



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.texas.gov

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November 24, 2025

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

PFC Operator & Management
Lynd Management Group
San Antonio, TX
jgarza@lynd.com; gmeadows@lynd.com

RE: Culebra Commons

Dear PFC Operator & Management:

The Texas Department of Housing and Community Affairs (Department) received documentation on May 6, 2025, addressing the noncompliance identified during the review of the Audit Report submitted by Premier Compliance Consulting on January 22, 2025. Corrective action was due on May 6, 2025.

The documentation submitted was sufficient to correct the noncompliance related to **Failure to comply with the Public Facility Corporation Regulatory Agreement** including the requirement for a lease provision for Low-Income Units, as well as **Households above the income limit** affecting units 2-2112, 3-3203, 3-3304, and 7-7105. Please see the attached Finding Report for details.

If you have any questions, 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 Compliance Monitor

CC:yvette@premiercomplianceconsulting.com; tim@txwf.org



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION
PFC PROGRAM
Corrective Action Response

PFC User: Lynd Management Group
Property Name: Culebra Commons
Address: 7106 Culebra Cmn, San Antonio, TX 78250
RA Date: 3/2/2020

Audit Report Date: 1/22/2025
Program: PFC

Corrective Action Due Date: 5/6/2025

Audit Report Review Date: 2/25/2020

PROGRAM: PFC

PROPERTY FINDINGS

Finding	Failure to comply with the Public Facility Corporation Regulatory Agreement	Correction Date: 5/6/2025
Noncompliance Date	12/31/2023	
Reason	Section 3(f) of the Development's Regulatory Agreement states, each lease or rental agreement pertaining to a Low-Income Unit shall contain a provision to the effect that the Development has relied on the Income Certification and supporting information supplied by the Low Income Household in determining qualification for occupancy of the Low Income Unit and that any material misstatement in such certification (whether or not intentional) may be cause for immediate termination of such lease or rental agreement. Each lease or rental agreement shall also disclose that the tenant's income is subject to annual certification.	
Corrective Action	Submit to the Department for review an owner's statement of compliance with the Regulatory Agreement moving forward, along with a blank template of the Lease or Lease Addenda that includes the required language.	
Unit # 2-2112		
Finding	Household above the income limit	Correction Date: 5/6/2025
Noncompliance Date	1/22/2025	
Reason	The file was requested as part of the twenty-percent sample; however the file was not made available to the Auditor as required. Household eligibility could not be verified.	

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 3-3203

Finding

Noncompliance Date

Household above the income limit

9/22/2023

Correction Date: 5/6/2025

Reason

Employment offer letter was used to determine income at initial occupancy but the letter does not provide the hourly pay rate and number of employment hours worked. The Auditor reported the income could not be verified.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 3-3304

Finding

Noncompliance Date

Household above the income limit

1/22/2025

Correction Date: 5/6/2025

Reason

The file was requested as part of the twenty-percent sample; however the file was not made available to the Auditor as required. Household eligibility could not be verified.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 7-7105

Finding

Noncompliance Date

Reason

Household above the income limit

1/22/2025

Correction Date: 5/6/2025

The tenant file provided to the Auditor for review did not contain any income verification documentation. The Auditor reports the income eligibility could not be determined or verified.

Corrective Action

The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.



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November 24, 2025

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

PFC Sponsor
San Antonio Housing Facility Corporation
San Antonio, TX
tim@txwf.org

RE: Culebra Commons

Dear PFC Sponsor:

The Texas Department of Housing and Community Affairs (Department) received documentation on May 6, 2025, addressing the noncompliance identified during the review of the Audit Report submitted by Premier Compliance Consulting on January 22, 2025. Corrective action was due on May 6, 2025.

The documentation submitted was sufficient to correct the noncompliance related to **Failure to comply with the Public Facility Corporation Regulatory Agreement** including the requirement for a lease provision for Low-Income Units, as well as **Households above the income limit** affecting units 2-2112, 3-3203, 3-3304, and 7-7105. Please see the attached Finding Report for details.

