

**DISCLOSURE BY NON-ELECTED STATE EMPLOYEE OF FINANCIAL INTEREST
AND DETERMINATION BY APPOINTING AUTHORITY
AS REQUIRED BY G. L. c. 268A, § 6**

RECEIVED
STATE ETHICS COMMISSION

	STATE EMPLOYEE INFORMATION	2025 MAY 28 AM 10:27
Name:	Benjamin Bryant	
Title or Position:	Director of Policy Implementation	
State Agency:	Executive Office of Housing and Livable Communities	
Agency Address:	100 Cambridge St, #300 Boston, MA 02114	
Office Phone:	617-573-1101	
Office E-mail:	Benjamin.Bryant@mass.gov	
	My duties require me to participate in a particular matter, and I may not participate because of a financial interest that I am disclosing here. I request a determination from my appointing authority about how I should proceed.	
	PARTICULAR MATTER	
Particular matter E.g., a judicial or other proceeding, application, submission, request for a ruling or other determination, contract, claim, controversy, charge, accusation, arrest, decision, determination, or finding.	The drafting of an Executive Order (currently in draft form) that would establish an Interagency Modular Housing Task Force (comprised of state employees) and an external Advisory Council and charge the groups with recommending to the Administration regulatory and process reforms that would support modular housing development and manufacturing in Massachusetts.	
Your required participation in the particular matter: E.g., approval, disapproval, decision, recommendation, rendering advice, investigation, other.	I am leading the drafting of an Executive Order (to be filed by the Governor) that would create an Interagency Task Force and external Advisory Council and charge the groups with recommending to the Administration regulatory reforms and process improvements that would support modular housing and manufacturing in Massachusetts. As part of this work, I've helped develop a proposed structure, scope of work, and set of deliverables for the Task Force and Council. I've also helped shepherd a draft version of the Executive Order through various levels of review. I anticipate that I will be required to continue to support the refinement of the EO language and possibly help present the content to the Governor's Office over the coming weeks.	
	FINANCIAL INTEREST IN THE PARTICULAR MATTER	
Write an X by all that apply.	<input checked="" type="checkbox"/> I have a financial interest in the matter. <input type="checkbox"/> My immediate family member has a financial interest in the matter. <input type="checkbox"/> My business partner has a financial interest in the matter. <input type="checkbox"/> I am an officer, director, trustee, partner or employee of a business organization, and the business organization has a financial interest in the matter. <input type="checkbox"/> I am negotiating or have made an arrangement concerning future employment with a person or organization, and the person or organization has a financial interest in the matter.	
Financial interest in the matter	<p>I am planning on leaving HLC in the Summer to pursue a JD/MBA at Harvard University, and I have begun to consider career options for after my graduate studies. As I've done more reflection on what my future career paths could look like, I've determined that it is reasonably foreseeable that I would want to pursue a career in and/or around the modular housing industry.</p> <p>In the long-term, I could see myself wanting to provide legal advice to modular developers seeking</p>	

	<p>to navigate Massachusetts' regulatory environment, working in strategy or operations for or at a modular housing developer or manufacturer, or supporting the modular housing industry, broadly, from the financing side or through an entrepreneurial pursuit. In the short-term, I could see myself wanting to make the case that, once I leave HLC, I should be appointed to the Modular Housing Advisory Council to continue to support the Commonwealth's engagement on the topic and further my own understanding of the challenges associated with modular manufacturing and development.</p> <p>In either case, I've realized that I have a financial interest in the ongoing work I'm supporting to establish a Modular Housing Task Force and Advisory Council via Executive Order. Because the Task Force and Council will be exploring changes that would be foundational to MA's modular housing regulatory landscape, which I may want to work on in the private sector, and because my potentially serving on the Advisory Council could result in relationship building that could have an impact on my career opportunities, I'm requesting a determination from my appointing authority on how I should proceed. (I have temporarily paused further work on the draft executive order as I await direction from my appointing authority.)</p>
Employee signature:	<i>Bryan Fels Bant</i>
Date:	5/21/25

DETERMINATION BY APPOINTING OFFICIAL

	APPOINTING AUTHORITY INFORMATION
Name of Appointing Authority:	Ed Augustus
Title or Position:	Secretary
Agency/Department:	Executive Office of Housing and Livable Communities
Agency Address:	100 Cambridge St, #300 Boston, MA 02114
Office Phone:	617-573-1101
Office E-mail:	Ed.Augustus@mass.gov
	DETERMINATION
<p>Determination by appointing authority:</p> <p>Write an X by your selection.</p>	<p>As appointing official, as required by G.L. c. 268A, § 6, I have reviewed the particular matter and the financial interest identified above by a state employee.</p> <p><input type="checkbox"/> I am assigning the particular matter to another employee, or</p> <p><input type="checkbox"/> I am assuming responsibility for the particular matter, or</p> <p><input checked="" type="checkbox"/> I have determined that the financial interest is not so substantial as to be deemed likely to affect the integrity of the services which the Commonwealth may expect from the employee.</p>
Appointing Authority signature:	<i>Ed Augustus</i>
Date:	5/27/25
Comment:	

Attach additional pages if necessary.

File copy with:
State Ethics Commission, One Ashburton Place, Room 619, Boston, MA 02108