THE STATE OF TEXAS

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.texas.gov

September 18, 2026

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

Roger Geib
Spanish Pueblo Leasehold LLC
Lake Park, FL 33403
roger@electracapital.com

RE: Nova (Spanish Pueblo)

Dear Roger Geib:

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 Spanish Pueblo Leasehold 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 **March 17, 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.

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: info@affordable-cs.com; lcohodes@affordable-cs.com; jfranklin@electracapital.com; tryals@mayfairmgt.com; cityadministrator@cityoflavilla.org; rosaperez@cityoflavilla.org; bettyrodriguez@cityoflavilla.org; criseldamunoz@cityoflavilla.org; mariolopez@cityoflavilla.org; jorgelopez@cityoflavilla.org; citysecretary@cityoflavilla.org; jesusrodriguez@cityoflavilla.org; pubrel@dcad.org; econ.dev@cpa.texas.gov

Audit Report
Nova (Spanish Pueblo)

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

- TAC §10.1203(3)(B) requires all Audit Reports to include contact information for all Responsible Parties. The Audit Report did not include complete contact information for all Responsible Parties. Specifically, complete contact and address information for the Housing Finance Corporation (HFC), HFC User, and members of the HFC Governing Body of the Sponsor was missing. Ensure that current and complete contact information for all Responsible Parties is provided in future Audit Report submissions.

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	Nova (Spanish Pueblo)
HFC Property Street Address	9703 Dale Crest Drive
HFC City, State Zip	Dallas, TX
Property County	Dallas
HFC User Name	Spanish Pueblo Leasehold LLC
Is the Regulatory Agreement (RA) is properly recorded?	Yes
Regulatory Agreement Effective Date	04/21/2025
Does the development participate in other affordable programs?	No
Jurisdictional Boundaries	Outside Sponsor Boundaries
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?	NA
PRE or POST May 28, 2025 Development?	PRE
Development Type	Acquisition
Occupancy Type	General/Family
Total Number of Units in the Development (ALL Restricted & Unrestricted)	223

Affordability Requirements - AMI Percentage by Bedroom Size (Post Developments Only)

	Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Total
80% AMI Units	15	84	103	0	0	202
140% AMI Units	1	3	3	0	0	7
Market Units	0	0	14	0	0	14
Total Restricted Units	16	87	106	0	0	209
Total Units (Restricted + Market)	16	87	120	0	0	223

Development Contacts

	Organization Name	City, State Zip
Property Name	Nova (Spanish Pueblo)	Dallas, TX
Texas Comptroller	Texas Comptroller of Public Accounts	Austin, TX 78753
Appraisal District	Dallas County Appraisal District	Dallas, TX 75247
Individual Auditor	Lauren Cohodes	Beverly Hills, CA 90210
HFC User	Spanish Pueblo Leasehold LLC	Lake Park, FL 33403
HFC Management Company	Mayfair	Dallas, TX 75254
HFC Sponsor	City of La Villa, Texas - La Villa HFC	City of La Villa, Texas - La Villa HFC
HFC Governing Body of Sponsor	La Villa City Commission - La Villa HFC	La Villa City Commission - La Villa HFC

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?	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?	NA
What is the family-size adjustment specified by the Development's Regulatory Agreement?	NA

Units & Occupancy

Restricted Units Occupied by Voucher Holders	0
Total Units (ALL)	223
Restricted Occupied Units	191
Restricted Vacant Units	18
Total Restricted Units	209
Non-Restricted Occupied Units	14
Non-Restricted Vacant Units	0
Total Non-Restricted Units	14

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?	5/25/1905
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?	Yes
Recertification Sample meets minimum requirements?	NA
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?	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 & Technical Assistance Issued

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION

HFC User: Spanish Pueblo Leasehold LLC
Property Name: Nova (Spanish Pueblo)
Address: 9703 Dale Crest Drive
Dallas, TX 75220

Corrective Action Report Issued: 9/18/2026
Corrective Action Due Date: 3/17/2027

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 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. The Development reported a total of 209 Restricted Units; therefore, the required minimum sample size was 42 household files. The Audit Report included only 41 household files and did not meet the required minimum sample size.	Ensure that the file sample meets TAC §10.1204(2). Submit a revised Audit Report with a minimum of 42 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. Submit at least one (1) additional household file 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. 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.	

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 Department received an annual service fee of $1,435 for the Development. Based on the required audit sample size of 42 household files, the correct annual service fee is $1,470. Therefore, an additional $35 is due.	To correct, submit the remaining balance of $35 toward the $1,470 annual service fee to the Department in accordance with TAC §10.1203(4). 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. Payment must include the completed HFC Annual Service Fee Form, available on the Deparment's website: https://www.tdhca.texas.gov/housing-finance-corporation-compliance-monitoring.	