

From: Erika Graham [REDACTED] 
Subject: Formal Request for Compliance Review — Woodhaven Community Development, Inc.
Date: July 27, 2026 at 12:52 PM
To: Olga.Nowlan@fortworthtexas.gov
Cc: engagement@fortworthtexas.gov, District5@fortworthtexas.gov, Peoples, Deborah Deborah.Peoples@fortworthtexas.gov

Ms. Nowlan:

I am writing to request a formal review of the registration status, governance, activities and representational authority of Woodhaven Community Development, Inc. ("WCD"), which the City currently recognizes as a voluntary Neighborhood Redevelopment Organization.

This request is not based merely on disagreement with a position taken by WCD. It concerns whether WCD has complied with the City's minimum requirements for registered redevelopment organizations and whether City officials have relied upon advocacy by WCD without verifying its governance, membership, authorization or community accountability.

Absence of required general membership meetings

The City's Registration Guidelines for Community Organizations require a registered redevelopment organization to:

- Adopt bylaws and provide them to the Community Engagement Office;
- Clearly define its boundaries in its bylaws;
- Hold at least one general membership meeting each year;
- Provide an annual January update containing contact, meeting and membership information; and
- Maintain documentation demonstrating compliance with the registration requirements.

To my knowledge, WCD has not held or publicly announced a general membership meeting at any time at least 2 years prior to and since its federal tax-exempt status was reinstated in February 2025. I am also unaware of:

- Any opportunity for Woodhaven residents or stakeholders to join WCD;
- Any notice identifying who qualifies as a WCD member;
- Any notice, agenda, attendance record or minutes for a WCD general membership meeting;
- Any election or appointment process for its current leadership;
- Any public report of WCD's activities;
- Any disclosure of its board composition; or
- Any mechanism through which the Woodhaven community may participate in or hold WCD accountable for its decisions.

The City's online database nevertheless states that WCD holds meetings on the fourth Wednesday of each month. That listing contains conflicting information, stating both "monthly at 5 p.m." and a meeting time of "8:45 a.m." It also identifies no officer-election month or next election year.

If WCD has not actually held the meetings represented in the City's database, the listing is materially inaccurate and should not continue to be relied upon by City departments for outreach or community-engagement purposes.

IRS revocation and timing of renewed advocacy

The IRS record I obtained reflects that WCD's federal tax-exempt status was automatically revoked in 2018 and was not reinstated until February 2025.

Despite that prolonged period of revocation, WCD reemerged as an advocate concerning the former Woodhaven golf course immediately before its reinstatement. On January 4, 2025, WCD submitted a letter supporting Crescendo Development's requested rezoning of the property. That letter was then presented to the City as organizational support for the proposed redevelopment.

The timing does not, by itself, prove that the reinstatement or advocacy was improper. It does raise legitimate questions about:

- Whether WCD was actively functioning during the period of revocation;

- Whether it held meetings or maintained an active governing board;
- Who authorized its January 2025 support letter;
- Whether a board meeting and vote occurred;
- Whether the officers signing or presenting the letter possessed current authority;
- Whether WCD had members who were consulted;
- Whether its advocacy reflected an organizational decision or the views of selected individuals; and
- Whether WCD was fulfilling its stated redevelopment mission before being relied upon as a community stakeholder.

No identified authority making the Woodhaven Neighborhood Association (“WNA”) WCD’s communications arm

I am also concerned that WNA may have been treated by WCD, the City or City consultants as WCD’s communications or community-engagement arm.

I have found no authority supporting such an arrangement.

The WNA bylaws state only that the WNA president, or a designee, serves as **WNA’s liaison to WCD** and represents **WNA** in meetings or activities involving WCD. That language authorizes a WNA representative to communicate with WCD on WNA’s behalf. It does not state that:

- WNA speaks for WCD;
- WNA serves as WCD’s communications arm;
- WNA members are WCD members;
- WNA meetings substitute for WCD meetings;
- WNA may satisfy WCD’s annual membership-meeting requirement;
- WNA may perform WCD’s required community outreach;
- WCD may rely on WNA to authorize WCD’s lobbying or advocacy; or
- Communications with selected WNA officers constitute engagement by WCD with the broader Woodhaven community.

The City’s policy treats WNA and WCD as separate organizations. It encourages redevelopment organizations to consult with registered neighborhood organizations on projects affecting a neighborhood. Consultation between two separate organizations is not the same as one organization serving as the communications arm of the other.

If the City, WCD or City consultants have treated WNA as WCD’s communications or engagement arm, please identify the WCD bylaw provision, board resolution, agreement, City policy or other authority supporting that arrangement.

Requested compliance review

I respectfully request that the Community Engagement Office require WCD to provide documentation establishing:

1. Its current bylaws and stated mission;
2. Its current membership requirements and membership list or membership count;
3. The notices, agendas, attendance records and minutes for every general membership meeting held since February 2025;
4. The dates, locations and attendance records for the monthly meetings represented in the City’s database;
5. Its annual updates submitted to Community Engagement for 2025 and 2026, including the contact, meeting and membership information provided;
6. Its complete current board and officer roster;
7. The manner and date on which each current director and officer was elected or appointed;
8. Its officer-election procedures, election dates and records;

9. The board minutes, resolution or other authorization approving WCD's January 4, 2025 letter supporting Zoning Case ZC-24-147;
10. The records authorizing any subsequent WCD advocacy concerning the former golf course, the Conservation Plan, TIF District 13 or related redevelopment matters;
11. Documentation of the community-development activities, programs or services WCD has performed since February 2025;
12. Any agreement or authority under which WNA has been treated as WCD's communications or community-engagement arm; and
13. Documentation establishing that WCD currently complies with the City's registration requirements for a Neighborhood Redevelopment Organization.

Requested City action

Until this review is completed, I respectfully request that the City:

- Not characterize WCD's advocacy as evidence of Woodhaven neighborhood support or community consensus;
- Identify WCD statements only as positions taken by WCD's named officers unless proper organizational authorization is established;
- Not treat consultation with WNA as a substitute for WCD's separate meeting, membership and community-engagement obligations;
- Correct or annotate the City's online listing if its monthly meeting information cannot be verified;
- Preserve this notice in the City's records concerning WCD, ZC-24-147, the Woodhaven Conservation Plan, TIF District 13 and the golf-course redevelopment; and
- Apply the noncompliance procedure contained in the City's registration guidelines if WCD cannot provide the required documentation.

The City's registration policies state that registered organizations must maintain documentation of compliance. When noncompliance is alleged, Community Engagement may request that documentation. If an organization cannot document compliance or fails to come into compliance, it may be deemed inactive and lose the benefits of City registration.

This is therefore not a request that Community Engagement intervene in a private disagreement. It is a request that the City enforce its own objective registration requirements and verify the authority of an organization upon which City departments have relied for community input.

Please confirm that a compliance review will be opened and advise me of the results when that review has been completed.

Thank you for your attention.

Regards,

Erika Graham



**WCD_City_Email_Supporting_
Documents.zip**

