November 12, 2025

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

PFC Operator
2500 Woodland Park Tenant, LP Dallas, Texas
brs@ojalaholdings.com;kip@ojalaholdings.com

RE: Milano Apartments

Dear PFC Operator:

The Texas Department of Housing and Community Affairs (Department) received documentation on October 3, 2025, addressing the noncompliance identified during the review of the Audit Report submitted by Aprio, LLP on June 4, 2025. Corrective action was due on October 11, 2025.

The documentation submitted was sufficient to correct the noncompliance related to **Failure to comply with §10.1103(1)**, which requires the comparison of the restricted rent to the estimated market rent and the inclusion of unit and occupancy information on Tab 7 of the Audit Report; **Failure to comply with TAC §10.1103(6)**, which requires the submission of the auditor's experience and resume; and **Failure to comply with §10.1104(a),** which requires a sample size of thirty-three (33) household files.

The next Audit report is due June 1, 2026.

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,

Shay Erickson
PFC Compliance Monitor

CC:brs@ojalaholdings.com;legal@respropmanagement.com;president@housingforhouston.com; jproler@origin.bank; christopher.mcdonald@aprio.com

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	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. The audit report submitted did not contain the auditor's experience, resume and the documentation as required in TAC §10.1103(6).	Submit for Department review the auditor's experience, resume and proof the auditor holds the required certifications identified in TAC §10.1103(6).	Corrected Date: 10/03/2025

Finding: Failure to comply with §10.1103(1)

Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	6/4/2025	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. 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.	Submit the comparison of the restricted rent to the estimated market rent for each unit identified in Tab 7.	Corrected Date: 10/03/2025

Finding: Failure to comply with §10.1104(a)

Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	6/4/2025	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. 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.	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. 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.	Corrected Date: 10/03/2025

Finding:	Failure to comply with §10.1103(1)			
Unit #	Non-Compliance Date	Reason	Corrective Action	Correction Date
Property Wide	6/4/2025	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. 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.	Submit the unit and occupancy information for the Development as identified in Tab 7.	Corrected Date: 10/03/2025