

1                   BEFORE THE BOARD OF COUNTY COMMISSIONERS  
2                   FOR MULTNOMAH COUNTY, OREGON  
3                   ORDINANCE NO. 895  
4

5           An Ordinance amending Ordinance No. 795 to provide for procedures for  
6 conveyance of tax foreclosed property to nonprofit and municipal corporations for the  
7 creation of open space, parks or natural areas for perpetual public use.

8           Multnomah County ordains as follows:

9   SECTION I - FINDINGS

10          (A) ORS 271.330 has been amended to permit the County to convey properties,  
11             including tax foreclosed properties, to nonprofit and municipal corporations for  
12             the creation of open space, parks or natural areas for perpetual public use,

13          (B) This Board has previously recognized in Ordinance 795 that some tax  
14             foreclosed properties may have present and future value in their natural state  
15             and should be conveyed to agencies who can maintain or enhance their value  
16             for wildlife habitat, parks, open spaces or other environmental purposes.

17          (C) It is to the benefit of the citizens of Multnomah County for the County to  
18             entrust municipal corporations and recognized nonprofit organizations with preserving  
19             open space, parks, and natural areas within the County.

20          (D) It is necessary to establish procedures for evaluation, selection and conveyance  
21             of tax foreclosed properties to municipal and nonprofit corporations for these  
22             purposes.

23   SECTION II: - REVISIONS TO ORDINANCE 795

24          Ordinance 795 is amended as follows. New material is in bold, deleted material is  
25             in italics and brackets.

26   SECTION ~~II~~ I - DEFINITIONS

27          For the purposes of this ordinance, unless the context requires otherwise, the  
28             following  
29             terms are defined as follows:

30          (A) "Board" means Board of County Commissioners of Multnomah County,  
31             Oregon.

- 1 (B) "Department" means Multnomah County Department of Environmental  
2 Services.
- 3 (C) "Director" means the Director of the Multnomah County Department of  
4 Environmental Services."
- 5 (D) "Greenspace Committee" means the Greenspace Review Committee.
- 6 (E) "Property" means all property acquired by Multnomah County by foreclosure  
7 of delinquent tax liens.
- 8 (F) "Nonprofit housing sponsor" means any government or nonprofit  
9 corporation organized under the provisions of ORS Chapter {61}65 for the  
10 purpose of undertaking, constructing, or operating a housing project to assist  
11 low and lower income families, or authorized by its charter to undertake,  
12 construct, or operate such housing projects.
- 13 (G) "Owner" or "former owner" means a property owner or contract purchaser  
14 of record at the time a judicial decree of foreclosure was entered as to the  
15 affected property.
- 16 (H) "Repurchase agreement" means a contract to sell tax foreclosed property to  
17 the former owner prior to foreclosure.
- 18 (I) "Social services agency" means an appropriate social service provider, as  
19 designated by the Board of County Commissioners.
- 20 (J) "Tax title fund" means the Multnomah County accounting fund maintained to  
21 receive proceeds from the sale of tax foreclosed properties and disburse all  
22 lawful expenditures therefrom.
- 23 (K) "Days" means calendar days unless otherwise noted.
- 24 (L) **"Open space" means developed parks with active recreational facilities**  
25 **such as ball fields, tennis courts, playgrounds, community gardens, golf**  
26 **courses, cemeteries, or vacant lands with the potential for becoming a**  
27 **park or natural area.**
- 28 (M) **"Parks" means publicly or privately owned land designed or utilized for**  
29 **outdoor recreation and devoid of man-made structures for habitation.**
- 30 (N) **"Natural area" means a landscape unit composed of plant and animal**  
31 **communities, water bodies, soil, and rock; largely devoid of human**

1           made structures; maintained and manage in such a way as to promote  
2           or enhance population of wildlife.

3           (O) "Open Space Preservation Sponsor" means any government or  
4           nonprofit corporation organized under the provisions of ORS Chapter  
5           65 for the purpose of preserving and actively managing properties as  
6           open spaces, parks or natural areas.

7           (P) "Community Gardens" means public or private land divided into plots  
8           for growing vegetables, fruits, flowers, native, or ornamental plants. A  
9           community garden may also mean private or public land used for  
10          growing or displaying an orchard of small trees, herbs, or dry land  
11          plants.

