ENFORCEMENT ACTION AGAINST LURIN	§	BEFORE THE
REAL ESTATE HOLDINGS LIX, LLC WITH	§ §	TEXAS DEPARTMENT OF
RESPECT TO THE DECLAN I	§	HOUSING AND COMMUNITY
(F/K/A HIGHLAND BLUFFS I)	§ §	AFFAIRS
(BOND MF007 / CMTS # 2510)	§	

AGREED FINAL ORDER

General Remarks and official action taken:

On this 16th day of January, 2025, the Governing Board ("Board") of the Texas Department of Housing and Community Affairs ("TDHCA" or "Department") considered the matter of whether enforcement action should be taken against **LURIN REAL ESTATE HOLDINGS LIX, LLC,** ("Respondent").

This Agreed Order is executed pursuant to the authority of the Administrative Procedure Act ("APA"), Tex. Gov't Code §2001.056, which authorizes the informal disposition of contested cases. In a desire to conclude this matter without further delay and expense, the Board and Respondent agree to resolve this matter by this Agreed Final Order. The Respondent agrees to this Order for the purpose of resolving this proceeding only and without admitting or denying the findings of fact and conclusions of law set out in this Order.

Upon recommendation of the Enforcement Committee, the Board makes the following findings of fact and conclusions of law and enters this Order:

WAIVER

Respondent acknowledges the existence of their right to request a hearing as provided by Tex. Gov't Code §2306.044, and to seek judicial review, in the District Court of Travis County, Texas, of any order as provided by Tex. Gov't Code §2306.047. Pursuant to this compromise and settlement, the Respondent waives those rights and acknowledges the jurisdiction of the Board over Respondent.

FINDINGS OF FACT (FOF)

Jurisdiction:

1. Asmara Affordable Housing, Inc. (Prior Owner) acquired multiple properties in 1996 using proceeds from NHP Foundation – Asmara Project Series 1996A Bonds. The bonds were refinanced in 2003 using NHP Foundation – Asmara Project Series 2003 Bonds to refund Series 1996, and to finance capital improvements and necessary repairs for

multiple projects in Texas, including the The Declan I (Property) (Bond File No. MF007 / CMTS No. 2510).

- 2. Prior Owner signed an Amended and Restated Regulatory and Land Use Restriction Agreement (LURA) dated as of December 1, 2003, and filed of record at Document Number 2683681 of the Official Public Records of Real Property of Dallas County, Texas (the Records). In accordance with Section 11 of the LURA, the LURA is a restrictive covenant/deed restriction encumbering the Property and binding on all successors and assigns for the full term of the LURA.
- 3. Respondent took ownership of the Property and signed an agreement with TDHCA to assume the duties imposed by the LURA and to comply fully with the terms thereof (Agreement to Assume and Comply), effective June 22, 2022, and filed the same in the Records at Document Number 202200178178, thereby binding Respondent to the terms of the LURA.
- 4. Respondent is subject to the regulatory authority of TDHCA.

<u>Compliance Violations¹</u>:

- 5. The Department conducted a file monitoring review on February 16, 2023, to determine whether Respondent complied with LURA requirements to lease units to low-income households and maintain records demonstrating eligibility. The monitoring review found violations of the LURA and TDHCA rules. Notifications of noncompliance were sent and a May 31, 2023, corrective action deadline was set, but Respondent failed to submit complete corrections and the TDHCA Compliance Division referred the following noncompliance for an administrative penalty:
 - a. Respondent failed to provide documentation that household incomes were within prescribed limits upon initial occupancy for units 132, 214, 423, 432, 723, 737, 821, 1117, 1118, and 1224, a violation of Section 4 of the LURA and 10 TAC §10.611 (Determination, Documentation and Certification of Annual Income), which require screening of tenants at initial occupancy to ensure qualification for the program. These findings are considered unresolved.
 - b. Respondent failed to provide required annual recertifications that were due between January 2023 and February 2023, for units 924, 432, 634, and 1022, a violation of Section 4(c) of the LURA and 10 TAC §10.612 (Tenant File Requirements), which require annual recertifications for each unit. These findings are considered unresolved.

¹ Within this Agreed Final Order, all references to violations of TDHCA Compliance Monitoring rules at 10 TAC Chapter 10 refers to the versions of the code in effect at the time of the compliance monitoring reviews and/or inspections that resulted in recording each violation. All past violations remain violations under the current code and all interim amendments.

- 6. The Department conducted a National Standards for the Physical Inspection of Real Estate (NSPIRE) inspection on July 8, 2024. The inspection report at Exhibit 1 showed numerous property condition violations, a violation of 10 TAC § 10.621 (Property Condition Standards). The Department issued a notification of noncompliance setting a corrective action deadline of October 20, 2024, but Respondent failed to submit corrections and the TDHCA Compliance Division referred the noncompliance for an administrative penalty.
- 7. The following violations remain outstanding at the time of this order:
 - a. Household income violations for units 132, 214, 423, 432, 723, 737, 821, 1117, 1118, and 1224, described in FOF #5a;
 - b. Annual recertification violations for units 924, 432, 634, and 1022, described in FOF #5b; and
 - c. NSPIRE violations described in FOF #6.

