

**MAYOR**  
Caroline Simmons



**CITY OF STAMFORD**

**BOARD OF ETHICS**

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June 21, 2023

Ms. Frances Lane  
C/o Stamford Affordable Housing Trust Fund Board of Trustees  
888 Washington Boulevard, 7<sup>th</sup> Floor  
Stamford, CT 06901

Dear Ms. Frances Lane,

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 Affordable Housing Trust Fund Board of Trustees (the “Trust Fund Board”), a board created by the Stamford Board of Representatives for the purpose of supporting the preservation of existing and the creation of new affordable rental and home ownership housing in Stamford. You asked the Board for an opinion regarding your role on the Trust Fund Board as it relates to an upcoming vote on whether to distribute funds from the trust to Charter Oak Communities (“Charter Oak”), part of the Stamford Housing Authority. The funds are being sought for the renovation of Oak Park, a Charter Oak property. You do not reside at Oak Park, but you reside at another Charter Oak property and want to know whether, as a result of this, your participation in the upcoming vote would present a conflict of interest.

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.” 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, you have no economic interest that will benefit from the funding at issue. You do not reside at Oak Park, you do not know anyone who resides there, and you have no interest relating to the renovation of the building whatsoever. While you do reside at another Charter Oak property, you rent your dwelling and the amount of rent that you pay will not be impacted by any funds distributed by the Trust Fund Board to Charter Oak for the Oak Park project. Therefore, we find no conflict of interest that prohibits you from voting on this funding matter under Section 19-4 of the Code.

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." Again, the funds requested are for the renovation of a building in which you do not reside and have no interest. Based on the facts presented, voting on the distribution of funds to Charter Oak for the Oak Park project would not constitute use of your position as a member of the Trust Fund Board or an official action that would violate Section 19-5 of the Code.

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.

Thank you for proactively seeking advice on compliance with the Code of Ethics, and for your service to the City of Stamford.

Sincerely,

A handwritten signature in cursive script that reads "Allan Lang".

Allan D. Lang, Chair  
Board of Ethics

Cc: City & Town Clerk's Office