



## TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

[www.tdhca.texas.gov](http://www.tdhca.texas.gov)

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July 3, 2025

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*Email: shay.erickson@tdhca.texas.gov*

PFC Contact  
Culebra Commons (Culebra Commons 2019, LLC)  
San Antonio, TX  
[cucman@lynd.com](mailto:cucman@lynd.com)

RE: Culebra Commons (Culebra Commons 2019, LLC)

Dear PFC Contact:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Public Facility Corporation (PFC) Audit Report submitted by Premier Compliance Consulting on June 2, 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 Culebra Commons (Culebra Commons 2019, LLC).

No event(s) of noncompliance were identified during the review. Please note that although no event(s) of noncompliance were identified, only a sample of information provided to the Department was reviewed for the purposes of this report. It is the Public Facility Corporation User's responsibility to maintain compliance.

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](mailto: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: [nicole@premiercomplianceconsulting.com](mailto:nicole@premiercomplianceconsulting.com); [yvette@premiercomplianceconsulting.com](mailto:yvette@premiercomplianceconsulting.com)



## **Audit Report**

### **Culebra Commons (Culebra Commons 2019, LLC)**

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 an Income Certification for 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 two (2) files were missing a signed copy of Exhibit D, and thirty-one (31) files contained certifications listing incorrect income limits. Please ensure that Exhibit D is fully completed, accurately reflects the correct income limits, and is properly signed and dated to maintain compliance.
- 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 one (1) file that was missing the required language in the lease itself or as an addendum.
- In accordance with Exhibit D, income and assets for all household members must be verified and documented. The file sample revealed one (1) file in which only one household member had income verified. Please ensure that income verification and documentation is obtained for every household member to maintain compliance.
- 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.