CONCLUSIONS OF LAW

1. The Department has jurisdiction over this matter pursuant to Tex. Gov't Code §§2306.041-.0503 and 10 TAC Chapter 2.

2. Respondent is a "housing sponsor" as that term is defined in Tex. Gov't Code §2306.004(14).

3. Pursuant to IRC §42(m)(1)(B)(iii), housing credit agencies are required to monitor for noncompliance with all provisions of the IRC and to notify the Internal Revenue Service of such noncompliance.

4. Pursuant to Tex. Gov't Code Chapter 2306, Subchapter DD and Tex. Gov't Code §2306.185, TDHCA is authorized to make Housing Tax Credit Allocations for the State of Texas and is required to monitor to ensure compliance.

5. Pursuant to 10 TAC §10.621(a), TDHCA has adopted HUD's NSPIRE as the standard for its physical inspections.

6. Respondent violated 10 TAC §10.611 and Section 4(c) of the LURA in 2023, by failing to provide documentation that household income was within prescribed limits upon initial occupancy for units 132, 214, 423, 432, 723, 737, 821, 1117, 1118, and 1224.

7. Respondents violated 10 TAC §10.612 and Section 4(c) of the LURA by failing to provide annual tenant recertifications for units 924, 432, 634, and 1022.

8. Respondent violated 10 TAC §10.621 in 2024, by failing to comply with NSPIRE when major violations were discovered and not timely corrected.

9. Because Respondent is a housing sponsor with respect to the Property, and has violated TDHCA rules, the Board has personal and subject matter jurisdiction over Respondent pursuant to Tex. Gov't Code §2306.041 and Tex. Gov't Code §2306.267.

10. Because Respondent is a housing sponsor, TDHCA may order Respondent to perform or refrain from performing certain acts in order to comply with the law, TDHCA rules, or the terms of a contract or agreement to which Respondent and TDHCA are parties, pursuant to Tex. Gov't Code §2306.267.

11. Because Respondent has violated rules promulgated pursuant to Tex. Gov't Code §2306.053 and has violated agreements with the Agency to which Respondent is a party, the Agency may impose an administrative penalty pursuant to Tex. Gov't Code §2306.041.

12. An administrative penalty of \$25,000.00 is an appropriate penalty in accordance with 10 TAC Chapter 2.

Based upon the foregoing findings of fact and conclusions of law, and an assessment of the factors set forth in Tex. Gov't Code §2306.042 to be considered in assessing such penalties as applied specifically to the facts and circumstances present in this case, the Governing Board of the Texas Department of Housing and Community Affairs orders the following:

IT IS HEREBY ORDERED that Respondent is assessed an administrative penalty in the amount of \$25,000.00, subject to partial deferral as further ordered below.

IT IS FURTHER ORDERED that Respondent shall pay and is hereby directed to pay a \$12,500.00 portion of the assessed administrative penalty by check payable to the "Texas Department of Housing and Community Affairs" within thirty days of the date this Agreed Final Order is approved by the Board.

IT IS FURTHER ORDERED that Respondent shall submit file monitoring corrective documentation as directed at Exhibit 1 to TDHCA on or before April 30, 2025.

IT IS FURTHER ORDERED that Respondent shall repair all NSPIRE violations and submit complete documentation as directed at Exhibit 3 to TDHCA on or before June 30, 2025.

IT IS FURTHER ORDERED that if Respondent timely and fully complies with the terms and conditions of this Agreed Final Order, addressing all violations as required, the satisfactory performance under this order will be accepted in lieu of the remaining assessed administrative penalty in the amount of \$12,500.00, which will be deferred and forgiven.

IT IS FURTHER ORDERED that if Respondent fails to satisfy any conditions or otherwise violates any provision of this order, or the property is sold before the terms and conditions of this Agreed Final Order have been fully satisfied, then the remaining administrative penalty in the amount of \$12,500.00 shall be immediately due and payable to the Department. Such payment shall be made by cashier's check payable to the "Texas Department of Housing and Community Affairs" upon the earlier of (1) within thirty days of the date the Department sends written

notice to Respondent that it has violated a provision of this Order, or (2) the property closing date if sold before the terms and conditions of this Agreed Final Order have been fully satisfied.

IT IS FURTHER ORDERED that corrective documentation must be uploaded to the Compliance Monitoring and Tracking System (CMTS) by following the instructions at this link: <u>https://www.tdhca.texas.gov/sites/default/files/pmcdocs/CMTSUserGuide-AttachingDocs.pdf</u>. After the upload is complete, an email must be sent to Ysella Kaseman at <u>ysella.kaseman@tdhca.texas.gov</u> to inform her that the documentation is ready for review. If it comes due and payable, the penalty payment must be submitted to the following address:

If via overnight mail (FedEx, UPS):	If via USPS:
TDHCA	TDHCA
Attn: Ysella Kaseman	Attn: Ysella Kaseman
221 E 11 th St	P.O. Box 13941
Austin, Texas 78701	Austin, Texas 78711

IT IS FURTHER ORDERED that Respondent shall follow the requirements of <u>10 TAC §10.406</u>, and obtain approval from the Department prior to consummating a sale of the property, if contemplated.

IT IS FURTHER ORDERED that the terms of this Agreed Final Order shall be published on the TDHCA website.

[Remainder of page intentionally blank]

Approved by the Governing Board of TDHCA on January 16, 2025.

