
WESTWOOD APARTMENTS

August 15, 2025

Cody Campbell
Director of Multifamily Finance
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701

RE: Westwood Apartments (TDHCA #24175) – Request to Return 2024 Credits and Request for 2025 Allocation of Credits Pursuant to Section 11.6(5) Force Majeure

Dear Mr. Campbell,

Pursuant to §11.6(5) of the 2024 Qualified Allocation Plan (“QAP”), Avanti Legacy Westwood, LP (the “Sponsor”) respectfully requests an allocation of 2025 Housing Tax Credit credits in exchange for the return of 2024 credits for Westwood Apartments (the “Development”). This is not a request for additional credits but rather a request to ensure compliance with the placed-in-service deadline by providing a modest schedule cushion. Specifically, we request a six-month extension to June 30, 2027, through issuance of a 2025 Housing Tax Credit commitment. While the current 15-month construction schedule targets completion by late 2026, our financing partners prudently require additional time to account for unanticipated delays. The requested extension aligns the deadline with that buffer.

The Development met the Readiness to Proceed threshold by acquiring the site and filing building permit applications before March 31, 2025. Since the TDHCA award log posted on July 25, 2024, our team has advanced the project through zoning approval, plat approval and recordation including relocation of an existing sewer line easement and associated site redesign per engineering requirements, building permit submittals, contractor selection and final pricing, and lender and investor engagement.

In January 2025, equity availability tightened as several major investors paused participation amid uncertainty over potential tax law changes and a pending bill. Meanwhile, elevated interest rates increased required returns and depressed equity pricing. As demand for 9% LIHTC contracted, investors redirected capital toward shorter term energy credits and prioritized investments motivated by the Community Reinvestment Act (“CRA”). With fewer active bidders in our markets, demand for LIHTC credits slowed and indicative pricing fell to roughly \$0.70 to \$0.78 per credit, making the development infeasible. To preserve feasibility, we worked closely with RBC Community Investments to complete diligence and secure a funding commitment that kept the development on track without significant changes to the underlying proposed development. As markets stabilized following passage

Avanti Legacy Westwood, LP
3933 Steck Ave, Ste. B120, Austin, TX 78759
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of federal tax legislation, and with our continued efforts, we moved the transaction forward. Even so, the unexpected equity market dislocation extended the closing timeline beyond our typical cadence. Feasible equity terms did not arrive until June 2025; after an expedited negotiation, we executed a letter of intent on July 2, 2025, preserving feasibility despite compressed pricing. These conditions were unforeseen and outside our control, and they support our request for force majeure relief.

A detailed project timeline is attached as Exhibit A and the current construction schedule as Exhibit B. For convenience, key milestones include:

- **July 25, 2024:** Award log posted; due diligence commenced
- **August – December 2024:** Zoning approval; plat application; carryover allocation agreement; design team mobilization
- **January – March 2025:** Land loan engagement and plat resubmittal; site purchase; GC bids received; building permit applications submitted
- **April – June 2025:** Lender term sheet issued; final plat approval; plat recordation; initial equity terms received June 18 signed July 2
- **July – August 2025:** Lender and Investor due diligence (i.e. market study, appraisals, environmental review, cost studies, and loan documentation, borrower review and LPA amendment); plan approval on August 8; GC final schedule of values and contract progress; permits expected for release on August 29
- **September 2025:** Board consideration on September 4; scheduled closing on September 5; notice to proceed expected on September 8

Our financial partners continue to demonstrate strong support for Westwood Apartments. Stellar Bank and RBC Community Investments are prepared to close upon board approval. Given the limited margin between projected completion, and the placed-in-service deadline, our equity partners have requested the extension as a condition of closing. Supporting correspondence from RBC Community Investments is attached as Exhibit C.

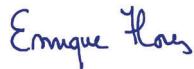
We understand that the Department is considering an administrative option in the 2026 QAP that would allow staff to grant a six-month extension if a development meets the requirements of §11.6(5). Our proposed Development would qualify under the current draft language, which includes developments awarded within the previous three years. As a 2024 Housing Tax Credit awardee, we understand that the only available path to a placed-in-service extension at this stage is through a force majeure request. While some developers may elect to wait until the 2026 QAP is finalized, we believe our request is justified, as this is the only remaining item preventing financing for our closing. Any further delay could materially impact construction pricing and potentially jeopardize the equity already committed to the Development. Therefore, we respectfully request that the Department approve the force majeure for Westwood Apartments. This action would provide the lender and investor with the confidence needed to proceed with closing in September.

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These circumstances, including the lack of available equity in our market, were unforeseen and outside our control, and they satisfy the TDHCA requirements for a reallocation of Housing Tax Credits under §11.6(5) of the 2024 QAP. We have acted diligently and advanced the Development to permits, recorded the subdivision plat, selected a general contractor, and scheduled closing. A six-month extension to June 30, 2027, with a 2025 HTC allocation is a proportional remedy that preserves feasibility with no increase in annual credits, no decrease in the number of units, no change to the affordability, and no tax exemption. We respectfully request staff's recommendation and Board approval at the September 4th meeting in order to preserve the September 5th closing and to authorize the issuance of the notice to proceed on September 8th.

