



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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October 23, 2026

Writer's direct phone # (512) 475-4065
Email: shay.erickson@tdhca.texas.gov

Eric Savir
PRE SMTX Propco, LLC
Austin, TX 78701
esavir@palladius.com

RE: The Lodge Apartments

Dear Eric Savir:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Housing Facility Corporation (HFC) Audit Report submitted by Stephanie Naquin on September 25, 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 PRE SMTX Propco, LLC. 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 21, 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 Shay Erickson toll free in Texas at (800) 643-8204, directly at (512) 475-4065, or email: shay.erickson@tdhca.texas.gov.

Sincerely,



Shay Erickson
Compliance Monitor

CC: stephanie.naquin@novoco.com; russell.best1@assetliving.com; aaguirre@pleasantontx.gov; mayor@pleasantontx.gov; district1@pleasantontx.gov; district2@pleasantontx.gov; district3@pleasantontx.gov; district4@pleasantontx.gov; district5@pleasantontx.gov; district6@pleasantontx.gov; info@hayscad.com; econ.dev@cpa.texas.gov

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: The Lodge Apartments		Is the Regulatory Agreement (RA) properly recorded? Yes		PRE or POST May 28, 2025 Development? PRE					
HFC Property Street Address: 1975 Aguilera Springs Drive		Regulatory Agreement Effective Date: 1/14/2025				Development Type: Acquisition			
HFC City, State Zip: San Marcos, Texas 78666		Does the development participate in other affordable programs? No				Occupancy Type: Student			
Property County: Hays		Jurisdictional Boundaries: Outside Sponsor Boundaries				Total Number of Units in the Development (All Restricted & Unrestricted): 696			
HFC User Name: PRE SMTX Propco, LLC		If Outside Sponsor Boundaries, has approval been obtained or is the Development in the transition period? Yes							
		If Outside Sponsor Boundaries, was the Development acquired by Sept. 1, 2025? NA							
Affordability Requirements - AMI Percentage by Bedroom Size (Post Developments Only)									
	Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Total			
80% AMI Units	0	0	0	0	0	348			
160% AMI Units	0	0	0	0	0	279			
Market Units	0	0	0	0	0	69			
Total Restricted Units	0	0	0	0	0	627			
Total Units (Restricted + Market)	0	0	0	0	0	696			
Development Contacts									
Organization Name: City, State Zip		City, State Zip: San Marcos, Texas 78666							
Property Name: The Lodge Apartments		Texas Comptroller: Austin, TX 78753							
Texas Comptroller: Texas Comptroller		Appraisal District: Hays County Central Appraisal District							
Appraisal District: Hays County Central Appraisal District		Individual Auditor: Stephanie Naquin							
Individual Auditor: Stephanie Naquin		HFC User: PRE SMTX Propco, LLC							
HFC User: PRE SMTX Propco, LLC		Austin, TX 78701							
HFC Management Company: Asset Living		Houston, TX 77024							
HFC Sponsor: City of Pleasanton		Pleasanton Housing Finance Corporation							
Board Member: Pleasanton Housing Finance Corporation									
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									
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? NA									
Does the Regulatory Agreement specify rent limits for Restricted Units? Yes									
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: N/A for Reporting YR 2025		Restricted Occupied Units: 161		Non-Restricted Occupied Units: 505					
Total Units (ALL): 696		Restricted Vacant Units: 30		Non-Restricted Vacant Units: 0					
		Total Restricted Units: 191		Total Non-Restricted Units: 505					
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? N/A - Acquisition Date as of January 14, 2025									
Is the Development currently in lease up? Yes									
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?		Yes							
Recertification Sample meets minimum requirements?		No							
Is the Development currently in lease-up?		Yes							
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: 9/25/2026					
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? Yes									
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? 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? 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? NA									
Overall Chapter 394 Status: Noncompliant									
TDHCA Notes/Notations: Corrective Action Issued									

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION

HFC User: PRE SMTX Propco, LLC
 Property Name: The Lodge Apartments
 Address: 1975 Aquarena Springs Drive
 San Marcos, Texas 78666

Regulatory Agreement Date: 1/14/2025
 Corrective Action Report Issued: 10/23/2026
 Corrective Action Due Date: 4/21/2027

PROGRAM: HFC

PROPERTY FINDINGS

Finding: Failure to comply with §10.1204(2)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	9/25/2026	<p>TAC §10.1204(2) requires the Auditor to use the Department's HFC monitoring forms available on the website. 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.</p> <p>The Development reported that it is not currently in lease-up and there is a total of 191 Restricted Units; therefore, the required minimum sample size was 39 household files. The Audit Report included only 33 household files and did not meet the required minimum sample size.</p>	<p>Ensure that the file sample meets TAC §10.1204(2). Submit a revised Audit Report with a minimum of 39 household files, including at least 75% from newly moved-in households and at least 10% from households that have recertified. If fewer than 10% have recertified, include the households that have recertified.</p> <p>Submit at least six (6) additional household files and any additional files necessary to meet the sample requirements. For each additional file, submit the application, income and asset verifications, executed Income Certification, lease contract, and applicable lease addenda.</p> <p>If a selected file does not contain a compliant income certification, the Owner may complete a retroactive certification using income and asset sources in place at initial occupancy and the income limits in effect on the move-in date, or complete a new certification using current income, assets, and income limits. Submit the applicable supporting documentation and executed Income Certification. If the household has moved out or is not income eligible, occupy the unit, or another comparable unit, with a new qualified household.</p>	

Finding: Failure to comply with §10.1203(4)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	9/25/2026	<p>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.</p> <p>The Department received an annual service fee of \$1,155 for the Development. Based on the required audit sample size of 33 household files, the correct annual service fee is \$1,365. Therefore, an additional \$210 is due.</p>	<p>To correct, submit the remaining balance of \$210 toward the \$1,365 annual service fee to the Department in accordance with TAC §10.1203(4).</p> <p>Payments must be made 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.</p> <p>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.</p>	