12       **SECTION [III] II.- PROPERTY ADMINISTRATION AND EVALUATION**

13          (A) The Department shall be responsible for management of the tax title fund  
14          and for the inventory, management, maintenance and disposition of all tax  
15          foreclosed properties in accordance with state statutes and this ordinance.

16          (B) The Department, in order to assure the fiscal stability of the tax title fund,  
17          may identify properties to be sold at public auction and not available for  
18          donation to governments or non-profit housing sponsors, **or Open Space**  
19          **Preservation Sponsors.**

20          (C) The Department shall be responsible for a physical inspection of all  
21          properties upon conveyance to the County.

22          (D) If any property is occupied, the Department shall notify an appropriate  
23          County social services agency if the occupants may require exceptional  
24          assistance. The agency shall make an assessment of the circumstances within  
25          thirty (30) days of such notification and submit a report to the Department.  
26          Upon receipt of a report from a social services agency recommending  
27          special assistance, the Department shall suspend efforts to dispose of the  
28          property pending further direction from the Board and shall forward a copy  
29          of the report to the Board. The Board shall review the case and order  
30          appropriate action within thirty (30) days.



1 (E) In the event any request for transfer of property by a governmental entity  
2 conflicts with any other request for transfer of property in accordance with  
3 this ordinance, the Department shall put the matter on the Board's regular  
4 meeting agenda for resolution by the Board.

5 SECTION [IV] III - REPURCHASE QUALIFICATIONS AND CONTRACT  
6 REQUIREMENTS

7 (A) Repurchase Period. Upon receipt of recorded property deeds, the  
8 Department shall send notices by certified mail to former owners of tax  
9 foreclosed properties. The notices shall advise the recipients:

10 (1) Within thirty (30) days from the date of the notice the owner may:

11 (a) Pay in cash the repurchase price established by the Department  
12 under Section [IV] III(C) of this ordinance, or

13 (b) Complete an application to repurchase the property by  
14 repurchase contract.

15 (2) If the owner fails to either repurchase in cash or to qualify to repurchase  
16 by property contract within the time provided, the Department may  
17 dispose of the property as provided in this ordinance.

18 (B) Repurchase Contract Qualifications. Former owners may repurchase  
19 property on contract if the property and the owner meet the following  
20 qualifications:

21 (1) The property must be:

22 (a) The primary residence of the former owner; or

23 (b) The primary location of the former owner's business; or

24 (c) Used as an integral part of a residential treatment or social  
25 services program sponsored by the owner, if the owner is a nonprofit  
26 organization exempt from federal taxes under IRC 501 (C)(3); and

27 (2) Any other real property of the owner in Multnomah County has not  
28 been foreclosed for non-payment of taxes in the previous ten (10) years,  
29 unless such prior foreclosure is either (1) the owner's primary residence if  
30 the current foreclosure is the owner's primary business, or (2) the owner's

1 primary business if the current foreclosure is the owner's primary  
2 residence; and

3 (3) The owner has not previously repurchased property by an  
4 agreement which has been canceled by the County within the preceding ten  
5 (10) years; and

6 (4) The owner must demonstrate financial ability to meet minimum  
7 payment requirements of a contract; and

8 (5) Improved property must be suitable for occupation, or the owner  
9 must demonstrate an ability to make the property suitable for occupation  
10 within the period specified by the County.

11 (C) Repurchase Contract Price

12 (1) The repurchase price shall be the sum of: all the uncollected taxes as of  
13 the date the property was conveyed to the County; an amount equal to  
14 taxes which would have accrued after conveyance to the County,  
15 including accrued interest and interest which would have accrued after  
16 conveyance to the County; penalties; municipal liens; delinquent sewer  
17 liens; special assessments; costs of maintenance or nuisance abatement,  
18 and administrative expenses which shall include, but not be limited to,  
19 title searches, expense of document preparation and recording fees.

20 (2) Repurchase contracts shall include provisions for prepayment of real  
21 property taxes with any debt service installment payments.

22 (D) Appeal Process For Contract Denials

23 (1) The Department may deny any application for repurchase by contract if  
24 the applicant fails to submit sufficient evidence to show compliance  
25 with contract qualifications in Section {IV}III(B).

26 (2) The Director shall give notice of denial in writing to the applicant by  
27 regular mail. The notice of denial shall include:

28 (a) A statement of the reason(s) for the denial.