By: <u>/s/ Leo Vasquez</u> Name: <u>Leo Vasquez</u> Title: <u>Chair of the Board of TDHCA</u>

By:/s/ James "Beau" EcclesName:James "Beau" EcclesTitle:Secretary of the Board of TDHCA

THE STATE OF TEXAS § § COUNTY OF TRAVIS §

Before me, the undersigned notary public, on this <u>16th</u> day of <u>January</u>, 2025, personally appeared <u>Leo Vasquez</u>, proved to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

(Seal)

<u>/s/ Nancy Dennis</u> Notary Public, State of Texas

THE STATE OF TEXAS § § COUNTY OF TRAVIS §

Before me, the undersigned notary public, on this his <u>16th</u> day of <u>January</u>, 2025, personally appeared <u>James "Beau" Eccles</u>, proved to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

(Seal)

/s/ Nancy Dennis

Notary Public, State of Texas

STATE OF TEXAS	§
	§
COUNTY OF DALLAS	§

BEFORE ME, <u>Ashley Weingartner (notary name)</u>, a notary public in and for the State of <u>Texas</u>, on this day personally appeared <u>Jon Venetos (person signing document)</u>, known to me or proven to me through <u>circle one: personally known / driver's license / passport</u> to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that (he/she) executed the same for the purposes and consideration therein expressed, who being by me duly sworn, deposed as follows:

- 1. "My name is <u>Jon Venetos</u>, I am of sound mind, capable of making this statement, and personally acquainted with the facts herein stated.
- 2. I hold the office of <u>President</u> for Respondent. I am the authorized representative of Respondent, owner of the Property, which is subject to a Land Use Restriction Agreement monitored by the TDHCA in the State of Texas, and I am duly authorized by Respondent to execute this document.
- 3. The Taxpayer ID for Respondent is ______.
- 4. The mailing address for Respondent is ______
- 5. Respondent knowingly and voluntarily enters into this Agreed Final Order, and agrees with and consents to the issuance and service of the foregoing Agreed Order by the Governing Board of the Texas Department of Housing and Community Affairs."

RESPONDENT:

LURIN REAL ESTATE HOLDINGS LIX, LLC,

By: <u>/s/ Jon Venetos</u>

Name: Jon Ven<u>etos</u>_____

Title: <u>President</u>

Given under my hand and seal of office this <u>14</u> day of <u>February</u>, 2025.

<u>/s/ Ashley Weingartner</u> Signature of Notary Public

Ashley Weingartner

Printed Name of Notary Public

NOTARY PUBLIC IN AND FOR THE STATE OF <u>Texas</u> My Commission Expires: <u>7/15/2028</u>

Exhibit 1

Instructions to Address File Monitoring Violations

Resources and important notes:

- Refer to the following link for all references below to the rules at 10 TAC §10: <u>http://texreg.sos.state.tx.us/public/readtac\$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=10&sch=F&rl=Y
 </u>
- Refer to the following link for copies of forms that are referenced below: <u>https://www.tdhca.texas.gov/compliance-forms</u>
- Exhibit 3 provides details regarding each tenant file component outlined below.
- Technical support and training presentations are available at:
 - o Trainings: <u>https://www.tdhca.texas.gov/compliance-program-training-presentations</u>
 - o Income and Rent Limits: <u>https://www.tdhca.texas.gov/income-and-rent-limits</u>
 - o FAQ's: <u>https://www.tdhca.texas.gov/compliance-frequently-asked-questions-faqs</u>
- Do not backdate any documents listed below.
- A transfer of a qualified household from another unit is not sufficient to correct any findings. If there is a tenant income certification or household income above limit violation, a transfer from another unit will simply cause the finding to transfer to that unit.

Instructions: Respondent must submit the following documentation via CMTS upload² on or before April 30, 2025:

- 1. <u>For Unit 924</u>: Respondent failed to submit the annual recertification that was due 1/23/2023.
 - a. If the Saulters household remains in this unit, complete and submit an annual recertification, including the recertification application, verifications of all sources of income and assets, tenant income certification form, and the first and signatory pages of the lease;
 - b. If the unit is currently occupied, submit a full tenant file*. The file must be complete and prove income eligibility; or
 - c. If the unit is vacant, follow the ** instructions below.
- For Unit 1022: Respondent failed to submit the annual recertification that was due 2/14/2023. The Unit Status Report appears to show that the affected household has moved out and a new household has occupied the unit.
 - a. If the unit is currently occupied, submit a full tenant file*. The file must be complete and prove income eligibility; or
 - b. If the unit is vacant, follow the ** instructions below.

² Submit via CMTS upload (see https://www.tdhca.texas.gov/sites/default/files/pmcdocs/CMTSUserGuide-AttachingDocs.pdf) to the attention of Ysella Kaseman, and then mail Ysella Kaseman at ysella.kaseman@tdhca.texas.gov upon completion to notify TDHCA that the submission is ready for review.

