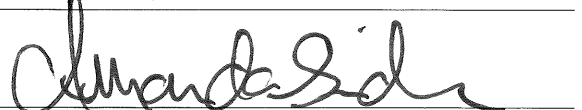


**MEMORANDUM
FROM THE
OFFICE OF COUNTY ATTORNEY**

DATE: March 28, 2019

To: Jeannie Sutton
Human Services

FROM:


Amanda L. Swindle
Assistant County Attorney

RE: HUD Urban County Cooperation Agreements for 2020-2022

Per your request in the Memorandum dated March 22, 2019, and in accordance with the requirements of HUD, I have reviewed the proposed Urban County Cooperation Agreements and supporting documents and am providing you with the following legal opinion.

There are three (3) Urban County Cooperation Agreements, one each between the County and City of Bonita Springs, City of Sanibel and Town of Fort Myers Beach. These agreements were originally executed in 2004, and have been renewed several times, most recently in 2016, for successive three-year terms. Additionally, there is one new Urban County Cooperation Agreement with the Village of Estero. HUD requires such cooperation agreements for communities participating in the Community Development Block Grant program.

These cooperation agreements contain automatic three-year renewal terms unless either the County or a participating municipality provides written notice of an election not to participate in the new qualification period. Each of these municipalities has been notified that they must decide whether they do not wish to continue to participate under the program no later than May 17, 2019, or the agreements will automatically renew per their terms.

I have reviewed the format of the original and proposed Agreements; the draft Joint Resolutions between the County and the City of Bonita Springs, City of Sanibel, Town of Fort Myers Beach, and the Village of Estero; the notification of renewal sent to the municipalities; and the Notice from HUD, and find these documents to be acceptable under Florida and federal law. It is my opinion that the Agreements continue to provide full legal authority for the County to participate in the HUD program.

Please let me know if you have any questions concerning this memorandum or related matters.