If additional information is required, please contact me directly at or 512-982-1342.

Sincerely,



Henry Flores,
Authorized Signatory

Enclosures:

Exhibit A: Detailed Development Timeline

Exhibit B: Construction Schedule

Exhibit C: RBC Community Investments Supporting Documentation

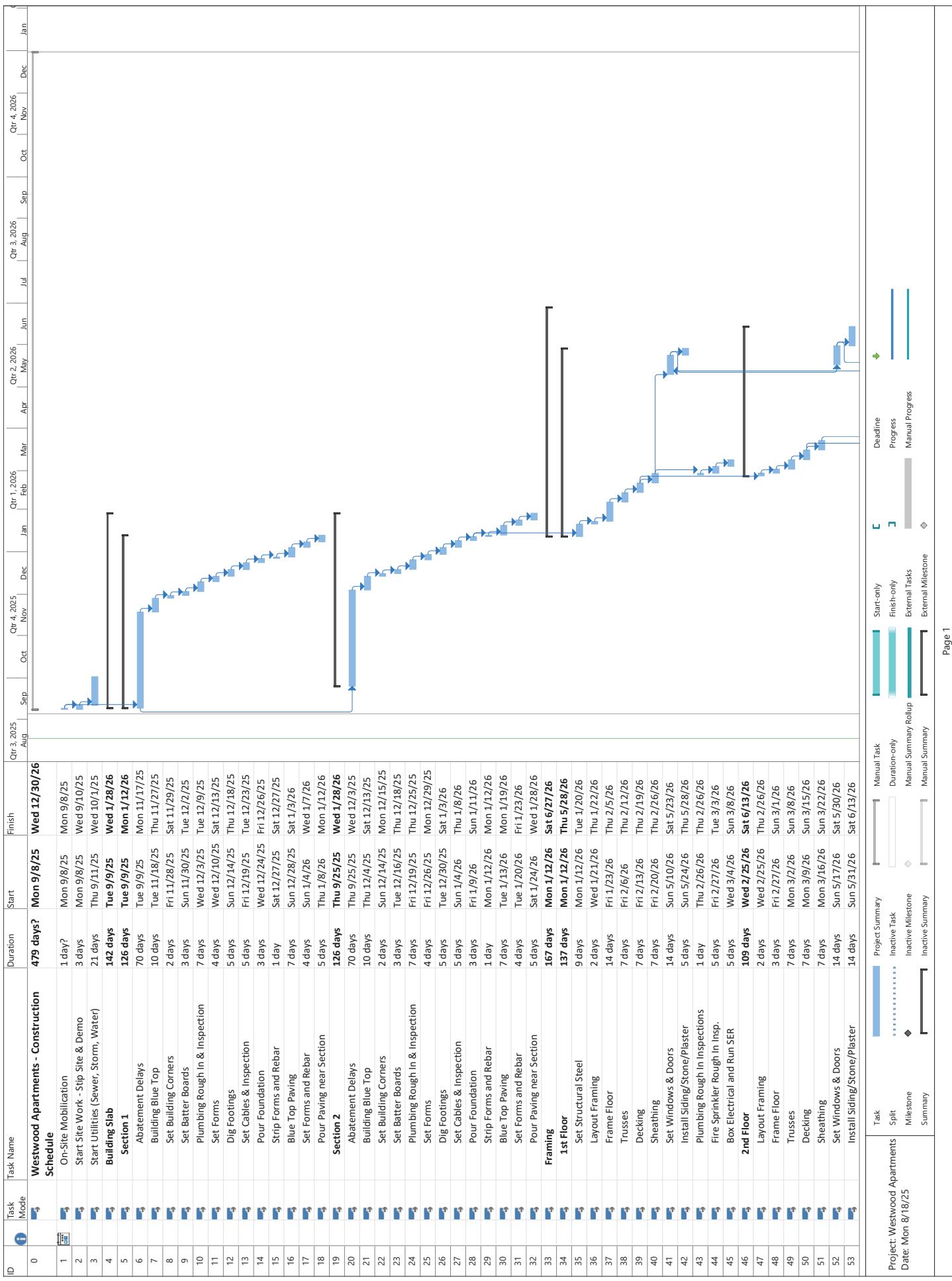
EXHIBIT A

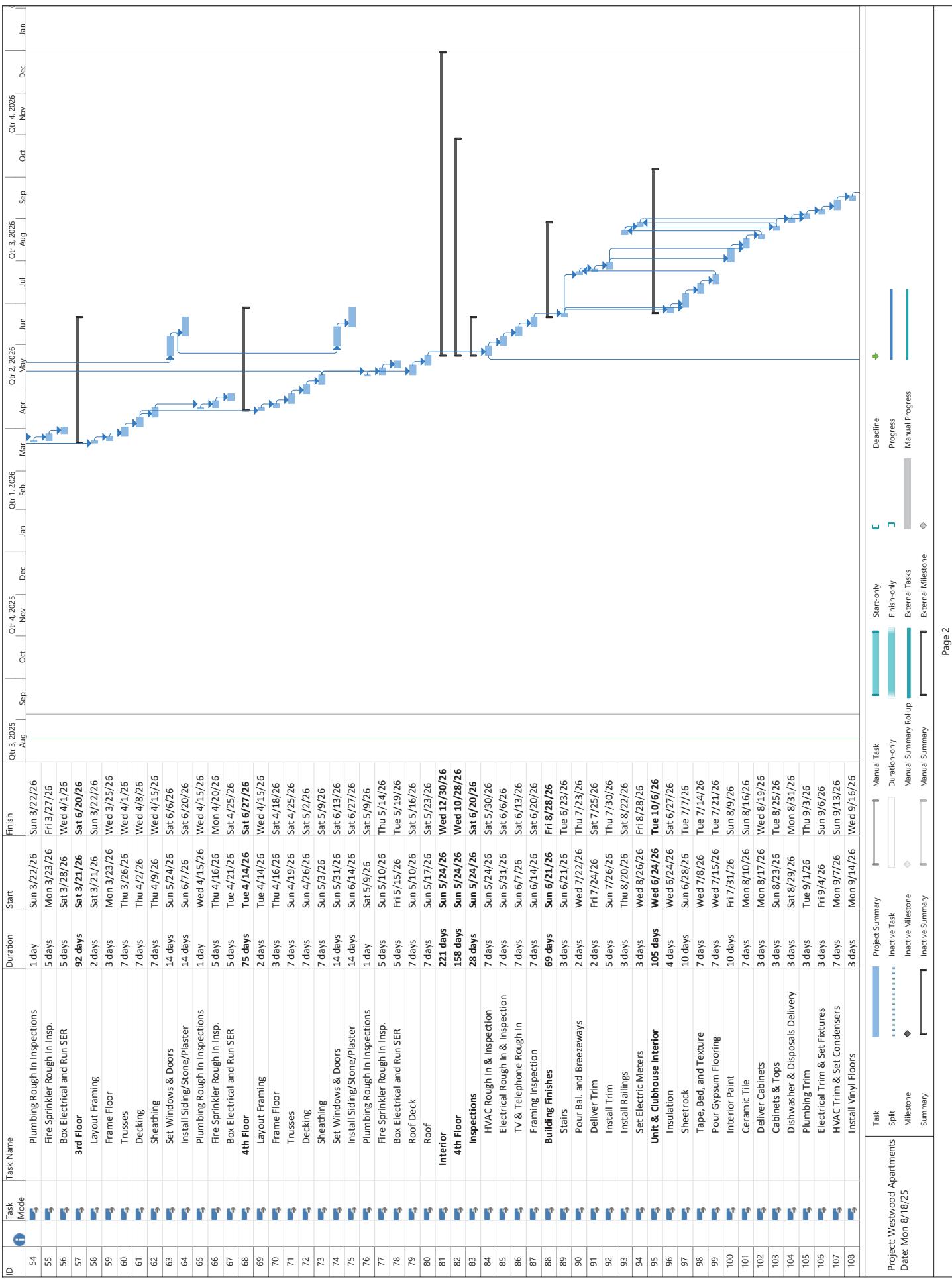
ID	Task Name	Duration	Start	Finish	Preded% Comp	Qtr 1, 2024			Qtr 2, 2024			Qtr 3, 2024			Qtr 4, 2024			Qtr 1, 2025			Qtr 2, 2025				
						Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
1	WESTWOOD - DEVELOPMENT TIMELINE	437 days	Tue 1/2/24	Wed 9/3/25	91%																				
2	TDHCA DEADLINES	219 days	Tue 1/2/24	Fri 11/1/24	10...																				
3	TDHCA Pre App	4 days	Tue 1/2/24	Fri 1/5/24	100%																				
4	TDHCA Full App	39 days	Fri 1/5/24	Fri 3/1/24	3																				
5	RFADS	46 days	Fri 3/1/24	Fri 5/3/24	4																				
6	Scoring Notice - Received 7/3/24	23 days	Mon 6/3/24	Wed 7/3/24	5																				
7	Underwriting Report - Received 7/12/24	30 days	Mon 6/3/24	Fri 7/12/24	100%																				
8	TDHCA Awards	10 days	Fri 7/12/24	Thu 7/25/24	7																				
9	TDHCA Commitment Notice	23 days	Mon 8/26/24	Wed 9/25/24	8																				
10	TDHCA Carryover Allocation Agreement	50 days	Sat 8/24/24	Fri 11/1/24	8																				
11					0%																				
12	SITE ZONING	166 days	Tue 1/9/24	Tue 8/27/24	10...																				
13	Application Period - Site Design & Surveying	31 days	Tue 1/9/24	Tue 2/20/24	100%																				
14	Zoning Application - Preliminary Submission	4 days	Wed 2/21/24	Mon 2/26/24	13																				
15	Preliminary City Meeting	1 day	Tue 2/27/24	Tue 2/27/24	14																				
16	Zoning Application - Resubmission	17 days	Mon 6/17/24	Tue 7/9/24	10...																				