- 3. <u>For Units 432 and 634</u>: Respondent failed to submit annual recertifications that were due in January 2023, and later indicated that these units are vacant.
 - a. If the unit is currently occupied, submit a full tenant file*. The file must be complete and prove income eligibility; or
 - b. If the unit is vacant, follow the ** instructions below.
- 4. <u>For units 132, 214, 423, 723, 821, 1117, and 1118</u>: Respondent failed to collect required documentation to prove program eligibility at initial occupancy, and did not submit any response regarding these violations.
 - a. If the unit is currently occupied, submit a full tenant file*. The file must be complete and prove income eligibility; or
 - b. If the unit is vacant, follow the ** instructions below.
- 5. <u>For units 432, and 1224:</u> Respondent failed to collect required documentation to prove program eligibility at initial occupancy, and later indicated that these units are vacant. Perform all of the following:
 - a. If the unit is currently occupied, submit a full tenant file*. The file must be complete and prove income eligibility; or
 - b. If the unit is vacant, follow the ** instructions below.

*A full tenant file must include all of the following components.

- A. Tenant application;
- B. Verifications of all sources of income and assets;
- C. Tenant income certification;
- D. Lease and lease addendum; and
- E. Tenant Rights and Resources Guide Acknowledgment.

Remember that components A - C above must be dated within 120 days of one another.

See Exhibit 2 for details regarding how to compile each of the above full tenant file components.

****** Vacant unit instructions:

- A. Make the unit ready for occupancy and submit a letter from the owner, signed by Jon Venetos, by April 30, 2025, certifying that the unit is ready for occupancy, AND
- B. Occupy the unit by a qualified household and submit the full tenant file* within 30 days of occupancy. Receipt of the full tenant file after April 30, 2025 is acceptable for this circumstance provided that the owner's letter at Requirement A above is submitted timely.

Exhibit 2

Tenant File Guidelines

The following technical support does not represent a complete list of all file requirements and is intended only as a guide. TDHCA staff recommends that all staff responsible for accepting and processing tenant files sign up for Income Determination Training in order to get a full overview of the process. Sign up at <u>http://www.tdhca.state.tx.us/pmcomp/COMPtrain.html</u>. Forms discussed below are available at: <u>http://www.tdhca.state.tx.us/pmcomp/forms.htm</u>.

Forms discussed below are available at: <u>https://www.tdhca.texas.gov/compliance-forms</u>. A "Suggested File Checklist" is available in the "Monitoring Forms" section of "Compliance Forms for Multifamily Properties" at <u>https://www.tdhca.texas.gov/compliance-forms</u>.

Important Note The application, verifications of income and assets, and Tenant Income Certification (1 – 7 below) must be signed within 120 days of one another. If one component is outside of that time frame, you must recertify.

- 1. <u>Intake Application</u>: Each adult household member must complete their own application in order to be properly screened at initial certification. A married couple can complete a joint application. The Department does not have a required form to screen households, but we make a sample form available for that purpose. All households must be screened for household composition, income and assets, and student status. Applicants <u>must</u> complete all blanks on the application and answer all questions. Any lines left intentionally blank should be marked with "none" or "n/a." Applications must be signed and dated using the date that the form is actually completed. If you use the Texas Apartment Association (TAA) Rental Application, be aware that it does not include all requirements, but they have a "Supplemental Rental Application for Units Under Government Regulated Affordable Housing Programs" that includes the additional requirements. TDHCA also has an application for m that you can use; using our form is not required for the application, but it does screen for all requirements.
- 2. <u>Release and Consent</u>: Have tenant sign TDHCA's Release and Consent form so that verifications may be collected by the property.
- 3. <u>Verify Income</u>: Each source of income and asset must be documented for every adult household member based upon the information disclosed on the application. There are multiple methods:
 - a. Income Verification for Households with Section 8 Certificates: If you use this form, you do not need to verify income further, but you do need to collect all other components of the tenant file. The Public Housing Authority, verifying that the household is eligible at initial occupancy or at recertification, signs this form. Since the housing authority performed the necessary verifications. The form must include the following information: a certification date from the housing authority that is within 120 days of that effective date, either at initial move-in or at recertification, number of household members and the gross annual income before any adjustments. This form must also be dated within 120 days of the application and Income Certification that you collect. If the housing authority certification is outside of that period, you must verify income yourself. A housing authority may not use this form to verify income for a property in which they hold an ownership interest.
 - b. **First-hand verifications:** Paystubs or payroll printouts that show gross income. If you choose this method, ensure that you consistently collect a specified number of consecutive check stubs as defined in your management plan.