29 (b) Explanation of how the decision of the Director may be  
30 appealed to the Board; and

1 (c) Explanation of the actions necessary to request an  
2 administrative exception.

3 (3) Requests for an administrative exception must be submitted to the  
4 Director within fifteen (15) days after the notification of denial was  
5 mailed. The Director will make a determination within fifteen (15) days  
6 after the request. The Director may grant an administrative exception  
7 to the qualification requirements if in the public interest.

8 (4) Within fifteen (15) days after a notice of the Director's denial, the  
9 applicant may either repurchase the property for cash or appeal the  
10 denial to the Board. The appeal shall be filed with the Department and  
11 shall recite the facts forming the basis for the appeal and set out the  
12 reasons the applicant believes the Board should reverse the Director's  
13 decision. The Department shall promptly deliver a copy of the request  
14 for appeal together with a copy of the Director's reasons for denial  
15 prior to the appeal hearing.

16 (5) When an appeal is filed, at the next regular Board meeting at which  
17 the matter can be presented, the Board shall schedule a hearing to hear  
18 the appeal.

19 (6) The Board will determine the disposition of the appeal based on the  
20 following:

21 (a) Whether the applicant meets the contract qualifications and  
22 requirements stated in Section [IV] III(B);

23 (b) Whether the applicant filed a completed repurchase  
24 application within the time required by Section [IV] III(A)(1)  
25 of this ordinance;

26 (c) Whether the applicant filed an appeal in the manner required  
27 by Section [IV] III(D)(3)(4) of this ordinance;

28 (d) Whether other extenuating circumstances exist.

29 (E) Appeal Process for Contract Cancellation



- (1) If at any time a contract is in default and subject to cancellation, the Director may give notice of default in accordance with the repurchase contract.
- (2) Any contract purchaser may request the Director to grant relief from cancellation by request in writing to the Director within fifteen (15) days after notification of default. The Director will make a determination within fifteen (15) days thereafter whether to modify the contract, grant other appropriate relief or to specify a date the contract will be canceled.
- (3) If the Director denies a request for relief from contract cancellation, the Department shall give the purchaser notice of the reasons therefore in writing by regular mail. The notice shall include information on how the contract may be appealed to the Board of County Commissioners.
- (4) Within fifteen (15) days after the Director's denial, the repurchaser may either pay off the balance of the contract in cash, or appeal the proposed contract cancellation to the Board. The appeal shall be in writing, recite the facts forming the basis for appeal and reflect the reasons the petitioner believes the Board should reverse the Director's decision.
- (5) When an appeal is filed, at the next regular Board meeting at which the matter can be presented, the Board shall schedule a hearing to hear the appeal.
- (6) The Department shall provide the Board a copy of the Director's notice of denial prior to the appeal hearing. At the appeal hearing, the Board may affirm the Director's decision to cancel the contract or fashion other appropriate relief, including reinstatement or modification of the contract.

SECTION [V] IV - PROCEDURE FOR IDENTIFYING PROPERTIES TO BE DESIGNATED AS HAVING GREENSPACE ENVIRONMENTAL VALUE

1 (A) A Greenspace Review Committee is hereby established to review tax  
2 foreclosed properties to determine suitability of properties for public use as  
3 open space, parks, or natural areas and provide such information to  
4 governmental jurisdictions and other interested groups. The committee shall  
5 consist of not less than five members to serve at the pleasure of the Board.

6 (B) When the annual comprehensive County deed is recorded for tax foreclosed  
7 properties after the expiration of the redemption period, the Department shall  
8 provide a list of the properties to the Greenspace Committee. *{The committee*  
9 *shall evaluate the properties, using criteria approved by the Board, to*  
10 *determine suitability for park, open space, or natural area purposes.}* **The**  
11 **Greenspaces Review Committee shall utilize the following factors in a**  
12 **“Greenspaces Screen” to evaluate properties for their greenspace value:**

13 a) **The Greenspaces Inventory established by Metro**

14 b) **The Significant Environmental Concerns Zone established by**  
15 **Multnomah County**

16 c) **An environmental protections zone established by a city**

17 d) **An environmental conservation zone established by a city**

18 e) **Park Deficiency Area Standards (until new criteria can be**  
19 **developed and unless otherwise directed by a local jurisdiction the**  
20 **“National Park and Recreational Association” standards will be**  
21 **used)**

22 f) **The Combined Sewer Overflow area as determined by the City of**  
23 **Portland.**

