



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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July 11, 2025

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

Erick Waller
The Baldwin Apartments, LP
Cleveland, OH
Ewaller@nrpgroup.com

RE: The Baldwin at St. Paul Square

Dear Erick Waller:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Public Facility Corporation (PFC) Audit Report submitted by Murphy HTC, LLC on May 29, 2025. This review was performed as required by Section 303.042 (c) of Chapter 303, the Texas Administrative Code Chapter 10, Subchapter I, and the Regulatory Agreement/Deed Restriction for The Baldwin at St. Paul Square.

Events of noncompliance have been identified and corrective action is required. The attached Findings Report details the event(s) of noncompliance and the required corrective action. This notice begins the corrective action period. Please supply all requested documentation no later than **September 9, 2025**, the last day of the corrective action period.

If clarification is necessary to complete the corrective action, contact us as soon as possible. If it is not possible to provide the requested documentation by the corrective action period, correct as much as you can and submit a corrective action plan detailing how and when the remaining issue(s) of noncompliance will be corrected.

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,

A handwritten signature in black ink, appearing to read "Shay Erickson", with a long horizontal flourish extending to the right.

Shay Erickson
PFC Monitor

CC: patricia@murphyhtc.com



Audit Report
The Baldwin at St. Paul Square

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

- Section 3(c) of the Regulatory Agreement requires the Development to obtain, complete, and maintain on file Income Certifications from each Low-Income Household, using the form provided in Exhibit D. This certification must be dated prior to the household's initial occupancy. The file sample revealed the following issues: one (1) file was missing the Exhibit D form, one (1) was not dated, and one (1) contained a certification completed after the initial occupancy date. Please ensure all Income Certifications are properly completed, dated, and retained in compliance with Section 3(c).
- Section 3(f) requires each lease or rental agreement for a Low-Income Unit to include a provision stating that the Grantor relied on the tenant's Income Certification and supporting documentation to determine eligibility, and that any material misstatement may result in immediate lease termination. It must also disclose that the tenant's income is subject to annual recertification. The file sample revealed two (2) files that were missing the required language in the lease itself or as an addendum.
- Annual income also includes all income derived from assets as identified and calculated in accordance with 24 CFR § 5.609(a). All income and asset sources must be properly verified and documented to ensure full compliance. Moving forward, failure to verify and document assets will result in a finding of noncompliance. Households with assets valued at \$51,600 or less may utilize the Asset Certification of Net Family Assets form found on the Department's website here: [Compliance Forms | Texas Department of Housing and Community Affairs](#) or a comparable form.

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DETAIL FINDINGS AND CORRECTIVE ACTION

PFC ID: A24-015-0012
PFC User: The NRP Group
Property Name: The Baldwin at St. Paul Square
Address: 239 Center Street, San Antonio TX 78205

Regulatory Agreement Date: 9/25/2019
Audit Report Received Date: 5/29/2025
Corrective Action Due Date: 9/9/2025

Audit Report Review Date: 6/27/2025

PROGRAM: PFC

PROPERTY FINDINGS

Finding: Household above the income limit				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
233	5/18/2024	The household's military income, specifically the Basic Allowance for Subsistence (BAS), was excluded from their gross annual income; however, income must be calculated in accordance with Exhibit D of the Development's Regulatory Agreement and the HUD Handbook 4503.3, which do not permit the exclusion of BAS. When BAS is included, the household's annual gross income totals \$81,087.60, exceeding the applicable 80% AMI income limit of \$70,200.	To correct, designate unit 233 to a non-program unit since their income exceeds the 80% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 80% AMI limit. Owner may survey existing vacant non-program units to replace unit 233 and reserve as a program-unit to be occupied with a household that income qualifies at 80% AMI. Submit documentation to the Department that the unit is vacant and a statement that it is reserved to be occupied by a Low-Income Household. Or if the household's circumstances have changed, the owner may certify them under current circumstances using current income limits. If verifying under current circumstances, submit a copy of the household file, application, verification of income and assets, executed Income Certification and lease agreement.	

Finding: Household above income limit				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
127	7/26/2022	Department unable to establish eligibility. The tenant file for Unit 127 includes two household members. The application indicates income from both the Air Force and employment as a hygienist; however, the file contains income documentation only for the Air Force. No income verification was provided for the hygienist employment. The Auditor reports that household income could not be determined or verified at initial occupancy or recertification.	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 for Department review a copy of the application(s), income and asset verifications, an new executed Income Certification, and a lease agreement from the time of move-in. 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 asset verifications, a new executed Income Certification, and a lease agreement. 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. Submit copies of the application(s), income and asset verifications, an executed Income Certification and lease agreement to the Department for review.	