

BOARD OF ETHICS
City of Stamford
888 Washington Boulevard
Stamford, Connecticut 06904

October 22, 1997

Mr. Robert P. DeLuca
President
DeLuca Industrial Supplies, Inc.
P.O. Box 2459
Stamford, CT 06906

Dear Mr. DeLuca:

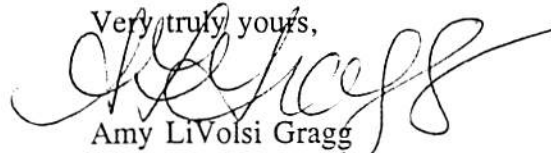
You have requested the Board of Ethics issue an Advisory Opinion as to whether, in light of your position on the Board of Directors of the Golf Authority, a conflict of interest exists when your Company, DeLuca Industrial Supplies, Inc., sells merchandise to Sterling Farms Golf Course.

Provided you and DeLuca Industrial Supplies, Inc. adhere to any standards the Golf Authority presently has in place with regard to purchasing of supplies, materials, equipment, etc., the Board of Ethics is of the opinion that your current practice does not violate the Code of Ethics of the City of Stamford. Further, the Board is aware that in December of this year the lease for Sterling Farms Golf Course will be coming up for renewal. It is the belief of the Board that one of the terms of this Lease is that the Golf Authority/Sterling Farms must abide by the rules and regulations for purchasing of supplies, etc. which currently are in place for governmental authorities of the City of Stamford. Once this lease is executed, the Board of Ethics is of the opinion that your practice is not prohibited by the Code of Ethics, provided you adhere to the aforementioned regulations of the City of Stamford, and in your capacity on the Board of Directors, you abstain from any discussion, voting or related matters with regard to the purchasing of supplies, materials, equipment, etc.

This opinion is binding upon the Board of Ethics and yourself unless amended or revoked, and reliance on this opinion in good faith is an absolute defense in any action or proceeding brought under the provision of the Code of Ethics.

The Board thanks you for taking the time and effort to request an Advisory Opinion.

Very truly yours,



Amy LiVolsi Gragg
Chairman of Board of Ethics

cc: Lois Pont-Briant ✓
All Members of the Board of Ethics