

OCCC CASE NO. L25-071

IN THE MATTER OF:	§	BEFORE THE
	§	
MASTER FILE NO.: 17884	§	OFFICE OF CONSUMER
GAI IRA PROPERTY TAX	§	
ADVANTAGE LLC	§	CREDIT COMMISSIONER
2200 N. LOOP W., STE. 350	§	
HOUSTON, TEXAS 77018	§	STATE OF TEXAS

**ORDER TO FILE TIMELY AND ACCURATE ANNUAL REPORTS**

The Office of Consumer Credit Commissioner (“OCCC”) issues this Order to File Timely and Accurate Annual Reports against GAI IRA Property Tax Advantage LLC (“GAI IRA Property Tax”).<sup>1</sup>

**Statement of Facts and Law**

GAI IRA Property Tax is a property tax lender licensed by the OCCC under Chapter 351 of the Texas Finance Code. GAI IRA Property Tax operates under master file number 17884 at one licensed location, under license number 65772. GAI IRA Property Tax’s compliance officer is Tonya Felix, Attorney, and its designated contact address is 2200 N. Loop W., Ste. 350, Houston, Texas 77018.

A property tax lender must file annual reports with the OCCC.<sup>2</sup> A property tax lender must comply with all instructions from the OCCC relating to submitting the report.<sup>3</sup> The report is due by March 31 of each year for the prior calendar year’s loan activity.<sup>4</sup>

GAI IRA Property Tax did not file its 2024 annual report with the OCCC on or before March 31, 2025.

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<sup>1</sup> Tex. Fin. Code § 14.208.

<sup>2</sup> Tex. Fin. Code § 351.164; 7 Tex. Admin. Code § 89.404.

<sup>3</sup> 7 Tex. Admin. Code § 89.404.

<sup>4</sup> 7 Tex. Admin. Code § 89.404; <https://occc.texas.gov/industry/property-tax-lenders/property-tax-lenders-annual-reports>

The Consumer Credit Commissioner (“Commissioner”) may issue an injunction ordering a property tax lender to file one or more complete, accurate, and timely annual reports if the Commissioner has reasonable cause to believe that the property tax lender is violating Chapter 351 of the Texas Finance Code.<sup>5</sup>

The Commissioner has reasonable cause to believe that GAI IRA Property Tax is violating Chapter 351 of the Texas Finance Code, and therefore issues this Order, because GAI IRA Property Tax failed to timely file its 2024 annual report.

## **Order**

IT IS ORDERED that GAI IRA Property Tax Advantage LLC:

1. comply with, and cease and desist from violating, the reporting requirements set forth in Section 351.164 of the Texas Finance Code and Title 7, Section 89.404 of the Texas Administrative Code;
2. file its 2024 annual report within 30 days after the date of this Order, if it has not already done so; and
3. timely file complete and accurate future annual reports.

Property tax lender annual reports must be submitted through the OCCC’s Application Licensing Examination and Compliance System (ALECS): [alecs.occctexas.gov](https://alecs.occctexas.gov). Instructions are available by clicking the “File Annual Report” button on the OCCC’s home page, [occctexas.gov](https://occctexas.gov).

## **Violation of Order**

If you violate this Order, the OCCC may impose an administrative penalty of up to \$1,000 for each day.<sup>6</sup> Multiple violations may also result in the suspension or revocation of your license.<sup>7</sup>

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<sup>5</sup> Tex. Fin. Code § 14.208.

<sup>6</sup> Tex. Fin. Code § 14.208(c).

<sup>7</sup> Tex. Fin. Code § 351.156.

## Right to Request Hearing

You have the right to request a hearing regarding this Order.<sup>8</sup> To request a hearing, you must send a written hearing request to the OCCC no later than 30 days after the date of this Order.<sup>9</sup> You must send your request to Vivek Vedanarayanan, Assistant General Counsel, by mail to 2601 N. Lamar Blvd., Austin, Texas 78705, or by email to [vivek.vedanarayanan@occc.texas.gov](mailto:vivek.vedanarayanan@occc.texas.gov).

If you request a hearing, a hearing on this matter will be set and conducted in accordance with Chapter 2001 of the Texas Government Code.<sup>10</sup> If you fail to request a hearing by the deadline, this Order will be considered final and enforceable.<sup>11</sup>

All communications with the OCCC concerning this matter must be through Vivek Vedanarayanan, Assistant General Counsel, who may be contacted by mail at 2601 N. Lamar Blvd., Austin, Texas 78705, by telephone at 512-936-7623, or by email at [vivek.vedanarayanan@occc.texas.gov](mailto:vivek.vedanarayanan@occc.texas.gov).

Signed this 6th day of June, 2025.

/s/Leslie Pettijohn  
Leslie L. Pettijohn  
Consumer Credit Commissioner  
State of Texas

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<sup>8</sup> Tex. Fin. Code § 14.208(b).

<sup>9</sup> Tex. Fin. Code § 14.208(b).

<sup>10</sup> Tex. Fin. Code § 14.208(b).

<sup>11</sup> Tex. Fin. Code § 14.208(c).

## CERTIFICATE OF SERVICE

I certify that on June 6, 2025, a true and correct copy of this Order to File Timely and Accurate Annual Reports has been sent to GAI IRA Property Tax Advantage LLC by the following:

GAI IRA Property Tax Advantage LLC  
Attn: Tonya Felix, Attorney,  
Compliance Officer  
2200 N. Loop W., Ste. 350  
Houston, TX 77018  
tfelix@poconnor.com

- ☒ email
- ☐ eFileTexas.gov electronic service
- ☒ regular mail
- ☒ certified mail, return receipt requested  
# 9214 8901 9403 8300 0011 2534 18

GAI IRA Property Tax Advantage LLC  
Attn: Lawyer's Aid Service Inc.,  
Registered Agent  
408 W. 17th St., Ste. 101  
Austin, TX 78701

- ☐ email
- ☐ eFileTexas.gov electronic service
- ☒ regular mail
- ☒ certified mail, return receipt requested  
# 9214 8901 9403 8300 0011 2534 25

/s/ Vivek V. Vedanarayanan

Vivek V. Vedanarayanan  
Assistant General Counsel  
Office of Consumer Credit Commissioner  
State Bar No. 24127068  
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