



## Texas Department of Housing and Community Affairs

### Governing Board

#### Board Action Request

**File #:** C-017

**Agenda Date:** 7/10/2025

**Agenda #:** 16.

Presentation, discussion, and possible action on recommendation to debar Rise Residential Construction Riverside, LLC, Melissa Fisher, Sonoma Housing Advisors, LLC, and James R. (Bill) Fisher, relating to Riverside Heights Senior Living AKA Legacy Riverside Senior Living Community (HTC #20613 / Bond #20613B / CMTS 5659)

#### **RECOMMENDED ACTION**

**WHEREAS**, TDHCA approved a 4% HTC and Bond allocation during 2020, for the new construction of Riverside Heights Senior Living AKA Legacy Riverside Senior Living Community (HTC #20613 / Bond #20613B / CMTS 5659) (the Property);

**WHEREAS**, Rise Residential Construction Riverside, LLC and Melissa Fisher are considered to be Responsible Parties, as defined by 10 TAC §2.102. Rise Residential Construction Riverside, LLC is the general contractor for the construction of Riverside, and is controlled by its manager, Melissa Fisher;

**WHEREAS**, Sonoma Housing Advisors, LLC and James R. (Bill) Fisher are considered to be Consultants, as defined by 10 TAC §2.102. Sonoma Housing Advisors, LLC is the Consultant for the bond application and construction of Riverside, and is controlled by its manager, James R. (Bill) Fisher;

**WHEREAS**, 10 TAC §10.401(b)(5) requires the submission of quarterly Construction Status Reports (CSR), including the submission of a third-party construction inspection report;

**WHEREAS**, on October 10, 2024 at 5:18pm, Bill Fisher submitted to the Department a quarterly CSR on behalf of Melissa Fisher, including Construction Progress Report No. 042 dated September 25, 2024, from CA Partners, Inc., the third-party inspector (Submitted CSR);

**WHEREAS**, multiple pages of the Submitted CSR were electronically signed by Melissa Fisher prior to submission to the Department;

**WHEREAS**, Report No. 042, the third-party construction inspection report, was materially altered prior to submission to the Department;

**WHEREAS**, upon request of the Department, CA Partners, Inc. provided an original version of Report No. 042 and confirmed that it did not make or approve said alterations;

**WHEREAS**, per the TDHCA Asset Management Division, submitting altered reports is not common practice and all of the alterations, whether obvious or not, and whether negligent or intentional, make it so that the CSR prepared by the third-party inspector was not what was actually submitted to the Department as required under 10 TAC §10.401(b)(5);

**WHEREAS**, intentionally or negligently providing material misrepresentations with regard to documentation submitted to the Department by a Responsible Party or a Consultant is a violation of 10 TAC §2.401(a)(5), and is grounds for discretionary debarment under 10 TAC

§2.401(a)(5);

**WHEREAS**, representatives for Rise Residential Construction Riverside, LLC, Melissa Fisher, Sonoma Housing Advisors, LLC, and James R. (Bill) Fisher, participated in an informal conference with the TDHCA Enforcement Committee on March 25, 2025;

**WHEREAS**, on April 11, 2025, the TDHCA Executive Director issued a debarment determination notice recommending a six-month debarment term for all four parties, beginning July 10, 2025 and ending January 10, 2026;

**WHEREAS**, Melissa Fisher and Bill Fisher have submitted multiple appeals and additional information on appeal, all of which have been considered and are incorporated herein; and

**WHEREAS**, staff has based the above debarment recommendation on the Department's rules for debarment and an assessment of each and all of the material factors identified at 10 TAC §2.401(j) that are to be considered in determining a recommended period of debarment, applied specifically to the facts and circumstances present in this case.

**NOW, therefore, it is hereby**

**RESOLVED**, that a Final Order of Debarment through January 10, 2026, for Rise Residential Construction Riverside, LLC, Melissa Fisher, Sonoma Housing Advisors, LLC, and James R. (Bill) Fisher, substantially in the form presented at this meeting, and authorizing any non-substantive technical corrections, is hereby adopted as the order of this Board.

