

George E. Pataki
Governor



Judith A. Calogero
Commissioner

New York State Division of Housing and Community Renewal

25 Beaver Street
New York, NY 10004

HOUSING MANAGEMENT BUREAU MEMORANDUM #2005-B-04

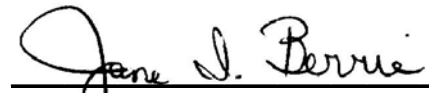
TO: All Housing Companies
Owners, Managing Agents and Site Managers

FROM: Jane I. Berrie, Director
Housing Management Bureau

DATE: January 26, 2005

SUBJECT: Campaign Contributions

It is inappropriate for present or prospective managing agents and contractors, their employees, or persons having a direct or indirect interest in such companies to make campaign contributions or pay campaign expenses of persons running for the Board of Directors of a housing company. Directors of a corporation act in a fiduciary capacity with respect to the corporation, and are required to place the corporation's interest above their personal interests. Accepting campaign contributions from parties who contract with the corporation creates at least an appearance of a conflict of interest and, in most circumstances, an actual conflict as well. Managers and managing agents should take steps to ensure that candidates for the Board are advised of the subject of this memo. In addition, language should be added to contract documents, purchase orders, and other similar documents advising contractors that they may not make such contributions or payments.



Jane I. Berrie