24 **Within 90 days after receipt of the list, the committee shall furnish the**  
25 **Department with a list of properties deemed suitable for parks, open**  
26 **spaces or natural areas and shall identify the significant environmental**  
27 **qualities and a proposed public purpose for each property on the list.**  
28 *{Within 90 days thereafter, the committee shall furnish the Department with*  
29 *a list of properties deemed suitable for the specified purposes, the significant*  
30 *environmental qualities and make recommendations regarding the public*  
31 *purpose for each property on the list.}*



1 (C)The Greenspace Committee's recommendations shall be noted in any  
2 notification to governmental entities of properties available for public use  
3 transfers under Section *[VII]* VI of this ordinance.

4 (D)The Greenspace Committee may make recommendations to the Board at any  
5 time regarding properties recommended for public use for park, open space or  
6 natural area uses if any such property is not transferred for a public purpose  
7 under any provision of this ordinance.

8 SECTION *[VI]* V - REQUESTING TRANSFER OF TAX FORECLOSED PROPERTY  
9 TO GOVERNMENTS FOR NON HOUSING PURPOSES

10 (A) As soon as practicable after the properties on the annual comprehensive  
11 County Deed have been conveyed to the County, the Department shall mail a  
12 list of property available to government units and officially recognized  
13 neighborhood associations in Multnomah County with a notice that the  
14 properties are eligible for transfer, for non-housing purposes only.

15 (B) Properties having characteristics identified under Section *[V]* IV of this  
16 ordinance shall be so identified on the property list.

17 (C) A governmental unit may request transfer of listed property within sixty (60)  
18 days after notice of property availability was first mailed. All requests shall be  
19 on forms provided by the Department and must be authorized by the requesting  
20 governing body.

21 (D) The Department shall report to the Board all requests for transfer of property  
22 by governments. The report shall identify the governmental entity requesting  
23 transfer, a description of the property, the amount of, taxes owed when the  
24 property was conveyed to the County, all maintenance costs incurred by the  
25 County, and the applicant's proposed public use.

26 (E) The Board shall schedule a public hearing as soon as practically convenient.  
27 The Department shall publish notice of the scheduled public hearing in a  
28 newspaper of general circulation in the County for two successive weeks. The  
29 notice shall describe the property, state that the Board will accept comments  
30 concerning the transfer at the hearing and where a copy of the Department's

1 report can be obtained. A copy of the notice shall be mailed to applicants and  
2 other persons requesting such notice.

3 (F) At the conclusion of the hearing, the Board may approve the transfers if the  
4 Board determines the transfers will serve the public interest. The Board shall  
5 also determine whether such transfers are for monetary consideration or no  
6 consideration.

7 (G) Conveyances of property transferred to governmental entities for a public  
8 purpose without consideration, other than housing, shall provide that should  
9 the property cease to be used for a public purpose, the title shall revert to the  
10 County. This restriction shall not apply to transfers to a governmental body in  
11 exchange for payment of the amount of taxes and costs for which the property  
12 is liable.

13 (H) For those properties approved by the Board for transfer to governmental  
14 entities, transfer of title shall occur within sixty (60) days, or as soon after as  
15 practicable. Refusal of the receiving entity to accept title shall void approval  
16 of such transfer and shall result in the property being disposed of as provided  
17 by law.

18 (I) Property maintenance by Multnomah County shall cease upon transfer of the  
19 title to the receiving agency.

20 SECTION [VII] VI - PROCEDURE FOR REQUESTING TRANSFER OF TAX  
21 FORECLOSED PROPERTY FOR HOUSING PURPOSES

22 (A) An Affordable Housing Review Committee has been established to make  
23 recommendations to the Board regarding all disposition of tax foreclosed  
24 property for affordable housing under the procedures of Affordable Housing  
25 Development Program (AHDP). The Affordable Housing Review Committee  
26 members shall be appointed by the Chair and approved by the Board. The  
27 committee shall be composed of representatives from: the City of Gresham, the  
28 City of Portland, the Community Development Block Grant Urban County  
29 Policy Advisory Board, a philanthropic organization, the banking industry, the  
30 Citizen Involvement Committee and the Board.



1 (B) Requests for properties for low-income housing will be considered according  
2 to procedures established by Multnomah County AHDP and approved by the  
3 Board.