### **BACKGROUND**

#### **REFERRED VIOLATIONS SUBJECT TO DEBARMENT:**

1. Tex. Gov't. Code 2306.0504(b) states, *"(b) The department may debar a person from participation in a department program on the basis of the person's past failure to comply with any condition imposed by the department in the administration of its programs."*
2. 10 TAC §2.401(a)(5) states, *"(a) The Department may debar a Responsible Party, a Consultant and/or a Vendor who has exhibited past failure to comply with any condition imposed by the Department in the administration of its programs. [...] (5) Providing fraudulent information, knowingly falsified documentation, or other intentional or negligent material misrepresentation or omission with regard to any documentation, certification or other representation made to the Department;"*

Rise Residential Construction Riverside, LLC, Melissa Fisher, Sonoma Housing Advisors, LLC, and James R. (Bill) Fisher are eligible for debarment under 10 TAC §2.401(a)(5) for submitting an altered third-party inspection report to the Department on October 10, 2024, as part of a quarterly Construction Status Report (CSR) for the Property. Quarterly CSRs are required under 10 TAC §10.401(b)(5), and must include a third-party inspection report: *"[...] All Third Party construction inspection reports not previously submitted. If the lender and/or investor does not require third party construction inspection reports,*

*the Development Owner must hire a third party inspector to perform these inspections on a quarterly basis and submit the reports to the Department. Third Party construction inspection reports must include, at a minimum, the date construction started (initial submission only), a discussion of site conditions as of the date of the site visit, current photographs of the construction site and exterior and interior of buildings, an estimated percentage of construction completion as of the date of the site visit, identification of construction delays and other relevant progress issues, if any, and the anticipated construction completion date."*

The altered third quarter CSR (Q3 CSR) included documents electronically signed by Melissa Fisher of Rise Residential Construction Riverside, LLC on October 9, 2024, and was submitted to TDHCA by Bill Fisher of Sonoma Housing Advisors, LLC at 5:18pm on October 10, 2024. Melissa Fisher then uploaded the same altered Q3 CSR to TDHCA at 7:44pm on October 10, 2024. See Exhibit 1 for key alteration excerpts, and Exhibit 2 for a TDHCA blackline analyzing all alterations. Misrepresentations and alterations in the Q3 CSR include but are not limited to:

- Adding comments in red font;
- Deletions and additions in red font;
- Inconspicuous deletions and additions in black font of material information; and
- Deleting, in its entirety, the September 2024 G702 and G703 that the third-party inspector had attached to its Report No. 042 with notations regarding budget concerns, and replacing those documents with a new version that did not include the inspector's notations and was not signed by the architect.

**PROPERTY INFORMATION:** 2020 4% HTC and Bond award for new construction. 264 units in Fort Worth, Tarrant County, with all units restricted at 60% AMI. The Development serves the elderly population. Financing closed in December 2020, and based on the representations made at application should have been completed within two years, but there have been significant construction delays, and the project was approximately 82% complete as of the April 2025 quarterly CSR, with completion estimated to occur in October 2025. Per Multifamily Bond Finance, the vast majority of other developments awarded by TDHCA during that time are complete.

**DEBARRED PARTIES:** Rise Residential Construction Riverside, LLC is the general contractor for the construction of the Property, and is controlled by its manager, Melissa Fisher. Both are considered to be Responsible Parties as defined by 10 TAC §2.102. Sonoma Housing Advisors, LLC is the consultant for the bond application and construction of the Property. Sonoma Housing Advisors, LLC is controlled by its manager, James R. (Bill) Fisher. Both are considered to be Consultants as defined by 10 TAC §2.102. 10 TAC §2.401(a) permits debarment of Responsible Parties, Consultants, and Vendors.

**BACKGROUND:** On October 10, 2024, Melissa Fisher attended a TDHCA board meeting to support an agenda item requesting a supplemental allocation of bonds for the Property to aid in the absorption of increased costs. Rise represented it was in jeopardy of not meeting the federal requirement that at least 50% of the development's aggregate basis be financed with

private activity/tax-exempt bonds. That supplemental bond application required, among other things, a Development Cost Schedule that reflected the most current total development costs, along with a Schedule of Values that substantiated these costs. The numbers in those two documents were inconsistent, so TDHCA staff reviewed several quarterly CSRs to get a better understanding of construction progress and costs since the transaction had closed over four years earlier, in December of 2020, and remained incomplete. Staff found more discrepancies between the CSRs, and the schedules in the supplemental bond application. TDHCA staff's recommendation for the board item was neutral, and staff noted significant concerns regarding cost inconsistencies in documents reviewed by staff to evaluate the request. When staff questioned the inconsistencies, the developer responded that the Q3 CSR would reflect cost corrections. That report was due on October 10, 2024, the same day as the October board meeting. During the board meeting, Board members asked questions about the cost discrepancies, and noted that the Q3 CSR had not already been submitted despite the fact that the Department's cost concerns would be discussed during the board meeting. Melissa Fisher stated that the report would be filed later that day. The Board tabled its decision, and the inducement remains on hold to date.

