



New England

**U.S. Department of Housing and Urban Development**

Community Planning and Development Division  
Hartford Field Office, HUD Region I  
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Hartford, Connecticut 06103-3220  
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March 5, 2026

Grace Richards, Administrative Staff Attorney  
Town Attorney's Office  
Town of Manchester  
41 Center Street P.O. Box 191  
Manchester, CT 06045-0191

SUBJECT: Potential Conflict of Interest Disclosure

Dear Ms. Richards:

The U.S. Department of Housing and Urban Development (HUD), Region I, Hartford Field Office of Community Planning and Development (CPD) has reviewed the scenario posed in your March 4, 2026 letter. We have concluded that this would constitute a Conflict of Interest under the Community Development Block Grant (CDBG) regulations at 24 CFR § 570.611. The City may proceed with an Exception request as outlined within that part.

HUD applies the Conflict-of-Interest requirements broadly to avoid even the appearance of impropriety. Mr. Adam DeLaura's position within Manchester's Planning and Economic Development Department qualifies him as a "covered person." Although he does not have decision-making authority, Mr. DeLaura may still have access to inside information regarding the CDBG program. As an officer of Interval House, Ms. Amanda DeLaura, despite not being directly involved in the funded projects, would nonetheless have an interest in and would benefit from the City's investment in the organization.

We emphasize that this determination does not imply any wrongdoing. However, in keeping with our prior interpretations of conflict-of-interest provisions, we must remain consistent in our application of the CDBG regulations. The exception process under these regulations involves a relatively low administrative threshold, and once the required documentation is submitted, HUD will ensure an expedited review.

If there are any questions or there is a request for technical assistance, please do not hesitate to contact Ms. Brenda Turner, Community Planning and Development Representative, at (860)240-9733 or [Brenda.G.Turner@hud.gov](mailto:Brenda.G.Turner@hud.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "P. McKeough".

Phillip McKeough  
CPD Director