

SONOMA HOUSING ADVISORS AND BILL FISHER TDHCA - Corrective Action Plan

Date: August 26, 2025

Mr. Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
P.O. Box 13941
Austin, TX 78711-3941

Subject: Corrective Action Plan and Limited Participation Agreement

Dear Mr. Wilkinson,

At the meeting on July 10, 2025, board members requested a correction action plan for the parties facing possible debarment action by TDHCA. Sonoma Housing and me hereby provide a corrective action plan to the Board and TDHCA Staff. I believe it addresses the circumstances where Sonoma Housing and Bill Fisher provide consulting services to developers using TDHCA resources. These applications and related responses, including but not limited to, 4% and 9% HTC application, MFDL applications, other soft funding or loan resources supporting existing or planned affordable housing. Further related to applications to TDHCA as a bond issuer with statewide authority to issue private activity bonds for multifamily affordable housing. I believe these satisfactorily addresses staff's and the Board's concern in ensuring submissions are properly reviewed prior to any submissions to staff including Asset management.

Review and verification procedure improvements

Sonoma Housing and its personnel including Bill Fisher has established a review procedure that require one or more peer reviews of submissions prepared for submission by clients to TDHCA.

Sonoma Housing will no longer make direct submissions to the department on behalf of its clients. All submissions following this peer review will be sent to the client\sponsor\applicants for their own review and verification

The Client\Sponsor\applicants will only make the final submission to TDHCA through the approved method presume to be CMTS or Electronic filing agreements related to the specific applications.

Sonoma Housing and its personnel will not make submissions on anyone's behalf directly to the department unless the application is for Bill Fisher and Sonoma Housing as sponsor. (see agreed voluntary nonparticipation agreement)

SHA will obtain signatures from their 5 employees on these procedures for review and submission procedures for materials to TDHCA.

In the event a mistake is made in any communication with TDHCA Sonoma Housing will promptly notify staff of the issue and make any corrections deemed appropriate.

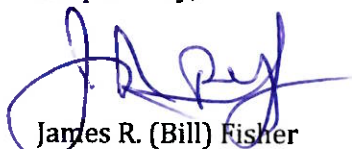
Limiting Sonoma Housing and Bill Fisher Participation

This submission of a redlined report on behalf of RISE Residential was not done intentionally and was clearly not represented to be the original work product of the author at CA Partners. Fisher has done business with TDHCA as Sonoma Housing and personally since 2011 and has no prior history nor findings of noncompliance. The record supports a strong track record of compliance with TDHCA rules and procedures for 15 years. We concede this mistake was made whereby the wrong report, which was not the original work of CA Partners. This is our first compliance issue with TDHCA during this period.

As penance for this mistake and in response to the Boards consideration of a voluntary nonparticipation agreement in lieu of debarment. I have attached a proposed agreement of non-participation responsive to the board feedback at the July 2025 board meeting.

Your consideration of this action plan and proposed voluntary non-participation agreement will ensure no further action is taken by the board of TDHCA related to the debarment recommendation from Staff.

Respectfully,



James R. (Bill) Fisher
President Sonoma Housing Advisors
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