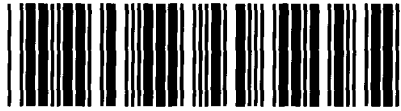


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PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

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FORMAL COMPLAINT OF KER-SEVA  
LTD. AGAINST THE CITY OF FRISCO,  
TEXAS

§  
§  
§

BEFORE THE  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**ADC WEST RIDGE, L.P. AND CENTER FOR HOUSING RESOURCES, INC.'S  
RESPONSES TO CITY OF FRISCO'S THIRD SET OF REQUESTS FOR  
INFORMATION AND REQUESTS FOR ADMISSION**

ADC West Ridge, L.P. and Center for Housing Resources, Inc. ("Complainants") file these Responses to City of Frisco's ("Frisco") Third Set of Requests for Information ("RFI") and Requests for Admission, which was filed with the Public Utility Commission of Texas and served on ADC West Ridge, L.P. and Center for Housing Resources, Inc. on November 4, 2016. These responses are timely filed. ADC West Ridge, L.P. and Center for Housing Resources, Inc. agree and stipulate that all parties may treat these responses as if the answers were filed under oath. Complainants and Frisco agreed to amend some of the requests which are reflected herein.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: Mallory Beck  
Leonard Dougal - State Bar No. 06031400  
Ali Abazari - State Bar No. 00796094  
Mallory Beck - State Bar No. 24073899  
100 Congress, Suite 1100  
Austin, Texas 78701  
E: ldougal@jw.com  
T: (512) 236 2000  
F: (512) 391-2112

ATTORNEYS FOR COMPLAINANTS  
ADC WEST RIDGE L.P., AND CENTER FOR  
HOUSING RESOURCES, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing document was served as shown below on  
this 28th day of November 2016:

Art Rodriguez  
Russell & Rodriguez, L.L.P.  
1633 Williams Dr., Bldg. 2, Suite 200  
Georgetown, Texas 78268  
arodriguez@txadminlaw.com  
**Attorney for City of Frisco**

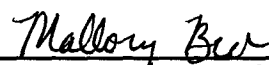
*Via email and U.S. First Class Mail*

Richard Abernathy  
Abernathy Roeder Boyd & Hullett, P.C.  
1700 Redbud Boulevard, Suite 300  
McKinney, Texas 75069  
rabernathy@abernathy-law.com  
**Attorney for City of Frisco**

*Via email and U.S. First Class Mail*

Sam Chang  
Attorney – Legal Division  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P. O. Box 13326  
Austin, Texas 78711-3326  
sam.chang@puc.texas.gov  
**Attorney for Public Utility Commission of Texas**

*Via email and U.S. First Class Mail*

  
\_\_\_\_\_  
Mallory Beck

PUC DOCKET NO. 45870  
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FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 195.** Please produce all documents that relate to communications, written or oral, with Frisco, including, but not limited to Stacy Brown and John Lettelleir, requesting a meeting to gain support and financing for a 9% tax credit application to the TDHC and all documents relating to the response from Frisco, including, but not limited to, Stacy Brown and John Lettelleir.

**RESPONSE:**

Please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 135, and 136.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
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<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS.</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 196:** Please identify your efforts to contact representatives of Frisco regarding the Property or the basis of your complaint against Frisco in this docket. Please produce all documents that relate to such effort.

**RESPONSE:**

Subject to Complainants' objections, Complainants attempted to communicate with representatives of Frisco via e-mail, telephone, regular mail, and in person beginning in early 2015 and continuing through the present. Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed and bates labeled ADC01704-01718.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 197:** Please identify your efforts to contact Susan Fletcher regarding the Property or the basis of your complaint against Frisco in this docket. Please produce all documents that relate to such effort.

**RESPONSE:**

Subject to Complainants' objections, Complainants' representative, Terri Anderson, communicated with Ms. Fletcher through e-mail and in person. Please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents produced herein and bates labeled ADC01719-01733.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 198:** Please identify all communications with Susan Fletcher regarding the Property or the basis of your complaint against Frisco in this docket. Please produce all documents that relate to such communications.

**RESPONSE:**

Subject to Complainants' objection and pursuant to 16 Tex. Admin. Code § 22.144(e), please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and 197.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
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**Frisco RFI 199:** Please state the factual basis for your contention that that Frisco “unexpectedly called and held an unnecessary public hearing on the West Ridge Villas 9% Tax Credit Application.” Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants’ objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.



**PUC DOCKET NO. 45870**  
**SOAH DOCKET NO. 473-16-4619:WS**

<b>FORMAL COMPLAINT OF KER-SEVA</b>	<b>§</b>	<b>BEFORE THE</b>
<b>LTD. AGAINST THE CITY OF FRISCO,</b>	<b>§</b>	<b>STATE OFFICE OF</b>
<b>TEXAS</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 200:** Please state the factual basis for your contention that Stacy Brown promised to place "affordable developments" on the February 13, 2015 agenda of the Frisco City Council. Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA	§	BEFORE THE
LTD. AGAINST THE CITY OF FRISCO,	§	STATE OFFICE OF
TEXAS	§	ADMINISTRATIVE HEARINGS