The board meeting ended at 2:03pm on October 10, 2024. James R. (Bill) Fisher submitted the Q3 CSR at 5:18pm that afternoon, including Construction Progress Report No. 042 dated September 25, 2024, from CA Partners, Inc., the third-party inspector. Report No. 042 was heavily altered. Some of the alterations were obvious, using a contrasting red font to add comments. More concerning alterations to the report included deleting black text and substituting other text using a contrasting red font. Most concerning were material deletions and modifications in black font without any indication that changes had been made to the original text. Additionally, the September 2024 G702 and G703 that CA Partners, Inc. attached to its Report No. 042 with disclosed notations regarding some of its budget concerns was deleted in its entirety from the version of Report No. 042 submitted to TDHCA, and replaced with a new version that did not include CA Partners' notations and was not signed by the architect. Multiple pages of the Q3 CSR submitted on October 10, 2024, were electronically signed by Melissa Fisher.

On December 5, 2024, TDHCA contacted CA Partners, Inc. to request a copy of the original Report No 042. CA Partners, Inc. provided the original report, and confirmed that it did not produce or approve the altered version. See Exhibit 1 for key alteration excerpts, and Exhibit 2 for a TDHCA blackline analyzing all alterations.

Per Rosalio Banuelos, who referred the above parties for debarment, submitting altered CSRs is not common practice. All of the changes to the CA Partners, Inc. report, whether obvious or not, and whether negligent or intentional, make it so that the report prepared by the third-party inspector was not what was actually submitted to the Department as required under 10 TAC §10.401(b)(5).

**DEBARMENT IS DISCRETIONARY:** Debarment is discretionary for this violation, per the above referenced statute and rule.

**FACTORS CONSIDERED TO DETERMINE RECOMMENDED DEBARMENT TERM:** The Enforcement Committee held an informal conference on March 25, 2025, and submitted a recommendation for debarment to the TDHCA Executive Director. On April 11, 2025, the TDHCA Executive Director issued a debarment determination notice recommending a six month debarment term for Rise Residential Construction Riverside, LLC, Melissa Fisher, Sonoma Housing Advisors, LLC, and James R. (Bill) Fisher. There is no required minimum or maximum debarment term, and the Board may increase or decrease the term. Pursuant to 10 TAC §2.401(j), the recommended period of debarment was based upon the following material factors:

**1. Repeated enforcement occurrences:**

- a. Debarment:** There are no prior debarment referrals for any of the referred parties.
- b. Administrative Penalty:** Melissa Fisher has an open administrative penalty referral for final construction inspection violations at Lakeview Pointe Senior Living (HTC 17435 / CMTS 5350), which was referred for an administrative penalty on May 1, 2025. Partial corrective documentation was submitted on May 8, 2025, and an informal conference was held on May 29, 2025. Circumstances did not support an administrative penalty, and the Enforcement Committee voted to accept a corrective plan to submit all remaining corrections within 10 days. Corrections were submitted, and are under review. Ms. Fisher is also associated with two prior administrative penalty referrals for final construction inspection violations at Austin Colorado Creek (HTC 15423 / CMTS 5154) and Creekview Apartment Homes (HTC 17424 / CMTS 5268). Both were referred together and resolved informally since they were a first-time referral, however, corrective documentation submitted for both properties required multiple corrective reviews. All three developments and final construction responses were behind schedule.

- 2. Seriousness of underlying issues:** The alterations are serious, particularly those alterations where text was inconspicuously deleted or added in black matching font, such as the change-order section, and where the altered information was material to the CSR. The Enforcement Committee was not able to establish clear intent, however, intent is not required under the rule to warrant debarment. At best, submitting the altered report demonstrates negligence by the Responsible Parties and Consultants. At worst, it could demonstrate intentional misrepresentation. Both negligent and intentional misrepresentation are subject to debarment per 10 TAC §2.401(a)(5). The Committee then considered whether this was an isolated clerical error, accidentally submitting an internal working version as claimed, or whether it might represent a pattern of behavior. Altered reports were not thought to be habitual, however, as noted during the October TDHCA board meeting, Multifamily Bond Finance previously identified concerns regarding construction delays as well as cost, budget, and change order inconsistencies. The Board asked questions about those concerns on October 10,

2024, and specifically inquired about the Q3 CSR that was due the same day. Submitting an altered third-party inspection report shortly afterward is extremely concerning within this context. Third-party construction inspection reports are vital so that the Department can evaluate progress and costs. Altering a report in any way is inappropriate and renders the rationale for requiring a third-party report meaningless.

