



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.texas.gov

Greg Abbott
GOVERNOR

BOARD MEMBERS

Leo Vasquez, *Chair*
Kenny Marchant, *Vice Chair*
Cindy Conroy, *Member*
Anna Maria Farías, *Member*
Holland Harper, *Member*
Ajay Thomas, *Member*

November 4, 2025

Writer's direct phone # (512) 475 -3907
Email: christina.thompson@tdhca.texas.gov

Josue Garza
Lynd Management Group
San Antonio, TX
jgarza@lynd.com

RE: Copper Mill (Lynd Living Parc 410 Apartments, LLC)

Dear Josue Garza:

The Texas Department of Housing and Community Affairs (Department) received documentation on September 9, 2025 addressing the noncompliance identified during the review of the Audit Report submitted by Premier Compliance Consulting on June 2, 2025. Corrective action was due on September 9, 2025.

The documentation submitted was sufficient to correct the noncompliance related to **Household above the income limit** affecting units 1512, 105, 1511 and 1607 , and **Gross rent exceeds the highest rent allowed under the Regulatory Agreement** affecting units 105, 1315, and 1201 . Please see attached Finding Report for details.

Please note, the noncompliance outlined above is considered corrected during the corrective action period. The Department considers this review closed.

The next annual Audit Report is due June 1, 2026.

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

Sincerely,

A handwritten signature in blue ink, appearing to be "CT" or "Christina".

Christina Thompson
PFC Compliance Monitor

Cc: yvette@premiercomplianceconsulting.com



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DETAIL FINDINGS AND CORRECTIVE ACTION REPORT

PFC ID: A24-015-0014
PFC User: Lynd Management Group
Property Name: Copper Mill (Lynd Living Parc 410 Apartments LLC)
Address: 5827 Northwest Loop 410, San Antonio, TX 78238

Regulatory Agreement Date: 5/31/2023
Audit Report Received Date: 6/2/2025
Corrective Action Due Date: 9/9/2025

Audit Report Review Date: 7/2/2025

PROGRAM: PFC

PROPERTY FINDINGS

Finding:	Household above the income limit			
Unit #	Compliance Date	Reason	Corrective Action	Correction Date
1512	6/2/2025	Above income limit: Annualizing weekly unemployment benefits resulted in a household annual gross income of \$68,248.13, which exceeds the applicable 60% AMI income limit of \$53,100.00. The Auditor noted that the property incorrectly calculated the income using a monthly pay frequency and should have based the calculation on a weekly pay frequency.	To correct, designate unit 1512 to an 80% AMI 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 1512 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.	9/9/2025

Finding:	Household above the income limit			
Unit #	Compliance Date	Reason	Corrective Action	Correction Date
1607	1/31/2025	Department unable to establish eligibility. The file for unit 1607 is missing income and eligibility documentation for two adult household members. The Auditor was unable to verify household income or establish eligibility in accordance with program requirements.	The owner may complete a retroactive income certification that clearly documents all sources of income and assets for both household members that were in place at the time of initial occupancy, using the income limits in effect on the move-in date. Submit to the Department a copy of the application(s), income and asset, and a new Income Certification dated as of move-in. Alternatively, the owner may complete a current certification using current income and asset sources and current income limits. In this case, submit the current application(s), income and asset verifications, and a new Income Certification to the Department for review. If the household is no longer income-eligible or has vacated the unit, the unit (or a comparable unit on the property) must be occupied by a new qualified household. Submit to the Department the new application(s), income and asset verifications, executed Income Certification, lease contract, and any applicable lease addendums for review.	9/9/2025

Finding:	Household above the income limit			
Unit #	Compliance Date	Reason	Corrective Action	Correction Date
105	6/2/2025	Department unable to establish eligibility. The household file for Unit 105 indicates that the tenant is employed; however, no documentation was provided to verify income from employment. The Auditor reported that household income could not be determined or verified.	The owner may complete a retroactive income certification that clearly documents all sources of income and assets—including employment—that were in place at the time of initial occupancy, using the income limits in effect on the move-in date. Submit to the Department a copy of the application(s), income and asset verifications, and a new Income Certification dated as of move-in. Alternatively, the owner may complete a current certification using current income and asset sources and current income limits. In this case, submit the current application(s), income and asset verifications, and a new Income Certification to the Department for review. If the household is no longer income-eligible or has vacated the unit, the unit (or a comparable unit on the property) must be occupied by a new qualified household. Submit to the Department the new application(s), income and asset verifications, executed Income Certification, lease contract, and any applicable lease addendums for review.	9/9/2025

Finding:	Household above the income limit			
Unit #	Compliance Date	Reason	Corrective Action	Correction Date
1511	6/2/2025	Above 30% income limit: Annualizing the average of the most recent paystubs for the household resulted in the household's annual gross income of \$48,117.56, which exceeds the applicable 30% AMI income limit of \$18,570.00.	To correct, designate unit 1511 to an 60% AMI unit since their income exceeds the 30% 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 1511 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.	9/9/2025

Finding:	Gross rent exceeds the highest rent allowed under the Regulatory Agreement			
Unit #	Compliance Date	Reason	Corrective Action	Correction Date
105	6/2/2025	Rent Exceeds 30% Limit: unit #105 is designated as 30% AMI. The household's rent of \$850 exceeds the 30% AMI rent limit of \$531.	To correct, reduce the household's rent to \$531 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the following 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).	9/9/2025

Finding:	Gross rent exceeds the highest rent allowed under the Regulatory Agreement			
Unit #	Compliance Date	Reason	Corrective Action	Correction Date
1315	6/2/2025	Rent Exceeds 30% Limit: unit #1315 is designated as 30% AMI. The household's rent of \$850 exceeds the 30% AMI rent limit of \$531.	To correct, reduce the household's rent to \$531 per month. Calculate the rent overage from the time of move-in, and either refund or credit the household the overpaid rent. Submit the following 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).	9/9/2025

Finding:		Gross rent exceeds the highest rent allowed under the Regulatory Agreement		
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
1201	6/2/2025	Rent Exceeds 30% Limit: unit #1315 is designated as 30% AMI. The household's rent of \$779 exceeds the 30% AMI rent limit of \$531.	To correct, reduce the household's rent to \$531 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).	9/9/2025