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 201:** Please produce all documents that relate to any "revised design exhibits" that were submitted to John Lettelleir or Stacy Brown for review and a meeting on or about February 20, 2015.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
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**Frisco RFI 202:** [AMENDED AS AGREED]: Please ~~produce~~ state the factual basis for your contention that on February 24, 2015, John Lettelleir stated or indicated that he would not have time to review the submission of February 20, 2015 by you before the Frisco City Council meeting on March 20, 2015 because he didn't want to "expend staff resources" before Frisco City Council input. Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
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FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
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**Frisco RFI 203:** [AMENDED AS AGREED]: Please identify state the factual basis for your contention that Frisco beginning in March 2015 "refused requests for a pre-construction meeting, any meeting with city staff, or even an administrative review of the proposed preliminary site plan [or] a Preliminary Plat application." Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
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FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
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**Frisco RFI 204:** [AMENDED AS AGREED]: Please ~~identify~~ state the factual basis for your contention that on or about March 2, 2015 "Frisco failed to support the 9% HTC Application stating they could not support a development that would not otherwise be approved if it were not a tax credit deal due to the site being less than 5 acres as required by MF-19 zoning requirements." Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
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**Frisco RFI 205:** Please state the factual basis for your contention that on or about March 2, 2015, Frisco took action to "preempt any 'vested rights' and prevent the proposed MF-19 affordable development." Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
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**Frisco RFI 206:** Please state the factual basis for your contention that on or about March 2, 2015, the Frisco City Council "modified the draft Consolidated Plan originally presented at the February 17, 2015 meeting moving the subject property from the ETJ into the city limits and showing future planned land use as single family." Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
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<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
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**Frisco RFI 207:** Please state the factual basis for your contention that on or about March 16, 2015, Frisco did not make available to the Plaintiff any application or processes that would establish vested rights. Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.



**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
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**Frisco RFI 208:** Please state the factual basis that relate to your contention that on or about March 2, 2015 a "Preliminary Plat is not required by the [Frisco] Subdivision Ordinance for commercial construction." Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 209:** All documents that relate to Frisco staff's comments to the Preliminary Plat submitted by you for the Property or any part thereof.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. and Center for Housing Resources, Inc.
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PUC DOCKET NO. 45870  
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 210:** [AMENDED AS AGREED]: Please ~~identify~~ state the factual basis for your contention that you submitted all revisions to the Preliminary Plat for the Property or any part thereof before 12:00 pm on March 3, 2015. Please produce all documents that relate to such contention.

**RESPONSE:**

Subject to Complainants' objections, please see the documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 211:** Please produce all documents that you received from Collin County in response to any Public Information Request made by you to Collin County.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents produced herein bates labeled ADC01734-01740.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 212:** Please produce all documents that relate to your request for permit applications from Collin County for the Property or any part thereof.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 213:** Please produce all documents that relate to your request for permit applications from Frisco for the Property or any part thereof.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11; 12, 14, 15, and 118 and documents produced herein bates labeled ADC01741-01745.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 214:** [WITHDRAWN]: Please produce all documents that relate to your request for permit applications from Collin County for the Property or any part thereof.

**RESPONSE:**

By agreement, this Request was withdrawn.

Prepared by/sponsored by:   None

**PUC DOCKET NO. 45870  
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 215:** Please produce documents that relate to your request for permit applications from the City of McKinney, Texas for the Property or any part thereof.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, and in response to Order No. 3.

Prepared/Sponsored by:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. and Center for Housing Resources, Inc.
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**PUC DOCKET NO. 45870**  
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<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 216:** Please produce all documents that relate to communications between Plaintiff and George Hill regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Discovery is ongoing, and Complainants will supplement this response.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 217:** Please produce all documents that relate to communications between you and Rick Dwoarshack regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118, 119, and 120.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 218:** Please produce all documents that relate to communications between you and Luis Gonzales regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein bates labeled ADC01746-01749.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 219:** Please produce all documents that relate to communications between you and Tracy Homfield regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118 and documents enclosed herein bates labeled ADC01750-01756.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 220:** Please produce all documents that relate to communications between you and Amy Matthews regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 221:** Please produce all documents that relate to communications between you and Toyin Fawehinmi regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, 118; and in response to Order No. 3.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 222:** Please produce all documents that relate to communications between you and Jastinder Jawanda regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 2, 3, 10, 11, 12, 13, 14, and 15.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 223:** Please produce all documents that relate to communications between you and Nell Lange regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.



**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS.**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 224:** Please produce all documents that relate to communications between you and Chris Goulette regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 225:** All documents that relate to communications between you and Frisco Utility Billing Department regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 226:** All documents that relate to communications between you and Weir Brothers Contracting, LLC. regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 227:** All documents that relate to communications between you and KWA Construction regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.,

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 228:** All documents that relate to communications between you and Joe Thomason regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 229:** All documents that relate to communications between you and the City of McKinney regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Discovery is ongoing, and Complainants will supplement this response.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION.**

**Frisco RFI 230:** All documents that relate to communications between you and the City of McKinney Police Department regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 231:** All documents that relate to communications between you and Randy Roland regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.



**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 232:** All documents that relate to communications between you and the City of McKinney Engineering Department regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118. Discovery is ongoing, and Complainants will supplement this response.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 233:** All documents that relate to communications between you and Chris Hill regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 234:** All documents that relate to communications between you and Stan Fulk regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118, and documents enclosed herein bates labeled ADC01757-01760.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA	§	BEFORE THE
LTD. AGAINST THE CITY OF FRISCO,	§	STATE OFFICE OF
TEXAS,	§	ADMINISTRATIVE HEARINGS

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 235:** All documents that relate to communications between you and Ryan Hahn regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 236:** All documents that relate to communications between you and John Conine regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

After a diligent search, no responsive documents were located.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 237:** All documents that relate to communications between you and Wesley and/or Susan Williams regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870  
SOAH DOCKET NO. 473-16-4619.WS**

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**KER-SEVA, LTD.; ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S THIRD SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 238:** All documents that relate to communications between you and Timothy and/or Teresa Legat regarding the Property or the basis of the complaint that is the subject of this proceeding.

**RESPONSE:**

Subject to Complainants' objections, please see documents produced in response to RFI Nos. 11, 12, 14, 15, and 118.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