17	Application Submission	1 day	Mon 6/17/24	Mon 6/17/24	100%																				
18	City Staff Review #1	6 days	Tue 6/18/24	Tue 6/25/24	17																				
19	Developer Response and Site Revisions	1 day	Mon 7/1/24	Mon 7/1/24	18																				
20	City Staff Review #2	4 days	Tue 7/2/24	Fri 7/5/24	19																				
21	Developer Response and Site Revisions	2 days	Mon 7/8/24	Tue 7/9/24	20																				
22	Planning & Zoning Commission	4 days	Wed 7/10/24	Mon 7/15/24	16																				
23	City of Killeen - City Council Workshop Meeting	26 days	Tue 7/16/24	Tue 8/20/24	22																				
24	City of Killeen - Council Meeting	5 days	Wed 8/21/24	Tue 8/27/24	23																				
25					0%																				
26	PLAT	221 days	Fri 10/25/24	Fri 8/29/25	12	94%																			
27	Preliminary Plat	121 days	Fri 10/25/24	Fri 4/11/25	10...																				
28	Survey & Plat Agreement	10 days	Fri 10/25/24	Thu 11/7/24	100%																				
29	Surveyor Field Work & Preliminary Design	14 days	Fri 11/8/24	Wed 11/27/24	28																				
30	Plat Draft	1 day	Thu 12/19/24	Thu 12/19/24	29																				
31	Civil Utility Plan Preparation	1 day	Mon 1/6/25	Mon 1/6/25	30																				
32	Plat Update Based On Utility Plan	2 days	Tue 1/7/25	Wed 1/8/25	31																				
33	Plat Application Seller Signature Coordination	11 days	Thu 1/9/25	Thu 1/23/25	32																				
34	Additional Civil Drawings	12 days	Fri 1/24/25	Mon 2/10/25	33																				
35	Pre-Submission City Review	9 days	Tue 2/11/25	Fri 2/21/25	34																				
36	Plat Application Submission	1 day	Mon 2/24/25	Mon 2/24/25	35																				
37	City Review #1	9 days	Tue 2/25/25	Fri 3/7/25	36																				
38	Surveyor & Civil Engineer Revision	14 days	Mon 3/10/25	Thu 3/27/25	37																				

