



TORIBIO "TERRY" PALACIOS
CRIMINAL DISTRICT ATTORNEY

May 22, 2025

Dr. Joel Rivera, Ph.D.
Director
Hidalgo County Urban County Program
1916 Tesoro Blvd.
Pharr, Texas 78577

RE: Request for Opinion from the Hidalgo County District Attorney's Office regarding services provided by the Urban County Program (UCP), and whether said service would violate State or Local law.

Honorable Dr. Rivera,

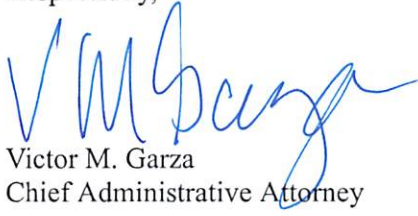
Please be advised that this opinion is being provided pursuant to the conflict-of-interest provisions of 24 C.F.R. § 92.356(d)(2), as to the Department of Housing and Urban Development (HUD) Home Investment Partnership Program. Additionally, the opinion is provided for the purpose of the UCP Owner-Occupied Rehabilitation Program's request from HUD and exception to section (b) of the 24 C.F.R. § 92.356 for applicant Norma L. Acevedo, cousin of the mother of Hidalgo County Commissioner Pct. 4 Ellie Torres.

Our office reviewed applicable conflict of interest provisions and/or nepotism provisions the Texas Local Government Code and Texas Government Code, Home Program conflict of interest policy, Owner-Occupied Rehabilitation Program policy, conflict of interest Affidavits submitted by the Applicant and the Official, pertinent County of Hidalgo policy and procedures, as well as other information, documents or instruments deemed necessary and advisable to review for the purposes of this request for opinion.

To the extent that the request for opinion is a requisite of the UCP seeking an applicable exception to section (b) of the 24 C.F.R. § 92.356, the opinion of this office is that the interest for which an exception is sought, the application of Ms. Acevedo, cousin of the mother of Commissioner Torres to the UCP's Owner-Occupied Rehabilitation Program would not violate State or Local law.

It is advised that, and this opinion is subject to, the UCP proceeding accordingly, and ensure any and all requisites to said request for exception from HUD are complied with; that approval of the application is subject to receipt of an exception; and conformity with any other applicable State or local law requirements.

Respectfully,

A handwritten signature in blue ink, appearing to read "VM Garza". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Victor M. Garza
Chief Administrative Attorney