

AGENDA
TOWN OF GENEVA
REGULAR TOWN BOARD MEETING
January 12, 2021

Join Zoom Meeting

Find your local number: <https://us02web.zoom.us/j/kb0wkUd5q6>

Dial by your location

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Meeting ID: 845 8528 3483

2. **Call to order** 6:___ pm the Regular meeting directly following the Regular Town Board Meeting.

3. **Privilege of the floor.**

4. **Gratitudes.**

5. **Approval of the minutes:** Approval of the minutes of the Special year end Meeting of the Town Board of December 23, 2020.

Motion _____ Second _____

6. **Town Clerk's report.**

Questions, comments.
The Board acknowledges receipt.

7. **Code Enforcement Officer's report.**

Questions, comments.
The Board acknowledges receipt.

8. **Highway Superintendent's Report:**

Questions, comments.
The Board acknowledges receipt.

9. **Water & Sewer Superintendent's Report:**

Questions, comments.
The Board acknowledges receipt.

10. **Supervisor's report of finances for the previous month**

Questions, comments.
The Board acknowledges receipt.

11. **RESOLUTION NO. 16-2021**- Approving Abstracts, Bills for Payment and Prepaid Bills.

Motion _____ Second _____

**TOWN OF GENEVA, NEW YORK
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 16 -2021**

Whereas certain abstracts and bills for services and goods received or to be received by the town have been presented for payment or necessarily paid and

Whereas those abstracts and bills have been reviewed by the supervisor's bookkeeper, the supervisor and other members of the town board, and are in proper order for payment or approval, now therefore, it is

RESOLVED the pre-paid bills that are presented are approved and the supervisor is authorized to pay the unpaid bills.

12. **RESOLUTION NO. 17-2020** – Resolution introducing a Local Law and calling a Public Hearing: Tax Levy Limit.

Motion _____ Second _____

**TOWN OF GENEVA, NEW YORK
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 17 -2021**

WHEREAS, the Town Board of the Town of Geneva, after due deliberation, finds it in the best interests of the Town to schedule a public hearing to solicit public comment upon a proposed Local Law to override the tax levy limit established in General Municipal Law §3-c; and

WHEREAS, the Town Board of the Town of Geneva has reviewed the draft of the aforementioned proposed Local Law attached hereto as Exhibit "1" and deems it in the best interests of the Town of Geneva to proceed in accordance with the Code of the Town of Geneva and the Laws of the State of New York in adopting said Local Law,

NOW, THEREFORE, BE IT RESOLVED, that the Town Clerk be, and she hereby is, directed to schedule a public hearing to be held on February 9, 2021, at 6:00 p.m. at the Geneva Town Hall, 3750 County Road 6, Geneva, New York; and be it further

RESOLVED, that the Town Clerk, be and hereby is, authorized to forward to the official newspapers of the Town a Notice of Public Hearing in the form substantially the same as that attached hereto as Exhibit "2"; and be it further

RESOLVED, that the Town Clerk be, and she hereby is, directed to post a copy of the proposed Local Law on the Town of Geneva sign board and take any and all other necessary actions to properly bring the aforementioned Local Law before the Town Board of the Town of Geneva for its consideration; and be it further

RESOLVED, that the Town Clerk be, and hereby is, authorized to provide all other notices as required by law for the adoption of this local law.

I, Lorrie S. Naegele, Town Clerk of the Town of Geneva do hereby certify that the aforementioned resolution was adopted by the Town Board of the Town of Geneva on January 12, 2021, by the following vote:

	<u>Aye</u>	<u>Nay</u>
Mark Venuti	_____	_____
Jeffrey Dunham	_____	_____
Robert McCarthy	_____	_____
Mark Palmieri	_____	_____
Kimberly Aliperti	_____	_____

Dated: _____, 2021

Lorrie S. Naegele, Town Clerk

SEAL

13. RESOLUTION NO. 18-2021- Approving Audit Services by Allied CPAs, PC.

Motion _____ Second _____

**TOWN OF GENEVA, NEW YORK
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 18 -2021**

Whereas Allied CPAs, PC is the successor accounting group to the firm that performed the review of the town court and town clerk financial records, and assisted with the preparation of the supervisor's annual financial report to the NYS Comptroller in 2020, and is offering to perform the same services in 2021 at the same rate as in 2020 (totaling \$5,575), which amount is covered in the town budget (\$6,800 budgeted); now therefore, it is

RESOLVED the supervisor may sign the January 4, 2021 engagement letters for audit and review services by Allied CPAs, PC.