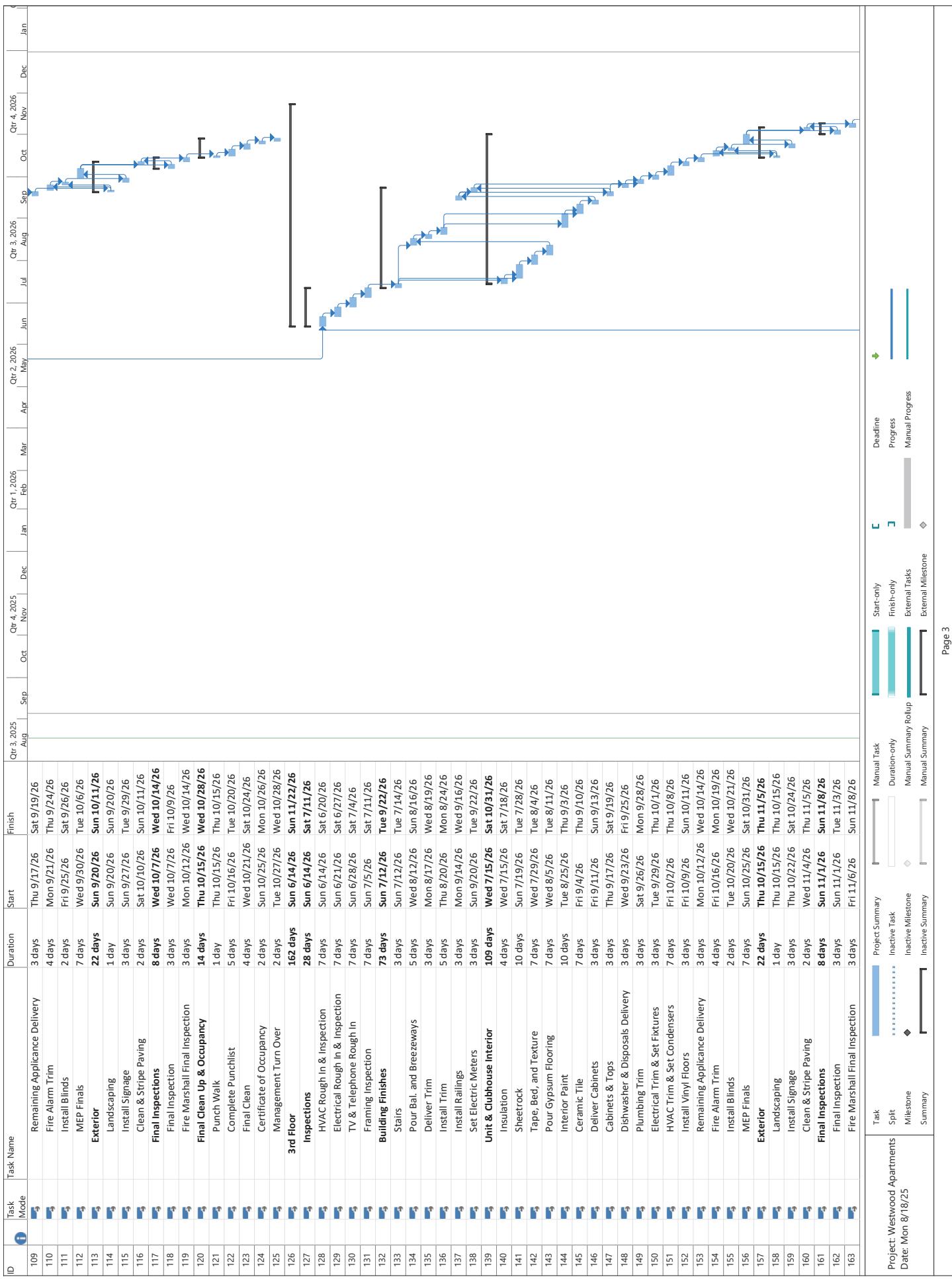
ID	Task Name	Duration	Start	Finish	Predict%
39	City Review #2	6 days	Fri 3/28/25	Fri 4/4/25	38 100%
40	Preliminary Plat Approval	5 days	Mon 4/7/25	Fri 4/11/25	39 100%
41	Final Plat	120 days	Mon 3/17/25	Fri 8/29/25	91%
42	Plat Application Draft & Seller Signature Coordination	5 days	Mon 4/7/25	Fri 4/11/25	39 100%
43	Final Plat Submission	1 day	Mon 4/14/25	Mon 4/14/25	42 100%
44	Staff Review #1	6 days	Tue 4/15/25	Tue 4/22/25	43 100%
45	Surveyor & Civil Engineer Revisions	8 days	Wed 4/23/25	Fri 5/2/25	44 100%
46	Staff Review #2	6 days	Mon 5/5/25	Mon 5/12/25	45 100%
47	Final Plat Approved	1 day	Tue 5/13/25	Tue 5/13/25	46 100%
48	Mylar Signature Coordination	19 days	Wed 5/14/25	Mon 6/9/25	47 10...
53	Mylar City Intake	1 day	Tue 6/10/25	Tue 6/10/25	52 100%
54	Plat & Park Fee Payment	3 days	Wed 6/11/25	Fri 6/13/25	53 100%
55	Final Plat Recordation	3 days	Mon 6/16/25	Wed 6/18/25	54 100%
56					0%
57	Building Permits	120 days	Mon 3/17/25	Fri 8/29/25	87%
58	Submit application	1 day	Mon 3/17/25	Mon 3/17/25	100%
59	City Review #1 (Released Upon Final Plat 41 days Approval)	32 days	Tue 3/18/25	Tue 5/13/25	58,47100%
60	Design Consultant Drawing Update	4 days	Fri 5/16/25	Mon 6/30/25	59,81100%