- c. **Employment Verification Form**: Part 1 must be completed by you and signed by the tenant. Part 2 must be completed by the employer. To prevent fraud, you must submit the form directly to the employer and must not allow the tenant to handle it. You should ensure that the person completing the employer portion has authority to do so and has access to all applicable information in order to verify the employment income. If you receive the verification via mail, retain the envelope. If you receive it via fax, ensure that the fax stamp is on it. If received by email, ensure the email address it was received from is evidenced and from the employer.
- d. Verification of non-employment income: You must obtain verifications for all other income sources, such as child support, social security, and/or unemployment benefits. Self-certification by the household is not acceptable. Examples: benefit verification letter(s) are acceptable for social security and/or unemployment benefits. Acceptable verifications for child support could include documents such as divorce decree(s), court order(s), or a written statement from the court or attorney general regarding the monthly awarded amount.
- e. **Telephone Verifications**: These are acceptable *only* for clarifying discrepancies and cannot be used as primary form of verification. Include your name, the date, the name of the person with whom you spoke, and your signature. These are appropriate if there is an unusual circumstance relating to the tenant file.
- f. **Certification of Zero Income:** If an adult household member does not report any sources of income on the application, this form can be used to document thorough screening and to document the source of funds used to pay for rent, utilities, and/or other necessities.
- 4. <u>Verify Assets:</u> Regardless of their balances, applicants must report all assets, including assets such as checking or savings accounts. Accounts are typically disclosed on the application form, but you must review all documentation from the tenant to ensure proper documentation of the household's income and assets. For instance, review the credit report (if you pull one), application, pay stubs, and other documents to ensure that all information is consistent. Examples of ways to find assets that are frequently overlooked: Review pay stubs for assets such as checking and retirement accounts that the household may have forgotten to include in the application. These accounts must also be verified. Format of verifications:
 - a. **First-hand verifications**, such as bank statements to verify a checking account. If using this method, the most current statement will be needed for both checking and savings accounts. MFDL programs require two months of source documentation.
 - b. **3**rd verifications Asset Verification party using the TDHCA form. As with the "Employment Verification Form" discussed above, Part 1 must be completed by you and signed by the tenant. Part 2 must be completed by the financial institution. To prevent fraud, you must submit the form directly to the employer and must not allow the tenant to handle it. You should ensure that the person completing the financial institution's portion has authority to do so and has access to all applicable information in order to verify the asset(s). If you receive the verification via mail, retain the envelope. If you receive it via fax, ensure that the fax stamp is on it, If received by email, ensure the email address it was received from is evidenced and from the financial institution.

- 5. <u>Verify Student Status</u>: Must screen for student status; can be collected on the Annual Eligibility Certification, the Certification of Student Eligibility Form, or the income Certification Form. If the household indicates they are students, there are two forms that *must* be used: the Certification of Student Eligibility form must be completed by the household, and the Student Verification form is used to verify and document their student status.
 - a. <u>With the changes from HOTMA, student income from financial assistance must be</u> <u>evaluated for inclusion/exclusion. A detailed training on this topic is available online:</u> <u>https://www.tdhca.texas.gov/compliance-program-training-presentations.</u>
- <u>Verify Special Needs</u>: This form is generally optional, but is a great way to screen households for special needs. It is required if there is a Special Needs occupancy requirement under your LURA, unless there is another form of special needs verification in the file.
- 7. <u>Tenant Income Certification Form</u>: Upon verification of all income and asset sources disclosed on the application and any additional information found in the documentation submitted by the tenant, the next step is to annualize the sources on the Income Certification Form, add them together, and compare to the applicable income limit for household size which can be found at <u>https://www.tdhca.texas.gov/income-and-rent-limits</u>. Be sure to include any income derived from assets. The form must include all household members, and be signed by each adult household member.
- 8. Lease: Must conform with your LURA and TDHCA requirements and indicate a rent below the maximum rent limits, which can be found at https://www.tdhca.texas.gov/income-and-rentlimits. Generally speaking, when determining the rent for HTC, BOND, TCEP and TCAP programs, the tenant-paid rent, plus the utility allowance, plus any mandatory fees, must be below the maximum limit set by TDHCA. 10 TAC §10.613(a) prohibits the eviction or termination of tenancy of low-income households for reasons other than good cause throughout the affordability period in accordance with Revenue Ruling 2004-82. In addition, 10 TAC §10.613(e) prohibits HTC developments from locking out or threatening to lock out any development resident, or seizing or threatening to seize personal property of a resident, except by judicial process, for purposes of performing necessary repairs or construction work, or in case of emergency. Those prohibitions must be included in the lease or lease addendum. Additionally, certain programs must include a Lead Warning Statement and the TDHCA VAWA lease addendum, per 10 TAC 10.613(f) and (h). TAA has an affordable housing lease addendum that has incorporated this required language. If you are not a TAA member, you can draft a lease addendum using the requirements outlined above. For Section 811 units, you must use the HUD Model Lease, HUD form 92236-PRA.
- <u>Written Policies and Procedures / Tenant Selection Criteria</u>: Written policies and procedures requirements are at <u>10 TAC §10.802</u>.
- 10. <u>Violence Against Women Act of 2013 (VAWA)</u>: The property is required to provide all prospective tenants the VAWA forms 5380 and 5382 at the time of application, at the time they are approved, at the time of denial, and at the time the household is given a notice to vacate or non-renewal. Forms are available at the Forms link above.
- 11. <u>Tenant Rights and Resources Guide</u>: In accordance with <u>10 TAC §10.613(I)</u>, you must customize the Guide for your property and post a laminated copy in a common area of the leasing office. Development must also provide a copy of the guide to each household during the application process and upon any subsequent changes to the items described at paragraph b) below. The guide includes:

- a. Information about Fair Housing and tenant choice; and
- b. Information regarding common amenities, unit amenities, and services.

Additionally, a representative of each household must receive a copy of the guide and sign an acknowledgment of receipt of the brochure prior to, but no more than 120 days prior to, the initial lease execution date. A copy of the signed acknowledgment must be maintained in the tenant file.

