outside Sponsor Boundaries	Total Number of Units in the Development (ALL Restricted & Unrestricted)	166		
HFC User Name	Brazos Trinity Oaks, 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	0	0	0	0	0	
65% AMI Units	0	0	0	0	0	0	
70% AMI Units	0	0	0	0	0	0	
80% AMI Units	0	34	42	7	0	83	
100% AMI Units	0	0	0	7	0	0	
120% AMI Units	0	0	0	0	0	0	
140% AMI Units	0	27	33	6	0	66	
Other AMI Units (Add % here)	0	0	0	0	0	0	
Market Units	0	2	9	1	0	12	
Total Restricted Units	0	61	75	13	0	149	
Total Units (Restricted + Market)	0	68	84	14	0	166	
Development Contacts							
Organization Name	City, State Zip						
Property Name	Benbrook, TX, 76109						
Texas Comptroller	Not provided						
Appraisal District	Tarrant County Appraisal District						
Individual Auditor	Not provided						
HFC User	Brazos Trinity Oaks, LLC						
HFC Management Company	Brazos Residential Management						
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?				Unknown			
Has the Auditor provided a resume demonstrating housing compliance audit experience?				No			
Is the Auditor free from any financial, ownership, or management interest in the Development or any Responsible Party?				Unknown			
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)?				NA			
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	90	Non-Restricted Occupied Units	10		
Total Units (ALL)	166	Restricted Vacant Units	59	Non-Restricted Vacant Units	7		
		Total Restricted Units	149	Total Non-Restricted Units	17		
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	Set-Aside - Select Only One Option					
Is the Development currently in lease up?	No	Option 1:					
Do Restricted Units have comparable square footage and floor plans as Non-Restricted Units?	Yes	At Least 10% of units reserved for HH not earning more than 60% AMI					
Are Restricted Units equal in finishes and equipment to Non-Restricted units?	Yes	At least 40% of units reserved for HH not earning more than 80% AMI					
Do Restricted Units have equal amenity and program access as Non-Restricted Units?	Yes	Option 2:					
Are Restricted Units proportionally distributed by unit type and income category?	Yes	At Least 10% of units reserved for HH not earning more than 50% AMI					
Did the Auditor receive photographic evidence and written certification confirming unit comparability?	Yes	At least 40% of units reserved for HH not earning more than 100% AMI					
Audit Sample Summary							
Audit Sample		Item					
Overall Sample meets minimum requirements?		YES					
Move-In Sample meets minimum requirements?		YES					
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			
Does 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?				Yes			
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?			
				No			
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			
TDHCA Notes/Notations:				Corrective Action			
				See Detailed Findings			

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION

HFC ID: AA26-220-0001
HFC User: Brazos Trinity Oaks, LLC
Property Name: Lawson Apartments
Address: 5608 Royal Ln, Benbrook, TX

Regulatory Agreement Date: 12/6/2024
Audit Report Received Date: 7/30/2026
Corrective Action Due Date: 3/24/2027

Audit Report Review Date: 9/23/2026

PROGRAM: HFC

PROPERTY FINDINGS

Finding: Failure to comply with §10.1203				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	7/30/2026	TAC §10.1203 requires no later than June 1 or each year, with approved extensions, an HFC User must submit to the Department an Audit Report completed by an qualified Auditor, obtained at the expense of the HFC User. The qualification of the Auditor must be submitted with each Audit Report. Qualifications must include experience auditing housing compliance, a current Certified Occupancy Specialist (COS) certification or an equivalent certification, and resume. The Auditor may not be affiliated with or related to any Responsible Parties. Additionally, a current or previous Management Agent that has or had oversight of the Development or is/was responsible for reviewing and approving tenant files does not qualify as an Auditor under these rules. The Audit Report submitted to the Department does not identify a qualified 3rd party Auditor as completing the Audit Report.	Submit for Department review the identity and qualifications of the 3rd party Auditor who completed the report submitted to the Department on July 30, 2026. If the Audit Report was not completed by a qualified 3rd party Auditor. Engage a qualified auditor to complete the full Audit Report and submit to the Department for review. The audit must be completed by a qualified 3rd party auditor using the Department's required forms. Auditor qualification requirements are provided in the TAC §10.1203 Reporting Requirements on the website. If needed, a list of Auditors is provided on the Department's website for your convenience: https://www.tdhca.texas.gov/housing-finance-corporation-compliance-monitoring	

Finding: Failure to comply with §10.1203(1)(C)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	7/30/2026	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 Regulatory Agreement.	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 Regulatory Agreement.	