61	Full Plan Set - Issue #2 Submission	8 days	Tue 7/1/25	Fri 7/4/25	60 100%
62	City Review #2	10 days	Mon 7/7/25	Wed 7/16/25	61 100%
63	Full Plan Set - Issue #3	7 days	Thu 7/17/25	Wed 7/30/25	62 100%
64	City Review #2 & Plan Approval	5 days	Mon 8/11/25	Fri 8/15/25	63 100%
65	Pre-Construction Meeting With City Engineering	7 days	Mon 8/18/25	Tue 8/26/25	65 0%
66	Sub Contractor Registration	2 days	Wed 8/27/25	Thu 8/28/25	66 0%
67	Tap & Fee Payment	1 day	Fri 8/29/25	Fri 8/29/25	67 0%
68	Permit Release				0%
69					
70	CONSTRUCTION DRAWINGS	241 days	Wed 8/28/24	Wed 7/30/25	12 10...
71	Initial Design Coordination With City Engineering	11 days	Wed 8/28/24	Wed 9/11/24	100%
72	Architect and Civil Site Plan Revisions and Additional City Coordination	18 days	Fri 10/11/24	Tue 11/5/24	100%
73	Second City Staff Review of Site Plan	1 day	Wed 11/6/24	Wed 11/6/24	100%
74	Architectural & Civil Backgrounds	4 days	Thu 11/7/24	Tue 11/12/24	100%
75	Design Consultant Kick Off	7 days	Tue 11/12/24	Wed 11/20/24	100%
76	Topographical Survey	14 days	Fri 11/8/24	Wed 11/27/24	29SS 100%
77	Full Plan Set - Preliminary Issue Owner Review	40 days	Thu 11/21/24	Wed 1/15/25	75 100%
78	Full Plan Set - Issue #1	1 day	Thu 1/16/25	Thu 1/16/25	77 100%
79	Full Plan Set - Issue #1	17 days	Fri 1/17/25	Mon 2/10/25	78 100%