If you have any questions, 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 Compliance Monitor

CC: jgarza@lynd.com; gmeadows@lynd.com; cucman@lynd.com; yvette@premiercomplianceconsulting.com



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION
PFC PROGRAM
Corrective Action Response

PFC User: Lynd Management Group
Property Name: Culebra Commons
Address: 7106 Culebra Cmn, San Antonio, TX 78250
RA Date: 3/2/2020

Audit Report Date: 1/22/2025
Program: PFC

Corrective Action Due Date: 5/6/2025

Audit Report Review Date: 2/25/2020

PROGRAM: PFC

PROPERTY FINDINGS

Finding	Failure to comply with the Public Facility Corporation Regulatory Agreement	Correction Date: 5/6/2025
Noncompliance Date	12/31/2023	
Reason	Section 3(f) of the Development's Regulatory Agreement states, each lease or rental agreement pertaining to a Low-Income Unit shall contain a provision to the effect that the Development has relied on the Income Certification and supporting information supplied by the Low Income Household in determining qualification for occupancy of the Low Income Unit and that any material misstatement in such certification (whether or not intentional) may be cause for immediate termination of such lease or rental agreement. Each lease or rental agreement shall also disclose that the tenant's income is subject to annual certification.	
Corrective Action	Submit to the Department for review an owner's statement of compliance with the Regulatory Agreement moving forward, along with a blank template of the Lease or Lease Addenda that includes the required language.	
Unit # 2-2112		
Finding	Household above the income limit	Correction Date: 5/6/2025
Noncompliance Date	1/22/2025	
Reason	The file was requested as part of the twenty-percent sample; however the file was not made available to the Auditor as required. Household eligibility could not be verified.	

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 3-3203

Finding

Noncompliance Date

Household above the income limit

9/22/2023

Correction Date: 5/6/2025

Reason

Employment offer letter was used to determine income at initial occupancy but the letter does not provide the hourly pay rate and number of employment hours worked. The Auditor reported the income could not be verified.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 3-3304

Finding

Noncompliance Date

Household above the income limit

1/22/2025

Correction Date: 5/6/2025

Reason

The file was requested as part of the twenty-percent sample; however the file was not made available to the Auditor as required. Household eligibility could not be verified.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 7-7105

Finding

Noncompliance Date

Reason

Household above the income limit

1/22/2025

Correction Date: 5/6/2025

The tenant file provided to the Auditor for review did not contain any income verification documentation. The Auditor reports the income eligibility could not be determined or verified.

Corrective Action

The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.



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November 24, 2025

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

PFC Community Manager
Culebra Commons (Culebra Commons 2019, LLC)
San Antonio, TX
cucman@lynd.com

RE: Culebra Commons

Dear PFC Community Manager:

The Texas Department of Housing and Community Affairs (Department) received documentation on May 6, 2025, addressing the noncompliance identified during the review of the Audit Report submitted by Premier Compliance Consulting on January 22, 2025. Corrective action was due on May 6, 2025.

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Shay Erickson
PFC Compliance Monitor

CC: jgarza@lynd.com; gmeadows@lynd.com; tim@txwf.org; yvette@premiercomplianceconsulting.com



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION
PFC PROGRAM
Corrective Action Response

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Address: 7106 Culebra Cmn, San Antonio, TX 78250
RA Date: 3/2/2020

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Corrective Action Due Date: 5/6/2025

Audit Report Review Date: 2/25/2020

PROGRAM: PFC

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Unit # 2-2112		
Finding	Household above the income limit	Correction Date: 5/6/2025
Noncompliance Date	1/22/2025	
Reason	The file was requested as part of the twenty-percent sample; however the file was not made available to the Auditor as required. Household eligibility could not be verified.	

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Unit # 3-3203

Finding

Noncompliance Date

Household above the income limit

9/22/2023

Correction Date: 5/6/2025

Reason

Employment offer letter was used to determine income at initial occupancy but the letter does not provide the hourly pay rate and number of employment hours worked. The Auditor reported the income could not be verified.

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Unit # 3-3304

Finding

Noncompliance Date

Household above the income limit

1/22/2025

Correction Date: 5/6/2025

Reason

The file was requested as part of the twenty-percent sample; however the file was not made available to the Auditor as required. Household eligibility could not be verified.

Corrective Action The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.

Unit # 7-7105

Finding

Noncompliance Date

Reason

Household above the income limit

1/22/2025

Correction Date: 5/6/2025

The tenant file provided to the Auditor for review did not contain any income verification documentation. The Auditor reports the income eligibility could not be determined or verified.

Corrective Action

The owner may complete a retroactive income certification that completely and clearly documents the sources of income/assets for all household members that were in place at the time of the initial certification and apply income limits that were in effect on the initial move-in date. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all sources of income/assets at the time of move-in. Or the owner has the option to complete a new current certification using current income/assets sources and current income limits. Submit for Department review a copy of the application(s), income/asset verifications and a new Income Certification form that clearly documents all current sources of income/assets. If the household has moved out or is not income eligible, occupy the unit or another comparable unit on the property with a new income eligible household. Submit copies of the application(s), income/asset verifications, an Income Certification, lease contract and applicable lease addendums to the Department for review.