- 3. Presence or absence of corrective action:** There is no way to correct this violation, however, the Committee was concerned that (upon notification from TDHCA regarding the altered report) there was (1) no submission of the correct original version of the CSR to the Department; and (2) no discussion of any internal investigation to identify the source of the alterations. It is critical that if a document is submitted in error to the Department, that the Responsible Party promptly correct the error and investigate to ensure that it does not happen again. It did not appear that the referred parties took this step, and they did not provide adequate answers to Committee questions during the informal conference. Bill Fisher indicated that CSR comments are routine, and that he submitted the wrong version because Melissa Fisher was at the TDHCA board meeting. However, Melissa Fisher repeatedly stated that she did not make the alterations and was uncertain who did. She also suggested that the deletions and black font edits might have been done by someone without much computer knowledge, and who perhaps did not know to make any comments in an easily identifiable way to track changes. The Committee noted that the black font alterations would require a full version of Adobe Acrobat Pro, and that in-line text alterations are actually quite difficult to make without inadvertently causing formatting and pagination errors, even for those experienced with the program. The Committee also noted that Melissa Fisher signed multiple pages in the submitted CSR.
- 4. Other material factors:** The referred parties are experienced, with thirteen actively monitored TDHCA developments and three more in progress. The referred parties have a history of issues, including challenges with construction delays and inconsistent costs. While those issues on their own do not rise to the level of debarment, they do inform the negligence component of 10 TAC §2.401(a)(5), supporting debarment for this referral. The committee is concerned that the referred parties are over-extended with the current properties in their portfolio and need to get the management of these properties under control before they are permitted to apply for or participate in any new programs or funds with TDHCA.

**RESPONSES AND APPEALS BY MELISSA FISHER AND BILL FISHER:** When TDHCA questioned Mr. Fisher about the alterations via email on December 5, 2024, he responded, "GC responses to their report comments are in red. Standard practice to respond to and correct issues in these reports. They go to the interim and permanent lender as well as the investor. So GC's do not leave inaccuracy un-rebutted in these circumstances." In a separate email on the same day, Mr. Fisher stated that, "The PM on the job at the time made the response." Then during the informal conference, he stated that he submitted the wrong report version by mistake since Melissa Fisher was away, but that it was his responsibility.

Melissa Fisher's written response to the debarment referral is at Exhibit 3, and both Melissa Fisher and Bill Fisher attended an informal conference with the Enforcement Committee on March 25, 2025. Their debarment appeals are at Exhibits 4 and 5. Both parties deny any unethical behavior or intent to misrepresent information. Both argue in their appeals that this was an isolated clerical mistake, and refer to their history with the Department as evidence that the submission was not intended as deception. Neither appeal address the edits in black text, but focus solely upon the edits in red text.

**APPEAL CLAIMS OF SINGLE OCCURRENCE OR "CLERICAL ERROR":** After receiving the debarment appeals, TDHCA requested the original 2024 Q1 and Q2 inspection reports from CA Partners, Inc., the third-party inspector, and compared those to the Q1 and Q2 CSRs submitted to TDHCA in order to confirm the parties' appeal claims that there was no history of document alteration. Those reviews appear to reveal a pattern of alterations. Like the 2024 Q3 CSR in question, the 2024 Q1 CSR also deleted in its entirety the G702 and G703 that the third-party inspector had attached to its report, replacing those documents with a different version that did not include the inspector's notations regarding budget concerns. Additionally, the Q1 2024 report substituted newer photographs in place of the photographs in the inspector's report. More troubling, however, are two pages of the 2024 Q2 CSR that contained significant and material alterations in black text. See Exhibit 1 for key alteration excerpts, and Exhibits 6 and 7 for TDHCA blacklines of the altered pages. These additional alterations appear to rebut the appeal assertions of a clerical error limited to the Q3 CSR. On May 30, 2025, TDHCA staff notified Melissa Fisher and Bill Fisher that the 2024 Q1 and Q2 reports would be considered as new evidence, and later provided time to submit additional information in response.