Exhibit 3

NSPIRE Report and Instructions to Address NSPIRE Violations

Respondent must repair every violation listed in the attached inspection report, and then submit the following evidence of each repair via CMTS upload³ on or before June 30, 2025:

- For repairs completed by in-house staff: Respondent may either (A) generate work orders by Building or Unit for all deficiencies found in that area, or (B) generate a separate work order for each deficiency. In both cases, work orders must include <u>all</u> of the following:
 - a. <u>The location of the deficiency</u>, i.e. Bldg. 5 Unit 502 or Site- near outside gate, etc;
 - b. <u>Description of the deficiency</u>, i.e. Damaged Doors, Hardware, locks Bedroom door won't latch properly. Site-Hazards Other- Broken Glass;
 - c. <u>How the deficiency was repaired</u>. Just a few quick words are sufficient, i.e. "replaced bedroom door latch" or "adjusted bedroom door latch". "Removed broken glass." "Sheetrock repair, taped, floated, and painted". Conversely, words such as "fixed" "done", "complete" are inadequate and are NOT acceptable;
 - d. The date the deficiency was corrected; and
 - e. <u>The signature of the person who either performed the repair or acknowledges that the</u> <u>repair was performed satisfactorily</u>. This is very important. Someone must certify that the correction was acceptably completed.
- 2. <u>For repairs completed by outside vendors</u>, such as concrete repairs, roofing, etc.: Submit the scope of work and a dated invoice by the vendor.
- 3. <u>For pest control violations</u>: Submit a pest control invoice by a licensed contractor that includes the treatment date, contractor signature, units treated, and the type of pest treated. The Structural Pest Control Act (Chapter 1951 of the Occupations Code) requires licensing of businesses and individuals that perform structural pest control for hire. Additionally, persons performing pest control at an apartment building must be licensed.
- 4. <u>Organization of corrections</u>: All work orders and invoices must be organized in the same order that they are listed in the attached inspection report.
- 5. <u>Photographs</u>: Not required. If you do submit photographs, please ensure that they are labeled and that they support submitted work orders and or invoices. Photographs, by themselves, are not acceptable documentation of correction.

³ Submit via CMTS upload (see https://www.tdhca.texas.gov/sites/default/files/pmcdocs/CMTSUserGuide-AttachingDocs.pdf) to the attention of Ysella Kaseman, and then mail Ysella Kaseman at ysella.kaseman@tdhca.texas.gov upon completion to notify TDHCA that the submission is ready for review.

Bldg	Apt	Location	Item	HUD Standard	Result	Notes	Sev.
12		Main Entry	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed	Outside unit 1216	LT
1		Hallways & Corridors (Bldg)	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
1		Hallways & Corridors (Bldg)	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling has sagging or dropping materials	Outside of unit 134	Severe
2		Hallways & Corridors (Bldg)	Sharp Edges	A sharp edge that can result in a cut or puncture hazard is present	Any item or component has a sharp edge that can puncture or cut	Outside unit 212	Severe
10		Hallways & Corridors (Bldg)	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling has sagging or dropping materials	Outside unit 1033	Severe
1	111	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
1	113	Bathroom 1	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
1	113	Bathroom 1	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
1	113	Bathroom 1	Toilet	Only 1 toilet was installed, and it is missing	Toilet is missing (only toilet in unit)		LT
1	113	Bedroom 1	Floor Covering and Finishes	Floor substrate is exposed	10% or more of the floor substrate area is exposed in any room		Mod
1	113	Kitchen	Cooking Appliance	Primary cooking appliance is missing	Primary cooking appliance is missing	Missing stove	Severe
1	134	Bathroom 1	Toilet	A toilet is damaged or inoperable and at least 1 toilet is installed elsewhere that is operational	Toilet is damaged or inoperable (not only toilet in unit)	Missing handle	Mod
1	134	Bedroom 1	Smoke Alarms	Smoke alarm does not produce an audio or visual alarm when tested	Smoke alarm does not produce an audio or visual alarm when tested		LT
1	134	Bedroom 2	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
2	214	Bathroom 1	Sharp Edges	A sharp edge that can result in a cut or puncture hazard is present	Any item or component has a sharp edge that can puncture or cut		Severe

Bldg	Apt	Location	ltem	HUD Standard	Result	Notes	Sev.
2	214	Bathroom 2	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed	Bathroom two above the shower	LT
2	214	Kitchen	Mold-Like Substances	Presence of mold-like substance at high levels is observed visually	Moisture damage on a surface from 1 to 9 S.F. (Units)		Severe
2	214	Laundry Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
2	214	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
2	214	Living Room	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling has sagging or dropping materials		Severe
2	216	Bathroom 1	Door – General	A passage door component is damaged, inoperable, or missing and the door is not functionally adequate	A passage door component is damaged/missing/inoperable		Low
2	216	Bathroom 1	Toilet	A toilet is missing and at least 1 toilet is installed elsewhere that is operational	Toilet is missing (not only toilet in unit)		Mod
2	216	Bathroom 2	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
2	216	Kitchen	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed	Right ofmsink	LT
2	216	Kitchen	Cooking Appliance	Primary cooking appliance is missing	Primary cooking appliance is missing	Missing stove	Severe
2	216	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
2	216	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed	Right of entrance	LT
2	216	Living Room	HVAC Equipment	Fuel burning heating system or device exhaust vent is misaligned, blocked, disconnected, improperly connected, damaged, or missing	HVAC exhaust vent is damaged or missing		LT
2	216	Living Room	HVAC Equipment	Fuel burning heating system or device exhaust vent is misaligned, blocked, disconnected, improperly connected, damaged, or missing	HVAC exhaust vent is damaged or missing		LT
2	221	Bathroom 1	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling has sagging or dropping materials		Severe

