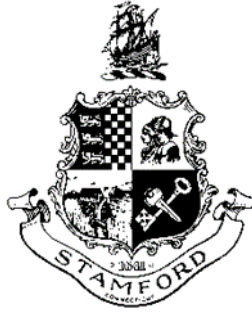


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June 23, 2023

Representative Bonnie Kim Campbell
c/o Board of Representatives
888 Washington Boulevard
Stamford, CT 06901

Dear Ms. Kim Campbell,

You have requested an Advisory Opinion from the City of Stamford Board of Ethics (“Board”).

You have informed the Board that you are a member of the Stamford Board of Representatives’ sub-committee that votes on the Community Development Annual Allocation Plan created by the Stamford Community Development Office, a department within the City of Stamford government that administers federal housing assistance for Stamford’s neighborhoods. We thank you for your service to the City of Stamford and for your request of an Advisory Opinion.

You asked the Board for an opinion regarding your role in voting on the Community Development Annual Allocation Plan as it relates to a community development block grant application submitted by New Neighborhoods, the owner and management company for the building in which you reside, in connection with elevator renovation work required in the building. You are seeking an exception from the federal Housing and Urban Development conflict of interest rules, one requirement of which is that you obtain an Advisory Opinion from the Board confirming that the manner in which you have recused yourself from discussions and votes on the project does not violate the Stamford Code of Ethics (“Code”).

We look to the Code’s Sec. 19-4, Conflicts of interests, which states that “to avoid the appearance and risk of impropriety, a city officer or employee shall not take any official action that such person knows is likely to affect the economic interests of the officer or such person’s outside clients.” Further, pursuant to Sec. 19-4 C. 1 of the Code, “An action is likely to affect an economic interest if it is likely to have an effect on that interest that is distinguishable from its effect on members of the public in general or a substantial segment thereof....”

Under the facts presented to the Board, the building improvement at issue will not benefit you alone, but all those currently residing in the building and who may come to live there in the future. Therefore, we find no conflict of interest under 19-4.¹

We then look to the Code's Sec. 19-5, Prohibited interests, which states that "A city officer or employee may not use such person's official position to advance or impede private interests, or to grant or secure..... any form of special consideration, treatment, exemption, or advantage." The planned work is being undertaken in the usual course of regular and appropriate building maintenance and, under the facts presented, you did not use your position on the Board of Representatives or take any official action to seek or promote the renovation work in your building.

The Board's Advisory Opinion is that, taking all of the above into account, there has been no violation of the Code. The Board recognizes that, in order to avoid any possible appearance of impropriety, you prophylactically recused yourself from any discussions and votes on this particular block grant application in your role on the Community Development Annual Allocation Plan. We appreciate you acting with the utmost caution in this matter by taking those steps.

This Advisory Opinion is a public document. The opinions stated herein are expressly based on the accuracy and completeness of the information presented to the Board and are confined to the specifics of the question(s) put to the Board in rendering such opinions. The Board wishes to emphasize that its finding pertains only to your specific circumstances, and should not be construed as precedent for any future requests for an Advisory Opinion or complaint filed with the Board.

Sincerely,



Allan D. Lang, Chair
Board of Ethics

Cc: City & Town Clerk's Office

¹ For the avoidance of any doubt, the Board's Advisory Opinion does not address the situation where the community block development grant moneys could be diverted from another project to benefit the building in which you reside. The Board of Ethics' opinion under such circumstances could well be different.