**ADDITIONAL INFORMATION SUBMITTED PER 10 TAC §1.7(f)(3):** Melissa Fisher and Bill Fisher submitted additional information, and the Executive Director approved placing Exhibits 10-12 before the Board for consideration. Claims from those submissions include, but are not limited to:

- 1. Claim: No basis for TDHCA to rely upon the third-party inspection reports by CA Partners:** The Fishers claim in Exhibits 11 and 12, that TDHCA has no basis to rely upon these reports because they were produced for the lender, and therefore TDHCA must commission its own report if it wants to rely upon the information provided. TDHCA is a major financing partner in the construction project, and quarterly CSRs are required by 10 TAC §2.401(b)(5) so that TDHCA can verify appropriate construction progress and budgeting, and prepare for cost certification. 10 TAC §2.401(b)(5) clearly states that the third-party inspection report component of a quarterly CSR must be provided to TDHCA, and that if a report is not required by the lender and/or investor, the Development Owner must hire a third-party inspector to perform inspections on a quarterly basis for submission to the Department. Submitting altered documentation to TDHCA is never acceptable; and directly contravenes the rule's intention to provide objective inspection reports for the Department to review.
- 2. Claim: No reason to know or suspect edits, and submission was not negligent.** Both Melissa Fisher and Bill Fisher have repeatedly stated they did not know the Q3 CSR had

been altered. At the informal conference, and in their original appeals at Exhibits 4 and 5, the Fishers asserted that submitting the altered Q3 CSR was a one-time clerical mistake. However, in her supplemental appeal at Exhibit 10, Ms. Fisher also asserted that the submission of the altered Q3 CSR was not negligent, as she had no way to foresee or suspect that a Rise employee would make edits to the report, despite the routine practice at Rise of making comments and notations on CSRs and despite the fact that Ms. Fisher's electronic signature was added to the Q3 CSR one day before it was submitted to TDHCA.

Exhibit 10 also confirms that Ms. Fisher's assertions during the informal conference and in Exhibit 4 were made without performing any reasonable investigation, a serious concern that the Enforcement Committee noted in the debarment factors above, and a concern that supports negligence. Compounding the issue, it appears there was a pattern of altered CSRs for this Development. In Exhibit 10, Ms. Fisher states that she performed an internal investigation *after* learning on *May 30, 2025*, that TDHCA intended to use additional Q1 CSR and Q2 CSR evidence. She then audited the CSRs and confronted an unnamed former staff member, who acknowledged he had made the undisclosed changes without her knowledge or consent because he allegedly "believed the inspection report was wrong and it reflected negatively on his work which could ultimately hurt his bonus compensation." TDHCA is uncertain why this internal investigation was only done after May 30, 2025, and not immediately upon learning about the Q3 CSR alterations that triggered this debarment referral. Per Ms. Fisher, the alterations were not identified prior to submission to TDHCA because she had no reason to suspect alteration, and she does not audit third-party content before submitting it as part of the CSR. Ultimately, any parties submitting documentation to TDHCA are responsible for ensuring the accuracy of their submissions.

- 3. Claim: No financial incentive to alter reports and no harm to TDHCA:** The Fishers both state that they had no financial incentive to manipulate the inspection reports. Ms. Fisher also states at Exhibit 11, that the alterations caused no harm to TDHCA, and that the altered report is not comparable to other, "more potentially harmful factors likely to cause serious harm to people, loss of property, or refusal to comply with the affordable housing statutes, rules, and regulations." However, as explained in the Background section above, there was a pending application for supplemental Bond financing for Riverside. TDHCA's resources are limited, and it is vital to ensure that those taxpayer funds are being appropriately administered. Reviewing the CSR submissions as part of the supplemental application was prudent due diligence to understand the project's progress and timeliness of completion before recommending that bond volume cap from TDHCA's over-subscribed set-aside be allocated toward the project.

Additionally, as noted above, Ms. Fisher has noted that her employee had a financial incentive to alter the reports.

- 4. Claim: Q3 edits were obvious and were promptly corrected.** Although, many of the Q3 edits were obvious since they were in red text with inconsistent fonts, there were also



substantive in-line edits in black text that were inconspicuous. TDHCA only identified the inconspicuous edits by performing a manual side-by-side comparison, initially prompted by the unusual red text. The problem was not corrected by the Fishers as the Department never received an original unedited version of the Q3 CSR from either Bill or Melissa Fisher; the report was requested by TDHCA directly from the inspector after identifying unusual fonts. Ms. Fisher first acknowledged the additional inconspicuous alterations in Exhibit 10. Furthermore, subsequent investigation by the Department after the debarment appeal led TDHCA staff to identify additional in-line edits in black text and matching fonts in the Q1 and Q2 CSRs, demonstrating a pattern of altered submissions and representations to TDHCA.