Bldg	Apt	Location	Item	HUD Standard	Result	Notes	Sev.
2	221	Bathroom 1	GFCI/AFCI	GFCI outlet or GFCI breaker is not visibly damaged and the test or reset button is inoperable	GFCI outlet or GFCI breaker reset button does not test (No visible damage)		Severe
2	221	Bathroom 2	Sink	Sink is not draining	Sink is clogged/not draining	Master bath	Mod
2	226	Bedroom 2	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
2	226	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
3	311	Kitchen	Infestation	Evidence of cockroaches	Evidence of cockroaches (Live, Dead, or Other Evidence)		Mod
3	311	Kitchen	Refrigerator	Refrigerator component is damaged such that it impacts functionality	Refrigerator door handle is damaged		Mod
3	321	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
3	321	Living Room	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing	Above entry way	LT
3	324	Bathroom 1	Mold-Like Substances	Presence of mold-like substance at high levels is observed visually	Moisture damage on a surface from 1 to 9 S.F. (Units)		Severe
3	324	Bathroom 1	Toilet	Toilet is not secured at the base	Toilet is not secured at base/loose		Mod
3	324	Bathroom 2	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
3	324	Bathroom 2	Toilet	Toilet is not secured at the base	Toilet is not secured at base/loose		Mod
3	324	Bedroom 2	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
3	324	Kitchen	Infestation	Evidence of cockroaches	Evidence of cockroaches (Live, Dead, or Other Evidence)		Mod
3	324	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
4	417	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
4	417	Bedroom 2	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
4	417	Hallways & Corridors	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT

Bldg	Apt	Location	ltem	HUD Standard	Result	Notes	Sev.
4	417	Kitchen	GFCI/AFCI	GFCI outlet or GFCI breaker is not visibly damaged and the test or reset button is inoperable	GFCI outlet or GFCI breaker reset button does not test (No visible damage)	Right of sink	Severe
4	417	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
4	417	Living Room	Sharp Edges	A sharp edge that can result in a cut or puncture hazard is present Window component is damaged or missing	Any item or component has a sharp edge that can puncture or cut A unit window is damaged or missing	Broken window right of entrance in living room	Severe
4	417	Living Room	Window	and the window is not functionally adequate	affecting illumination or protection from the elements		Mod
4	423	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
5	511	Bathroom 1	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed	Above shower master bathroom	LT
5	511	Bedroom 1	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
5	511	Bedroom 1	Conductors, Outlets, Switches	Exposed electrical conductor	Exposed electrical conductor		LT
5	511	Bedroom 1	Conductors, Outlets, Switches	Exposed electrical conductor	Exposed electrical conductor		LT
5	511	Bedroom 1	Sharp Edges	A sharp edge that can result in a cut or puncture hazard is present	Any item or component has a sharp edge that can puncture or cut		Severe
5	511	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
5	511	Bedroom 1	Window	Window component is damaged or missing and the window is not functionally adequate	A unit window is damaged or missing affecting illumination or protection from the elements		Mod
5	511	Bedroom 2	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
5	511	Hallways & Corridors	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed outside a sleeping room		LT
5	511	Kitchen	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed	Above stove hookup	LT
5	511	Kitchen	Cooking Appliance	Primary cooking appliance is missing	Primary cooking appliance is missing		Severe

Bldg	Apt	Location	ltem	HUD Standard	Result	Notes	Sev.
5	511	Living Room	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
6	616	Bathroom 1	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
6	616	Bedroom 1	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
6	616	Bedroom 1	Door – General	A door that is not intended to permit access between rooms has a damaged, inoperable, or missing component	Closet door component is missing, damaged or inoperable		Low
6	616	Bedroom 1	Mold-Like Substances	Presence of mold-like substance at extremely high levels is observed visually	Moisture damage on a surface more than 9 S.F. (Units)		LT
6	616	Bedroom 2	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
6	616	Living Room	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
6	616	Living Room	Floor Covering and Finishes	Floor substrate is exposed	10% or more of the floor substrate area is exposed in any room		Mod
6	616	Living Room	Mold-Like Substances	Presence of mold-like substance at high levels is observed visually	Moisture damage on a surface from 1 to 9 S.F. (Units)		Severe
6	623	Bedroom 2	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing	Master bedroom	LT
6	623	Living Room	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
7	712	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
7	712	Bedroom 2	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
7	712	Hallways & Corridors	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed outside a sleeping room		LT
7	712	Hallways & Corridors	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
7	712	Kitchen	Refrigerator	Refrigerator component is damaged such that it impacts functionality	Refrigerator door seal is damaged		Mod

Bldg	Apt	Location	ltem	HUD Standard	Result	Notes	Sev.
7	712	Living Room	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
7	721	Bathroom 1	Sprinkler Assembly	Sprinkler head assembly is encased or obstructed by an item or object that is within 18 inches of the sprinkler head	Sprinkler head is encased/obstructed		LT
7	721	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
7	721	Bedroom 1	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance Smoke alarm is not installed where	Sprinkler head escutcheon is missing Smoke alarm not installed in a sleeping		LT
7	721	Bedroom 2	Smoke Alarms	required	room		LT
7	721	Hallways & Corridors	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed outside a sleeping room		LT
7	725	Bathroom 2	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source	Left of sink	Severe
7	725	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
8	813	Bathroom 1	Toilet	Toilet is not secured at the base	Toilet is not secured at base/loose		Mod
8	813	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
8	817	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Exposed electrical conductor		LT
8	817	Living Room	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed outside a sleeping room		LT
8	822	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
8	822	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
9	912	Bedroom 1	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
9	912	Kitchen	Infestation	Evidence of cockroaches	Evidence of cockroaches (Live, Dead, or Other Evidence)		Mod

