



## TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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August 12, 2025

*Writer's direct phone # (512) 475 -3907*  
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2500 Woodland Park Tenant, LP  
Dallas, Texas  
[brs@ojaraholdings.com](mailto:brs@ojaraholdings.com)

RE: Milano Apartments

Dear 2500 Woodland Park Tenant, LP:

The Texas Department of Housing and Community Affairs (Department) has reviewed the Public Facility Corporation (PFC) Audit Report submitted by Christopher McDonald on June 4, 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 Milano Apartments.

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 **October 11, 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.

The Department recommends submitting a cover letter explaining the documentation submitted to address each event of noncompliance. Submit corrective action to [pfc.monitoring@tdhca.texas.gov](mailto:pfc.monitoring@tdhca.texas.gov).



If you have any questions about this monitoring report, please contact Christina Thompson toll free in Texas at (800) 643-8204, directly at (512) 475-3907, or email: [christina.thompson@tdhca.texas.gov](mailto:christina.thompson@tdhca.texas.gov).

Sincerely,

A handwritten signature in black ink, appearing to be 'CT' followed by a long horizontal flourish.

Christina Thompson  
PFC Monitor

CC: [Christopher.McDonald@aprio.com](mailto:Christopher.McDonald@aprio.com)

**Audit Report**  
Milano Apartments

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

- Audit Report submitted to the Department did not contain accurate information. The unit occupancy information provided on the report did not reflect the information shown on the rent roll. The total unit count of the Development was also not accurate on the report and did not match the information in the Development's Lease Agreement. Going forward, ensure accurate information is provided on the Audit Report.

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION REPORT

PFC ID: A25-101-0093  
PFC User: 2500 Woodland Park Tenant, LP  
Property Name: Milano Apartments  
Address: 2500 Woodland Park Dr, Houston, TX 77077

Regulatory Agreement Date: 9/12/2018  
Audit Report Received Date: 6/4/2025  
Corrective Action Due Date: 10/11/2025

Audit Report Review Date: 7/14/2025

PROGRAM: PFC

PROPERTY FINDINGS

Finding: Failure to comply with TAC §10.1103(6)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	6/4/2025	<p>TAC §10.1103(6) requires an audit report submission include the auditor's qualifications and resume. The qualifications of the auditor must include experience auditing housing compliance, a current Certified Occupancy Specialist (COS) or equivalent certification.</p> <p>The audit report submitted did not contain the auditor's experience, resume and the documentation as required in TAC §10.1103(6).</p>	Submit for Department review the auditor's experience, resume and proof the auditor holds the required certifications identified in TAC §10.1103(6).	

Finding: Failure to comply with §10.1103(1)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	6/4/2025	<p>An Audit Report from an Auditor must be submitted to the Department annually. This submission will satisfy the requirements by demonstrating eligibility to continue under the former law, but must fully address the requirements of identifying the difference in rent charged for income-restricted residential units and the estimated maximum market rents that could be charged for those units without the rent and income restrictions.</p> <p>The Audit Report submitted to the Department did not contain the comparison of the restricted rent to the estimated market rent on Tab 7 of the Audit Report.</p>	Submit the comparison of the restricted rent to the estimated market rent for each unit identified in Tab 7.	

Finding: Failure to comply with §10.1104(a)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	6/4/2025	<p>Audit requirements under §10.1104(a) require a detailed review of a sample of household files. The file sample size used by the Auditor must contain at least twenty percent (20%) of the total number of Restricted Units for the Development but no more than a total of fifty (50) household files. The selection of Restricted Units should primarily be new move-ins but should also include at least a ten percent (10%) sample of all the household files that have recertified.</p> <p>The total number of Restricted Units for the Development is one hundred sixty-five (165) and requires a sample size of thirty-three (33) household files. The Audit Report did not contain a file sample.</p>	<p>Engage the Auditor to complete the file review in accordance with §10.1104(a), which requires that the file sample include at least twenty percent (20%) of the total number of Restricted Units, not to exceed fifty (50) total household files. The sample must primarily consist of new move-ins and include at least a ten percent (10%) sample of households that completed a recertification.</p> <p>Submit to the Department for review an updated Tab 9 of the audit workbook for twenty-nine (29) new move-in files and at least four (4) renewal files from year 2024. Any new noncompliance identified will be addressed under separate cover.</p>	

Finding: Failure to comply with §10.1103(1)				
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	6/4/2025	<p>An Audit Report from an Auditor must be submitted to the Department annually. This submission will satisfy the requirements by demonstrating eligibility to continue under the former law.</p> <p>The Audit Report submitted to the Department does not comply with the former law requirement that fifty (50) percent of units must be reserved for occupancy by individuals and families earning less than eighty (80) percent of the area median family income. The number of restricted units at the Development was not provided as required in Tab-7 of the Audit Workbook.</p>	Submit the unit and occupancy information for the Development as identified in Tab 7.	