



STEVE STEPHANOU, TOWN MANAGER

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SARAH JONES, DEPUTY MAYOR  
PAMELA FLOYD-CRANFORD, SECRETARY

# Town of Manchester

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March 4, 2026

Hartford Field Office  
U.S. Department of Housing and Urban Development  
20 Church Street, 10th Floor  
Hartford, CT 06103

Re: Potential Conflict of Interest Disclosure

To Whom It May Concern:

The Town of Manchester writes to disclose a potential conflict of interest per the *General Administrative, National, and Departmental Policy Requirements and Terms for HUD's Financial Assistance Programs* (revised Apr. 22, 2025).

The Town of Manchester intends to sign a Subrecipient Agreement with Interval House, a tax-exempt 501(C)(3) nonprofit organization, to fund staff that provide support services to survivors of domestic violence. The Director of Advancement at Interval House is Amanda DeLaura. Her work does not currently involve administering a grant through the Community Development Block Grant Program (CDBG grant) as a Subrecipient. However, in her prior role as the Director of Development at Interval House, she submitted documents required for the CDBG grant application process. Her last direct correspondence related to the CDBG grant was in 2021.

In April 2025, Adam DeLaura was hired by the Town of Manchester as Economic Development Specialist in the Planning & Economic Development Department. Adam is married to Amanda DeLaura. The Planning & Economic Development Department is responsible for management of the Town's CDBG funds; however, Adam is not and has never been involved with the Town's CDBG grant.

The Town's Community Development Program Manager sought the advice of the Town Attorney's Office regarding this potential conflict of interest. Under the circumstances, the Town Attorney's Office does not find a conflict nor a violation of HUD's standard prohibition on conflicts. Adam DeLaura does not participate in decision making regarding the CDBG grant and is uninvolved in the Town's CDBG grant process. Amanda DeLaura is no longer involved in the CDBG process at Interval House. In any event, neither Adam nor Amanda obtains a financial interest or benefit from funding staff to support survivors of domestic violence at Interval House, which is a nonprofit organization.

While the Town of Manchester does not find a conflict of interest and is therefore not requesting an exception at this time, it understands its obligation to report *potential* conflicts of interest to

HUD. If HUD concludes otherwise, the Town will submit a written request for exception, accompanied by an opinion from the Town Attorney's Office and public notice.

If you have any questions or need additional information, please contact me at [grichards@manchesterct.gov](mailto:grichards@manchesterct.gov) or Heather Guerette, Community Development Program Manager for the Town of Manchester, at [hguerette@manchesterct.gov](mailto:hguerette@manchesterct.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Grace Richards". The signature is fluid and cursive, with the first name "Grace" being more prominent than the last name "Richards".

Grace Richards  
Administrative Staff Attorney  
Town Attorney's Office  
Town of Manchester