4 (C) A list of properties remaining after transfer requests of governmental units,  
5 shall be submitted to AHDP.

6 (D) AHDP shall, within thirty (30) days after receipt of the list of available  
7 properties, advise the Department which properties will be processed for low  
8 income housing development. Within ten (10) days thereafter, AHDP shall  
9 mail the list of available properties to governments and other nonprofit housing  
10 sponsors in Multnomah County.

11 (E) Written applications by housing sponsors shall be filed with AHDP within  
12 forty-five (45) days after notice of property availability was first mailed. All  
13 requests shall be on forms provided by AHDP.

14 (F) Within sixty (60) days after receipt of applications for property under AHDP,  
15 the Affordable Housing Review Committee will prepare disposition  
16 recommendations to the Board. recommendations shall be based on the  
17 sponsoring organization's stability and viability, the project plan, financial plan  
18 and community support.

19 (G) Within seven (7) days after AHDP determines any property will not be  
20 transferred to a non-profit housing sponsor, because no applications for the  
21 property were received or approved, AHDP shall provide the Department with  
22 a list of properties not required for housing development. **If [S]/such properties**  
23 **were also not selected by the Greenspace Review Committee, they** may be  
24 added to the inventory of tax foreclosed properties available for disposition  
25 according to law.

26 (H) *[Not less than fifteen (15) days after receiving the recommendations from*  
27 *AHDP, the Board shall schedule a public hearing to receive public comments*  
28 *concerning the proposed property transfers.*

29 (I) *The Department shall publish notice of the scheduled hearing in a newspaper*  
30 *of general circulation in the County for two successive weeks. The notice shall*  
31 *state the description or location of the properties and that the Board will hear*



1           *comments concerning the transfer at the hearing. A copy of the notice shall*  
2           *be mailed to the applicants and applicable neighborhood associations and to*  
3           *other persons requesting such notice.*

4           (J) *Approval of transfers shall be based upon the degree proposals for transfer*  
5           *are feasible and in the public interest. Transfers may be for consideration or*  
6           *for no consideration. Transfers in connection with the County Affordable*  
7           *Housing Development Program shall require a \$200 transfer fee to offset the*  
8           *cost of administration. The transfer fee may be waived or reduced by the*  
9           *Board upon a finding that a waiver or reduction is necessary to relieve the*  
10           *applicant from undue hardship and that loss of the fee will not jeopardize*  
11           *efficient administration of the program.*

12           (K) *For those properties approved by the Board for transfer to non-profit housing*  
13           *entities, transfer of title shall occur within sixty (60) days, or as soon after as*  
14           *practicable. Refusal of the receiving entity to accept title shall void approval*  
15           *of such transfer and shall result in the property being disposed of as provided*  
16           *by law.*

17           (L) *Property maintenance by Multnomah County shall cease upon transfer of the*  
18           *title to the receiving agency.]*

19       SECTION [VIII] VII - NEHEMIAH HOUSING OPPORTUNITY PROGRAM  
20       SUPPORT.

21           (A) The rights and obligations of NECDC under this ordinance to review lists of  
22           available tax foreclosed properties and to receive properties in the King,  
23           Humboldt, Boise and Vernon neighborhoods, in accordance with Resolution  
24           89-167, shall continue so long as NECDC shall sponsor and administer the  
25           Nehemiah Housing Opportunity Program (NHOP) contained in Title VI of the  
26           Housing and Community Development Act of 1987 and 24 CFR Part 280.

27       SECTION [IX] VIII- REPEAL OF PRIOR ORDINANCES

28           (A) Ordinances 560, 577, 613, 672, 685, 703, 753, and 769 are hereby repealed.  
29           This Ordinance, being necessary for the health, safety, and welfare of the  
30           people of Multnomah County, an emergency is declared, and the Ordinance

1           shall take effect upon its execution by the County Chair, pursuant to Section  
2           5.50 of the Charter of Multnomah County.

3       **SECTION IX - PROCEDURE FOR REQUESTING TRANSFER OF TAX**  
4       **FORECLOSED PROPERTY FOR OPEN SPACE, PARKS OR NATURAL AREAS**

5           (A) Requests for properties for open space, parks or natural areas will be  
6           considered according to procedures established by the Department in  
7           conjunction with Greenspace Review Committee.

8           (B) A list of properties remaining after transfer requests of governmental  
9           units, shall be submitted to the Greenspace Review Committee.

