

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

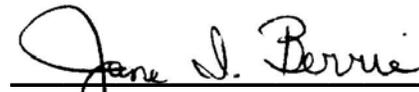
**FROM:** Jane I. Berrie, Director  
Housing Management Bureau

**DATE:** January 26, 2005

**SUBJECT:** Campaign Contributions

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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.

  
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Jane I. Berrie