Bldg	Apt	Location	ltem	HUD Standard	Result	Notes	Sev.
9	912	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
9	915	Bedroom 1	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler assembly component is missing or damaged		LT
9	915	Kitchen	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
9	915	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
10	1013	Bedroom 1	Smoke Alarms	Smoke alarm does not produce an audio or visual alarm when tested	Smoke alarm does not produce an audio or visual alarm when tested		LT
10	1013	Bedroom 2	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
10	1013	Kitchen	Infestation	Evidence of cockroaches	Evidence of cockroaches (Live, Dead, or Other Evidence)		Mod
10	1013	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
10	1022	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
10	1022	Hallways & Corridors	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed outside a sleeping room		LT
10	1022	Kitchen	Refrigerator	Refrigerator component is damaged such that it impacts functionality	Refrigerator door seal is damaged		Mod
10	1022	Laundry Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
10	1022	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
10	1022		Sprinklor Accombly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
10	1022 1033	Living Room Bedroom 1	Sprinkler Assembly Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		
10	1033	Bedroom 2	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT

Bldg	Apt	Location	Item	HUD Standard	Result	Notes	Sev.
10	1033	Hallways & Corridors	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed outside a sleeping room	Outside of bedroom. 2	LT
10	1033	Kitchen	Refrigerator	Refrigerator component is damaged such that it impacts functionality	Refrigerator door seal is damaged		Mod
10	1033	Living Room	Sprinkler Assembly	Sprinkler head assembly is encased or obstructed by an item or object that is within 18 inches of the sprinkler head	Sprinkler head is encased/obstructed		LT
11	1111	Bedroom 2	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
11	1115	Bathroom 1	Toilet	Toilet is not secured at the base	Toilet is not secured at base/loose		Mod
11	1118	Kitchen	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
11	1118	Kitchen	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
11	1118	Kitchen	Cooking Appliance	Primary cooking appliance is missing	Primary cooking appliance is missing		Severe
11	1118	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
11	1118	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
11	1118	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
11	1118	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
11	1118	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
11	1118	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
11	1118	Living Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
12	1216	Bathroom 1	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
12	1216	Bathroom 2	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT

Bldg	Apt	Location	Item	HUD Standard	Result	Notes	Sev.
12	1216	Bedroom 1	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
12	1216	Bedroom 2	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
12	1216	Bedroom 2	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
12	1216	Dining Room	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
12	1216	Dining Room	Wall Covering and Finish – Interior	Interior wall component is not functionally adequate	Interior wall component(s) is not functionally adequate		Mod
12	1216	Kitchen	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
12	1216	Kitchen	Conductors, Outlets, Switches	Outlet does not have visible damage and testing indicates it is not energized	Electric outlet inoperable (no visible damage)		Severe
12	1216	Kitchen	Conductors, Outlets, Switches	Exposed electrical conductor	Electrical conductor is not properly insulated/enclosed		LT
12	1216	Kitchen	Wall Covering and Finish – Interior	Interior wall component is not functionally adequate	Interior wall component(s) is not functionally adequate		Mod
12	1216	Living Room	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe
12	1216	Living Room	Wall Covering and Finish – Interior	Interior wall component is not functionally adequate	Interior wall component(s) is not functionally adequate		Mod
12	1222	Bathroom 2	GFCI/AFCI	GFCI outlet or GFCI breaker is not visibly damaged and the test or reset button is inoperable	GFCI outlet or GFCI breaker reset button does not test (No visible damage)		Severe
12	1222	Bathroom 2	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
13	1312	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
13	1312	Dining Room	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
13	1312	Hallways & Corridors	Smoke Alarms	Smoke alarm does not produce an audio or visual alarm when tested	Smoke alarm does not produce an audio or visual alarm when tested		LT
13	1312	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe

Bldg	Apt	Location	Item	HUD Standard	Result	Notes	Sev.
13	1312	Laundry Room	Smoke Alarms	Smoke alarm does not produce an audio or visual alarm when tested	Smoke alarm does not produce an audio or visual alarm when tested		LT
13	1315	Laundry Room	GFCI/AFCI	An unprotected outlet is present within six feet of a water source	Missing GFCI protection on outlet within Six Feet of water source		Severe
13	1321	Living Room	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
14	1412	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Smoke alarm not installed in a sleeping room		LT
14	1412	Bedroom 1	Sprinkler Assembly	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance	Sprinkler head escutcheon is missing		LT
14	1412	Hallways & Corridors	Smoke Alarms	Smoke alarm does not produce an audio or visual alarm when tested	Smoke alarm does not produce an audio or visual alarm when tested		LT
14	1422	Bedroom 1	Smoke Alarms	Smoke alarm is not installed where required	Wall-mounted smoke alarm within 4in. of a ceiling		LT
14	1422	Bedroom 2	Ceiling Covering and Finishes	Ceiling component is not functionally adequate	Ceiling component(s) is not functionally adequate		Severe