10          (C) The Greenspace Review Committee shall, within thirty (30) days after  
11          receipt of the list of available properties, advise the Department which  
12          properties meet the Committee's criteria for appropriate use as open  
13          spaces, parks or natural areas. Within ten (10) days thereafter, the  
14          Department shall mail a notice setting forth the list of available properties  
15          to neighborhood associations and nonprofit corporations that have  
16          requested the Department to provide such notice together with an  
17          application form.

18          (D) Written applications by nonprofit corporations shall be filed with the  
19          Greenspace Review Committee within forty-five (45) days after notice of  
20          property availability was first mailed. All requests shall be on the  
21          application forms provided with the notice.

22          (E) Within sixty (60) days after receipt of applications, the Greenspace  
23          Review Committee will prepare disposition recommendations to the  
24          Board. Recommendations shall be based on the sponsoring organization's  
25          stability and viability, the project plan, financial plan and community  
26          support.

27          (F) Within seven (7) days after the Greenspace Review Committee  
28          determines any property will not be transferred to an open space  
29          preservation sponsor, the Greenspace Review Committee shall provide  
30          the Department with a list of properties not required for open space,  
31          parks or natural areas. If such properties were also not selected by



1 AHDP, they may be added to the inventory of tax foreclosed properties  
2 available for disposition according to law.

3 **SECTION X - PROCEDURE FOR DISPOSITION OF REQUESTS FOR**  
4 **TRANSFER OF TAX FORECLOSED PROPERTY FOR HOUSING AND FOR**  
5 **OPEN SPACE, PARKS OR NATURAL AREAS**

6 (A) Not less than fifteen (15) days after receiving the recommendations from  
7 the Greenspace Review Committee and AHDP, the Board shall schedule  
8 a public hearing to receive public comments concerning the proposed  
9 property transfers.

10 (B) The Department shall publish notice of the scheduled hearing in a  
11 newspaper of general circulation in the County for two successive weeks.  
12 The notice shall state the description or location of the properties and  
13 that the Board will hear comments concerning the transfer at the hearing.  
14 A copy of the notice shall be mailed to the applicants and applicable  
15 neighborhood associations and to other persons requesting such notice.

16 (C) Approval of transfers shall be based upon the degree proposals for  
17 transfer are feasible and in the public interest. Transfers to Non-Profit  
18 Housing Sponsors may be for consideration or for no consideration.  
19 Transfers in connection with the County Affordable Housing  
20 Development Program shall require a \$200 transfer fee to offset the cost  
21 of administration. The transfer fee may be waived or reduced by the  
22 Board upon a finding that a waiver or reduction is necessary. Transfers  
23 to Open Space Preservation Sponsors shall be for consideration.

24 (D) For those properties approved for transfer to non-profit housing sponsors  
25 or to open space preservation sponsors, the transfer of title shall occur  
26 within sixty (60) days, or as soon after as practicable. Refusal of the  
27 receiving entity to accept title shall void approval of such transfer.

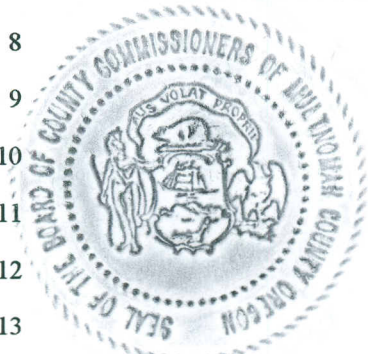
28 (E) A property approved for transfer to an open space preservation entity  
29 shall revert back to the County if the receiving entity ceases to use the  
30 property for the intended purpose set forth in this ordinance. The  
31 Department shall develop and implement a system for monitoring



1 compliance by the receiving open space preservation sponsors with the  
2 terms of transfer.


3 (F) Property maintenance by Multnomah County shall cease upon transfer of  
4 the title to the receiving entity.

5  
6 ADOPTED this 30th day of December, 1997, being the date of its second reading  
7 before the Board of County Commissioners for Multnomah County, Oregon



BOARD OF COUNTY COMMISSIONERS  
FOR MULTNOMAH COUNTY, OREGON

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31

  
Beverly Stein, Chair

REVIEWED:  
THOMAS SPONSLER, COUNTY COUNSEL  
FOR MULTNOMAH COUNTY, OREGON

  
John Thomas, Assistant County Counsel