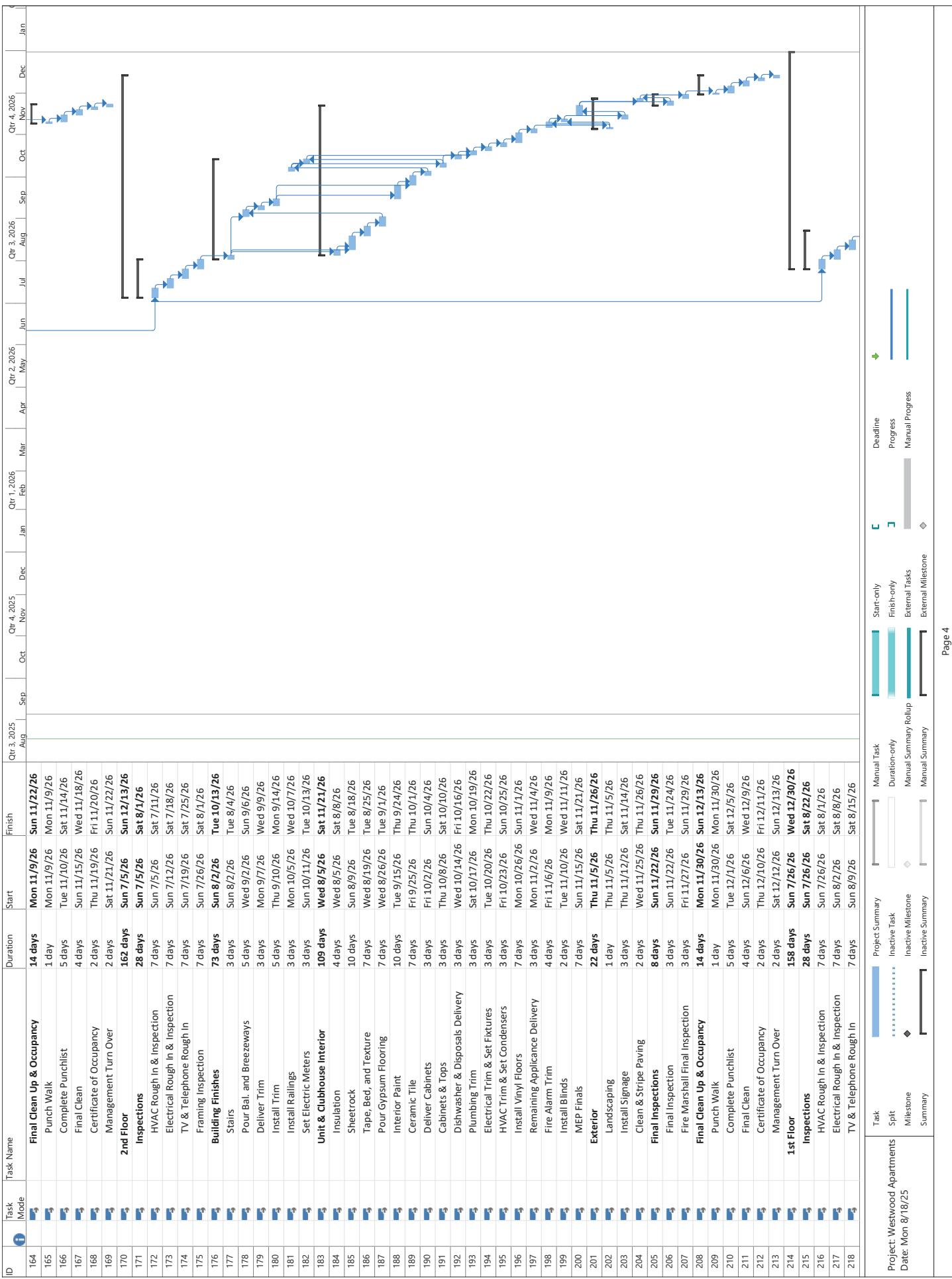
ID	Task Name	Duration	Start	Finish	Predect%	Comp		Qtr 1, 2024		Qtr 2, 2024		Qtr 3, 2024		Qtr 4, 2024		Qtr 1, 2025		Qtr 2, 2025		Qtr 3, 2025			
						Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	
80	Owner Redlines, Value Engineering, and City Permit Comments (Delayed to include City Comments Upon Plat Approval)	66 days	Tue 2/11/25	Tue 5/13/25	79	100%																	
81	Full Plan Set - Issue #2	34 days	Wed 5/14/25	Mon 6/30/25	80	100%																	
82	City Permit Resubmission and Review #2	12 days	Tue 7/1/25	Wed 7/16/25	100%																		
83	Full Plan Set - Issue #3	10 days	Thu 7/17/25	Wed 7/30/25	82	100%																	
84						0%																	
85	CONSTRUCTION CONTRACT	141 days	Tue 2/11/25	Tue 8/26/25	89%																		
86	Request for Proposals Issued to Multiple GCs	1 day	Tue 2/11/25	Tue 2/11/25	79	100%																	
87	RFP Q&A	16 days	Wed 2/12/25	Wed 3/5/25	86	100%																	
88	Architect and Owner Responses	3 days	Mon 3/3/25	Wed 3/5/25	87	100%																	
89	GC Bids due	12 days	Thu 3/6/25	Fri 3/21/25	87,88	75%																	
90	Owner Review / Finalize Budget with GC	11 days	Mon 3/24/25	Mon 4/7/25	89	100%																	
91	GC Clarification Meeting & Subsequent Pricing Revision	6 days	Tue 4/8/25	Tue 4/15/25	90	100%																	
92	Additional Developer Value Engineering & Design Updates	26 days	Wed 4/16/25	Wed 5/21/25	91	100%																	
93	GC Selection	1 day	Thu 5/22/25	Thu 5/22/25	92	100%																	
94	Budget & Contract Negotiations	50 days	Fri 5/23/25	Thu 7/31/25	93	100%																	
95	GC AIA Contract	68 days	Fri 5/23/25	Tue 8/26/25	93	69%																	
96	Contract Review	39 days	Fri 5/23/25	Wed 7/16/25		90%																	
97	Final SOV	4 days	Fri 8/1/25	Wed 8/6/25	94	100%																	
98	Final Contract Exhibits	7 days	Thu 8/7/25	Fri 8/15/25	97	0%																	
99	GC Bond & Insurance	5 days	Mon 8/18/25	Fri 8/22/25	97,98	0%																	
100	Final Contract	2 days	Mon 8/25/25	Tue 8/26/25	99	10%																	
101																							
102	FINANCING	214 days	Fri 11/8/24	Wed 9/3/25	78%																		
103	Initial Discussions With Potential Lenders & Equity Investors	52 days	Fri 11/8/24	Mon 1/20/25		2%																	
104	Tax Credit Equity Syndicator Term Sheet	118 days	Mon 1/20/25	Wed 7/2/25		100%																	
105	Permanent & Construction Lender Term Sheet	57 days	Wed 1/15/25	Thu 4/3/25		100%																	
106	Plan & Cost Review	40 days	Thu 7/3/25	Wed 8/27/25	104	75%																	
107	Equity Due Diligence	45 days	Thu 7/3/25	Wed 9/3/25	104	80%																	
108	Final Proforma/Budget	30 days	Thu 7/3/25	Wed 8/13/25	104	90%																	
109	Loan Docs	40 days	Thu 7/3/25	Wed 8/27/25	104	75%																	
110	LPA Agreement	40 days	Thu 7/3/25	Wed 8/27/25	104	75%																	

