

**ETHICS COMMISSION  
CITY AND COUNTY OF HONOLULU**



**Advisory Opinion No. 62**

This advisory opinion is issued based on the disclosure submitted by Employee X of your department wherein he is part owner of an apartment building and a rent subsidy, has been authorized by your department for one of his tenants.

Our initial investigation revealed the following findings:

1. Employee X is a lead building maintenance repairman for your department.
2. His primary duty or responsibility is to maintain buildings which have been acquired by your department for relocation of displacees from public projects.
3. Along with his mother and brother, he is an owner of an apartment building.
4. In that apartment building there is a tenant who has been found eligible by your department for rent subsidy.
5. Such rent subsidy is of direct benefit to Employee X as part owner of the apartment building, but the basis of such rent subsidy is determined by the financial situation of the tenant rather than Employee X's employment with the City.

The foregoing findings show that Employee X is required to maintain buildings which have been purchased by your department for relocation of displacees from public projects and does not involve the apartment building of which he is part owner. Although Employee X is benefited by the rent subsidy, such subsidy is based on the financial situation of his tenant rather than his employment with the City. Under such circumstances, we are of the opinion that there is no conflict of interest between Employee X's public duties as a lead maintenance repairman as against his private interest as part owner of an apartment building wherein a tenant is a recipient of rent subsidy from your department.

Dated: Honolulu, Hawai'i, September 29, 1976.

ETHICS COMMISSION  
Nathaniel Felzer, Chairman