



Interoffice

Correspondence



To: Homebuyer Assistance Program

From: Kennisha London
Compliance & Grants Administration

Attn:

Date: December 17, 2024

**Subject: Conflict of Interest Legal Analysis Results –
Angela Gaddis**

The Housing and Community Development Department (HCDD) requested the Legal Department's Assigned Attorney to perform a legal analysis on Angela Gaddis to confirm if a potential conflict of interest exists. The below contains the outcome of the legal analysis.

Issue/Questions Presented

Whether there is a Conflict of Interest in the City Employee benefiting from the City's Homebuyer Assistance Program when their duties are designated to the City Department?

Conclusion

In light of the foregoing, the OCA finds that there is no potential conflict of interest under State or local law that would prevent City Employee from receiving Program funds because City Employee does not perform any work for HCDD's administration of the Program, including "exercising any functions or responsibilities with respect to administering the [Program] including determining eligibility to participate in the [Program]; or participating in a decision-making process with regard to the [Program]."

After review of the remaining relevant State and Local Laws, the OCA also did not find any other provisions that would explicitly prohibit the Funding Recipient from benefiting from a CDBG-assisted activity. Furthermore, the OCA is not aware of any facts that would indicate that the City Employee has violated State and Local Laws. Based on the foregoing, the OCA opines that there is no potential conflict of interest in this matter pursuant to the relevant State and Local Laws because Gaddis' job duties do not involve "exercising any functions or responsibilities with respect to administering the [Program] including determining eligibility to participate in the [Program]; or participating in a decision-making process with regard to the [Program]."

Accordingly, the City requests that an exception be granted.