EXHIBIT B









The Gantt chart illustrates the project timeline across four quarters (Qtr 1, Qtr 2, Qtr 3, Qtr 4) from 2025 to 2026. The tasks are color-coded by category:

- Building Finishes** (Blue): Includes Framing Inspection, Stains, Pour Bal. and Breezeways, Deliver Trim, Install Trim, Install Railings, Set Electric Meters, and Unit & Clubhouse Interior.
- Interior Work** (Red): Includes Insulation, Sheetrock, Tape, Bed, and Texture, Pour Gypsum Flooring, Interior Paint, Ceramic Tile, Deliver Cabinets, Cabinets & Tops, Dishwasher & Disposals Delivery, Plumbing Trim, Electrical Trim & Set Fixtures, HVA/C Trim & Set Condensers, Install Vinyl Floors, Remaining Appliance Delivery, Fire Alarm Trim, Install Blinds, MFP Finals, and Exterior Landscaping.
- Exterior Work** (Green): Includes Final Signage, Clean & Stripe Paving, Final Inspections, Fire Marshal Final Inspection, Final Clean Up & Occupancy, Punch Walk, Complete Punchlist, Final Clean, Certificate of Occupancy, Management Turn Over, and Project Closeout.

Key milestones include the completion of the Unit & Clubhouse Interior (Week 10), the start of the Fire Marshal Final Inspection (Week 14), and the final punchlist and occupancy certificate in Week 17.

