



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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January 9, 2026

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

PFC Operator
Post Bellaire, LLC
Los Angeles, California
compliance@postinvestmentgroup.com; bknapik@postinvestmentgroup.com

RE: Estates at Bellaire

Dear PFC Operator:

The Texas Department of Housing and Community Affairs (Department) received documentation on May 13, 2025, addressing the noncompliance identified during the review of the Audit Report submitted by Novogradac & Company, LLP on January 20, 2025. Corrective action was due on May 13, 2025.

The documentation submitted was sufficient to correct the noncompliance related to **Households above the income limit** affecting units 2-2102, 4-4309, 3-3306, 5-5111, 7-7306, 11-11302, 11-11310, 12-12306, 13-13201, and 22-224, **Gross rent exceeding the highest rent allowed under the Regulatory Agreement** affecting units 13-13201 and 22-224, and **Failure to comply with the Public Facility Corporation Regulatory Agreement** affecting units 3-3204 and 4-307, including lease provisions applicable to Low-Income Units. 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".

Shay Erickson
PFC Compliance Monitor

CC:stephanie.naquin@novoco.com; president@housingforhouston.com; mayor@houstontx.gov;
mollie.kickbush@tamresidential.com; tatiana.herascaballero@tamresidential.com;
estatesbellairemgr@tamresidential.com



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION
PFC PROGRAM
Corrective Action Response

PFC User: Post Bellaire, LLC
Property Name: Estates at Bellaire
Address: 4807 Pin Oak Park, Houston, TX 77081
RA Date: 10/11/2022

Audit Report Date: 1/20/2025
Program: PFC

Corrective Action Due Date: 5/13/2025

Corrective Action Receive Date: 5/13/2025

PROGRAM: PFC

PROPERTY FINDINGS

Unit # 2-2102

Finding Household above the income limit
Noncompliance Date 8/9/2023

Correction Date: 5/13/2025

Reason In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

Corrective Action Auditor reports tenant file does not contain any income verification documents and income cannot be determined or verified.
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 # 4-4309

Finding Household above the income limit
Noncompliance Date 11/27/2023

Correction Date: 5/13/2025

Reason In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

Auditor reports tenant file does not contain any income verification documents and income cannot 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.

Unit # 12-12306

Finding

Noncompliance Date

Reason

Household above the income limit

12/15/2023

Correction Date: 5/13/2025

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

Corrective Action

Auditor reports tenant file does not contain any income verification documents and income cannot be determined or verified.

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 # 22-224

Finding

Noncompliance Date

Reason

Household above the income limit

11/11/2022

Correction Date: 5/13/2025

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

Auditor reports tenant file does not contain any income verification documents and income cannot 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.

Unit # 3-3306

Finding

Noncompliance Date

Reason

Household above the income limit

8/19/2023

Correction Date: 5/13/2025

In accordance with Section 3(c) of the Regulatory Agreement, the following items are acceptable to determine income eligibility: (1) pay stubs for the most recent four-week period; (2) income tax returns for the most recent two tax years; (3) an income verification from the applicant's current employer; (4) an income verification from the Social Security Administration; or (5) if applicant is unemployed, does not have tax returns or is otherwise unable to provide other forms of verification as required, another form of independent verification as would be satisfactory.

The tenant file only contains one (1) paystub. Auditor reports income 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.

Unit # 5-5111

Finding

Noncompliance Date

Reason

Household above the income limit

7/3/2023

Correction Date: 5/13/2025

The household indicated income was being received from employment and Veteran Affairs benefits. The inclusion of the Veteran Affairs benefits results in the household's income of \$67,147.32, exceeding the applicable 80% AMI limit at \$60,560.

Corrective Action

To correct, designate unit 5-5111 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 5-5111 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.

Unit # 7-7306

Unit # 7-7306
Finding Household above the income limit
Noncompliance Date 7/27/2023 Correction Date: 5/13/2025
Reason Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$54,329.08, which exceeds the applicable 80% AMI income limit of \$52,160.
Corrective Action To correct, designate unit 7-7306 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 7-7306 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.

Unit # 11-11302
Finding Household above the income limit
Noncompliance Date 11/25/2023 Correction Date: 5/13/2025
Reason Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$91,266.24, which exceeds the applicable 80% AMI income limit of \$67,120.
Corrective Action To correct, designate unit 11-11302 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 11-11302 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.

Unit # 11-11310
Finding Household above the income limit
Noncompliance Date 12/6/2023 Correction Date: 5/13/2025
Reason Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$47,247.12, which exceeds the applicable 60% AMI income limit of \$39,120.
Corrective Action To correct, designate unit 11-11310 to an 80% unit since their income exceeds the 60% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 60% AMI limit. Owner may survey existing vacant non-program units to replace unit 11-11310 and reserve as a program-unit to be occupied with a household that income qualifies at 60% 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.

Unit # 13-13201
Finding Household above the income limit

Noncompliance Date 12/15/2023 Correction Date: 5/13/2025
Reason Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$51,834.50, which exceeds the applicable 60% AMI income limit of \$44,760.
Corrective Action To correct, designate unit 13-13201 to an 80% unit since their income exceeds the 60% AMI limit and lease the next available unit of comparable or smaller size to a household that income qualifies at the 60% AMI limit. Owner may survey existing vacant non-program units to replace unit 13-13201 and reserve as a program-unit to be occupied with a household that income qualifies at 60% 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.

Unit # 13-13201
Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement
Noncompliance Date 12/15/2023 Correction Date: 5/13/2025
Reason Unit #13-13201 is designated as 60% AMI . The household's rent of \$1,389 exceeds the 60% AMI rent limit of \$1,258.
Corrective Action To correct, reduce the household's rent to \$1,258 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Unit # 22-224
Finding Gross rent exceeds the highest rent allowed under the Regulatory Agreement
Noncompliance Date 11/11/2022 Correction Date: 5/13/2025
Reason Unit #22-224 is designated as 60% AMI . The household's rent of \$1,278 exceeds the 60% AMI rent limit of \$1,258.
Corrective Action To correct, reduce the household's rent to \$1,258 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the follow documentation for review: the rent overage calculation, an amended lease contract reflecting the new rent amount, the household's rent ledger of the new rent amount reflected and the rent credit (if applicable) or a copy of the cancelled check (if a refund is issued).

Unit # 3-3204
Finding Failure to comply with the Public Facility Corporation Regulatory Agreement
Noncompliance Date 8/20/2023 Correction Date: 5/13/2025
Reason Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit
Corrective Action Provide the household with the completed Exhibit D Income Certification for execution. Do not backdate. Submit the Department a copy of the executed Exhibit D Income Certification for review.

Unit # 4-307
Finding Failure to comply with the Public Facility Corporation Regulatory Agreement
Noncompliance Date 12/29/2022 Correction Date: 5/13/2025

Reason Development is required to obtain, complete and maintain on file Income Certifications from each Low-Income Household, including (i) the Income Certification provided as Exhibit D, attached hereto and incorporated herein, dated prior to the initial occupancy of such Low-Income Household in the Project that occupied the unit

Corrective Action Provide the household with the completed Exhibit D Income Certification for execution. Do not backdate. Submit the Department a copy of the executed Exhibit D Income Certification for review.

Finding Failure to comply with the Public Facility Corporation Regulatory Agreement

Noncompliance Date 12/31/2023

Correction Date: 5/13/2025

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.