5. **Claim: TDHCA staff bias due to FBI investigation.** It is not explained why TDHCA would discriminate against a person for assisting federal law enforcement in a case over twenty years ago, as asserted in Exhibit 12. This specter was raised for the first time by the Fishers after the Enforcement Committee made its recommendation, and after the Debarment Determination Notice was issued by the Executive Director. This FBI investigation and criminal case against non-TDHCA parties two decades ago was not raised and was not a factor that the Enforcement Committee considered.
6. **Claim: Failure to provide due process.** Bill Fisher claims in Exhibit 12 that not allowing Board members to interview TDHCA staff making debarment recommendations compromises neutrality due to the above staff bias claim. Tex. Gov't. Code 2306.0504(a) states that, "(a) The department shall develop, and the board by rule shall adopt, a policy providing for the debarment of a person from participation in programs administered by the department." Tex. Gov't. Code 2306.0504(d) further states, "A person debarred by the department from participation in a department program may appeal the person's debarment to the board." The Department's debarment process is adopted at 10 TAC §2.401 and includes multiple steps to ensure fairness. After referral for debarment consideration, the TDHCA Enforcement Committee holds an informal conference with the referred party to identify any mitigating factors that should be considered by the Enforcement Committee. The Enforcement Committee then deliberates in a closed session after the public portion of the conference has ended, and makes a recommendation to the Executive Director, who reviews the matter and issues a Notice of Debarment Determination if he concurs with the recommendation. Finally, the referred party has an opportunity to appeal the debarment to TDHCA's Governing Board.
7. **Claim: Selective enforcement.** Bill Fisher claims in Exhibit 12, that it is common to submit the wrong reports, and that on June 12, 2025, there was an incident involving 15 developers uploading the wrong reports. Additionally, he claims that in both the December 12, 2024, and the March 6, 2025, TDHCA board meetings, individuals who "committed much more grievous errors" were not referred for debarment and received an opportunity to correct. However, these submissions are not comparable. The referenced submissions relate to 9% application deficiencies, which were considered

“administrative deficiencies” identified by TDHCA that were, by statute and rule, allowed to be corrected. If the deficiencies are not corrected, the result is applications are terminated. This debarment relates to material misrepresentations made by altering a third-party CSR in relation to a forty-million-dollar bond issuance made by the Department, and for which the Parties are subject to debarment under the Rules.

**Proposed corrective plans in lieu of debarment:** Melissa Fisher at Exhibit 11 suggests that going forward, the Rise VP of Compliance will submit the CSR package via CMTS, the third-party inspector will submit the inspection report directly to TDHCA, and Rise will change their internal policy for which employees are granted access to original inspection reports. Bill Fisher at Exhibit 12 suggests that he will not submit any further construction reports to TDHCA. The Board may consider whether these corrective actions, prospectively, completely mitigate the presented bases for debarment.

**RECOMMENDATION:** After consideration of all appropriate factors, the Enforcement Committee and Executive Director recommend a six-month debarment term for all four parties, beginning July 10, 2025, and ending January 10, 2026. The debarment term in the determination notice originally assumed a start date as of the May board meeting, however, presentation of the debarment was delayed to July due to an appeal extension request. The recommended Order includes language that would permit the Board to consider supplemental funding applications for existing engagements on a case-by-case basis during the debarment term so that current awarded construction projects are not adversely impacted.

*Exhibits:*

1. *Key Alteration Excerpts*
2. *TDHCA Blackline of 2024 Q3 CSR*
3. *March 6, 2025 Written Response by Melissa Fisher*
4. *April 25, 2025 Appeal by Melissa Fisher*
5. *April 25, 2025 Appeal by Bill Fisher*
6. *TDHCA Blackline of Altered Pages from 2024 Q1 CSR*
7. *TDHCA Blackline of Altered Pages from 2024 Q2 CSR*
8. *2024 Q1, Q2, and Q3 CSRs, as submitted to TDHCA*
9. *2024 Q1, Q2, and Q3 Construction Progress Reports, as prepared by CA Partners*
10. *June 6, 2025 Supplemental Information from Melissa Fisher*
11. *June 16, 2025 Supplemental Information from Melissa Fisher*
12. *June 16, 2025 Supplemental Information from Bill Fisher*