ID	Task	Name	Mode	Start	Finish	Duration	Category
219		Framing Inspection	Normal	Sun 8/16/25	Sat 8/22/25	7 days	Building Finishes
220		Building Finishes	Normal	Sun 8/23/25	Fri 10/30/25	69 days	
221		Stains	Normal	Sun 8/23/25	Tue 8/25/25	3 days	Building Finishes
222		Pour Bal. and Breezeways	Normal	Sun 8/23/25	Wed 9/23/25	5 days	Building Finishes
223		Deliver Trim	Normal	Sun 8/23/25	Thu 10/1/25	5 days	Building Finishes
224		Install Trim	Normal	Sun 8/23/25	Mon 10/5/25	3 days	Building Finishes
225		Install Railings	Normal	Sun 8/23/25	Thu 10/22/25	3 days	Building Finishes
226		Set Electric Meters	Normal	Sun 8/23/25	Wed 10/28/25	3 days	Building Finishes
227		Unit & Clubhouse Interior	Normal	Sun 8/23/25	Wed 8/26/25	105 days	
228		Insulation	Normal	Sun 8/23/25	Wed 8/26/25	4 days	Interior Work
229		Sheetrock	Normal	Sun 8/23/25	Tue 9/18/25	10 days	Interior Work
230		Tape, Bed, and Texture	Normal	Sun 8/23/25	Tue 9/15/25	7 days	Interior Work
231		Pour Gypsum Flooring	Normal	Sun 8/23/25	Wed 9/16/25	7 days	Interior Work
232		Interior Paint	Normal	Sun 8/23/25	Thu 10/15/25	10 days	Interior Work
233		Ceramic Tile	Normal	Sun 8/23/25	Fri 10/16/25	3 days	Interior Work
234		Deliver Cabinets	Normal	Sun 8/23/25	Mon 10/19/25	3 days	Interior Work
235		Cabinets & Tops	Normal	Sun 8/23/25	Mon 10/23/25	3 days	Interior Work
236		Dishwasher & Disposals Delivery	Normal	Sun 8/23/25	Mon 10/31/25	3 days	Interior Work
237		Plumbing Trim	Normal	Sun 8/23/25	Tue 11/3/25	3 days	Interior Work
238		Electrical Trim & Set Fixtures	Normal	Sun 8/23/25	Fri 11/6/25	3 days	Interior Work
239		HVA/C Trim & Set Condensers	Normal	Sun 8/23/25	Sun 11/8/25	3 days	Interior Work
240		Install Vinyl Floors	Normal	Sun 8/23/25	Thu 11/12/25	7 days	Interior Work
241		Remaining Appliance Delivery	Normal	Sun 8/23/25	Thu 11/19/25	3 days	Interior Work
242		Fire Alarm Trim	Normal	Sun 8/23/25	Mon 11/23/25	4 days	Interior Work
243		Install Blinds	Normal	Sun 8/23/25	Fri 11/27/25	2 days	Interior Work
244		MFP Finals	Normal	Sun 8/23/25	Wed 12/2/25	7 days	Interior Work
245		Exterior	Normal	Sun 8/23/25	Sun 11/22/25	22 days	
246		Landscaping	Normal	Sun 8/23/25	Thu 11/22/25	1 day	Exterior
247		Final Signage	Normal	Sun 8/23/25	Sat 11/28/25	3 days	Exterior
248		Clean & Stripe Paving	Normal	Sun 8/23/25	Sat 12/12/25	2 days	Exterior
249		Final Inspections	Normal	Sun 8/23/25	Wed 12/9/25	8 days	
250		Final Inspection	Normal	Sun 8/23/25	Wed 12/9/25	3 days	Final Inspections
251		Fire Marshal Final Inspection	Normal	Sun 8/23/25	Wed 12/14/25	3 days	Final Inspections
252		Final Clean Up & Occupancy	Normal	Sun 8/23/25	Thu 12/17/25	14 days	
253		Punch Walk	Normal	Sun 8/23/25	Thu 12/17/25	1 day	Final Clean Up & Occupancy
254		Complete Punchlist	Normal	Sun 8/23/25	Fri 12/18/25	5 days	Final Clean Up & Occupancy
255		Final Clean	Normal	Sun 8/23/25	Sat 12/26/25	4 days	Final Clean Up & Occupancy
256		Certificate of Occupancy	Normal	Sun 8/23/25	Sun 12/27/25	2 days	Final Clean Up & Occupancy
257		Management Turn Over	Normal	Sun 8/23/25	Mon 12/28/25	1 day	Final Clean Up & Occupancy

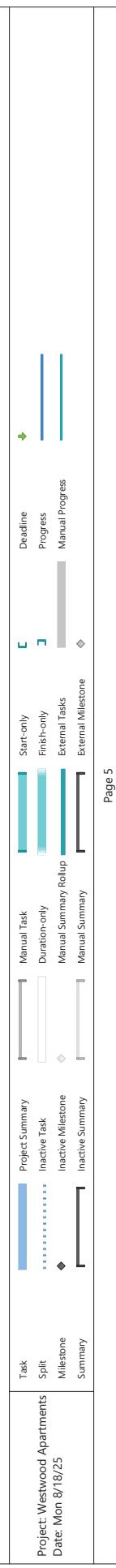


EXHIBIT C



RBC Capital Markets
RBC Community Investments
600 Superior Avenue, Suite 2300
Cleveland, Ohio 44114
Telephone: (216) - 875-2626
Fax: (216) - 875-2612

August 14, 2025

Cody Campbell
Director of Multifamily Finance
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701

**RE: Westwood Apartments (TDHCA #24175) – Support for Placed in Service Extension
Pursuant to Section 11.6(5) Force Majeure**

Dear Mr. Campbell:

On behalf of RBC Community Investments, we write in support of a request submitted by the development team for Westwood Apartments, a 102-unit affordable community in Killeen, Texas, seeking an extension of the Placed in Service (PIS) deadline for its 2024 9% Housing Tax Credit award.

We have completed our due diligence and underwriting associated with our participation in the financing of this important development, which will deliver much needed affordable housing for elderly households in the Killeen community. We remain committed to working with the development team to bring this project to closing and are scheduled to close on September 5, 2025, pending final Board approval, which is a condition of closing.

An extension would provide the flexibility needed to proceed confidently with financial closing while maintaining the high standards required by all parties. Our upper-tier investor requires a three-month cushion in the construction and PIS schedule to allow for unforeseen construction delays.

We appreciate your consideration of this request and your continued support for developments like Westwood Apartments that serve elderly Texans seeking decent, safe, and affordable housing. Please do not hesitate to contact me at Daniel.Kierce@cbc.com or 216.536.6688 with any questions regarding our role in the project or this request.

Sincerely,

A handwritten signature in black ink, appearing to read "DJK".

Daniel J Kierce
Managing Director, Head of Originations
RBC Community Investments