

DISCLOSURE FORM
TOWN OF CORNWALL
FOR CALENDAR YEAR 2022

PLEASE COMPLETE THIS FORM IN FULL. LEAVE NO BLANKS. IF ANY SECTION OR PART THEREOF DOES NOT APPLY TO YOU, SO STATE BY INSERTING THE WORDS "NOT APPLICABLE" OR "NONE."

2. PERSONAL INFORMATION:

Rokhsa Michael-Razi
NAME

Council Member
TITLE

Town Bd.
TOWN DEPARTMENT/BOARD

19 Bridge street
HOME ADDRESS

HOME TELEPHONE NUMBER

Babak
SPOUSE'S NAME

Dr. Ardekani
NAME/AGE OF DEPENDENT

None
NAME/AGE OF DEPENDENT

NAME/AGE OF DEPENDENT

3. BUSINESS POSITIONS: List any office, trusteeship, directorship, partnership or other position in any business, association, property or not-for-profit organization, held by you, your spouse and/or your dependent(s), if any, as of the date of filing this statement, and indicate whether these entities are involved with the Town of Cornwall in any manner. All such positions described above which are acquired after the filing date of this statement must be disclosed within thirty days of acquiring such position by the filing of an amended statement.

<u>NAME OF FAMILY MEMBER</u>	<u>POSITION</u>	<u>ORGANIZATION</u>	<u>NATURE OF INVOLVEMENT</u>
	N/A		

4. INVESTMENTS: Itemize and describe all investments which represent five (5%) percent or more of the value in any business, corporation or partnership, if any, owned by you, your spouse and/or your dependent(s) as of the date of filing this statement. All such investments acquired after the filing date of this statement must be disclosed within 30 days of such acquisition by the filing of an amended statement.

<u>NAME OF FAMILY MEMBER</u>	<u>NAME AND ADDRESS OF BUSINESS</u>	<u>DESCRIPTION OF INVESTMENT</u>
	N/A	

5. REAL ESTATE: List the location and description of all real estate within the Town of Cornwall, including the Village of Cornwall-on-Hudson, if any, in which you, your spouse and/or your dependent(s), have an interest, regardless of its value, as of the date of filing this statement. Your primary residence need not be listed. Any real estate described above which is acquired after the date of filing this statement must be disclosed within 30 days of such acquisition by the filing of an amended statement.

<u>NAME OF FAMILY MEMBER</u>	<u>ADDRESS OF PROPERTY</u>	<u>DESCRIPTION OF PROPERTY</u>
	N/A	

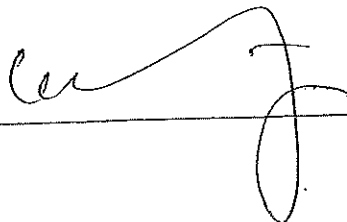
6. INTEREST IN CONTRACTS: Describe any interest you, your spouse, and/or your dependent(s) have in any contract involving the Town as of the date of filing this statement. Any interest in any contract involving the Town acquired after the date of filing this statement must be disclosed within thirty days of such acquisition by the filing of an amended statement.

<u>NAME OF FAMILY MEMBER</u>	<u>CONTRACT DESCRIPTION</u>
N/A	See update attached

ATTESTATION

I hereby certify under penalty of perjury that I have read the foregoing Disclosure Statement and that to the best of my knowledge and belief, it is true, correct and complete and that I have not and will not transfer any asset, interest or property for the purpose of concealing it from disclosure while retaining an equitable interest therein.

Dated: 15.02.2022, 20
Cornwall, New York



A handwritten signature in cursive script, appearing to be 'C. J.', written above a horizontal line.

Joshua Wojehowski

From: Rokhsha Michael-Razi
Sent: Monday, May 16, 2022 3:04 PM
To: Joshua Wojehowski; Kerry McGuinness (jkerrymcg@aol.com); Virginia Scott
Cc: Steve Gaba (sgaba@drakeloeb.com); Jennifer McCormick
Subject: Youth Tennis Lessons
Attachments: Opinion Letter.pdf

Dear Supervisor and Town Board Members,

I wanted to confirm for all of you that I will be providing youth tennis programming this Spring on the Town's public courts. The program is expected to run, starting Wednesday May 25th 3:00pm- 7:00pm to June 23rd. I will be holding tennis lessons for youth with help of dedicated junior staff and volunteers, on town courts. The courts have been reserved. I will be happy to pay any current or future rental fees that the Board may put into place. I have sought advice from our Town Attorney on this and all has been cleared legally and ethically. Find attached a copy of Mr. Gaba's letter on the matter. Should you have any questions about this, please reach out directly to the Town Attorney and Counsel to the Ethics Committee, Mr. Steve Gaba.

Thank you!

Rokhsha

James R. Loeb
Richard J. Drake, *retired*
Glen L. Heller*
Marianna R. Kennedy
Gary J. Gogerty
Stephen J. Gaba
Adam L. Rodd
Dominic Cordisco
Ralph L. Puglielle, Jr.
Nicholas A. Pascale
Alana R. Bartley**
Aaron C. Fitch

Judith A. Wayne
Meghan R. LoCicero
Michael J. Barfield**

Jennifer L. Schneider
Managing Attorney

*LL.M. in Taxation
**Member NJ & NY Bar

May 16, 2022

Via email @ rokhsa@cornwallny.gov
Rokhsa Michael-Razi
Town of Cornwall
Town Hall
183 Main Street
Cornwall, New York 12518

Re: Town of Cornwall - Request for Legal Opinion
Our Matter ID: 00254-72200

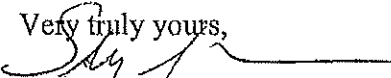
Dear Rokhsa:

Your proposal to give private tennis lessons to young persons on the public tennis courts in the Town Hall Park does not violate any provision of the State ethics laws or the Town's Ethics Code. The public tennis courts are open to anyone, and your proposal does not involve any contract with the Town or processing of an approval by the Town Board.

The applicable State ethics law provisions are General Municipal Law §801 and §809. GML Section 801 prohibits Town Board Members from having interests in contracts with the Town (with certain exceptions, such as contracts for less than \$750). GML Section 809 prohibits Town Board Members from participating in processing applications for approvals in which they or their family members have a personal financial interest. Since your proposal to provide private tennis lessons does not involve any contract with the Town or processing of an application for an approval by the Town Board, it does not violate GML §801 or GML §809.

The Town's Code of Ethics appears in Chapter 20 of the Town Code. The relevant section of Chapter 20 is §20-4 entitled "Standards of conduct". There is nothing in §20-4 that prohibits a Town Board Member from giving a private tennis lesson on a public tennis court in return for a fee from the student/trainee. Although not relevant, strictly speaking, to the ethics issue, I note that the private tennis lessons you propose to give are to be provided at a discounted rate well below the standard rate for such tennis lessons as a benefit to the youth in the Town of Cornwall to whom you have provided tennis lessons every year over the past several years.

I trust that this answers your inquiry.

Very truly yours,

STEPHEN J. GABA

SJG/ev/1077455
cc: Town Board