14. RESOLUTION NO. 19-2021- Authorizing Submission of a Community Development Block Grant Application.

Motion _____ Second _____

**TOWN OF GENEVA, NEW YORK
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 19 -2021**

WHEREAS, CCMI, Inc. (hereinafter the "Company") plans to construct and equip a new manufacturing facility on a parcel of land located on the east side of NYS Route 14 south of Gambee Road in the Town of Geneva (the "Project"); and

WHEREAS, the Project will have an estimated cost of \$1.5 million; and

WHEREAS, the Company has requested that the Town of Geneva (the "Town") apply for Community Development Block Grant funding for the Project from the New York State Office of Community Renewal (the "OCR") which would be used by the Town to make a grant to the Company to partially fund the Project costs; and

WHEREAS, the Project will create an estimated 5 new employment opportunities, including positions that will provide training to entry-level employees; and

WHEREAS, the Town has held a public hearing to obtain citizens' views regarding the Project and the CDBG program as administered by OCR;

NOW THEREFORE BE IT RESOLVED, that the Town Board of the Town of Geneva authorizes the Supervisor to submit a grant application to the OCR on behalf of the Town in an amount not to exceed \$100,000 to support the Project; and

BE IT FURTHER RESOLVED, that the Supervisor is authorized to execute a grant agreement between the Town and the OCR and all related documents associated with the OCR grant, including entering into a grant agreement with the Company for the implementation of the Project and administration of the OCR grant, all such documents to be subject to review and approval by the Town Attorney; and

BE IT FURTHER RESOLVED, the Supervisor is designated as the Certifying Officer responsible for all activities associated with the federal environmental review process to be completed in conjunction with the Project.

15. RESOLUTION NO. 20-2021- Authorizing Adoption of a Fair Housing Plan in Connection with Community Development Block Grant Funding.

Motion _____

Second _____

**TOWN OF GENEVA, NEW YORK
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 20 -2021**

WHEREAS, the Town of Geneva (the "Town") is applying for a grant from the New York State Housing Trust Fund Corporation (hereinafter the "HTFC") represented by the New York State Office of Community Renewal (hereinafter the "OCR") through the Community Development Block Grant (hereinafter "CDBG") Program for the purpose of assisting CCMI, Inc. in constructing and equipping a manufacturing facility within the Town (the "Project"), and

WHEREAS, OCR requires that a municipality receiving a grant of CDBG funds adopt a Fair Housing Plan and appoint a Fair Housing Officer; and

WHEREAS, the Town wishes to adopt a Fair Housing Plan in order to meet OCR requirements and permit the application for funding for the Project to go forward.

NOW THEREFORE BE IT RESOLVED, that the Town of Geneva Town Board hereby adopts the Fair Housing Plan, as presented to the Town Board and attached to this agenda; and

BE IT FURTHER RESOLVED, that the Town's supervisor, Mark Venuti, is appointed as the Town's Fair Housing Officer.

16. RESOLUTION NO. 21--2021: – Adoption of Section 3 CCMI Participation Plan with Community Development Block Grant Funding.

Motion _____

Second _____

**TOWN OF GENEVA, NEW YORK
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 21-2021**

WHEREAS, the Town of Geneva (the "Town") is applying for a grant from the New York State Housing Trust Fund Corporation (hereinafter the "HTFC") represented by the New York State Office of Community Renewal (hereinafter the "OCR") through the Community Development Block Grant (hereinafter "CDBG") Program for the purpose of assisting CCMI, Inc. in constructing and equipping a manufacturing facility within the Town (the "Project"), and

WHEREAS, OCR requires that a municipality applying for and receiving a grant adopt a Section 3 Participation Plan, which describes how the municipality will, to the greatest extent possible, provide job training, employment, and contract opportunities for low-or very-low income residents in connection with housing rehabilitation, housing construction or other public construction projects, in accordance with Section 3 of the Housing and Urban Development Act of 1968; and

WHEREAS, the Town wishes to adopt the Section 3 Plan in order to meet OCR requirements and permit the application for funding for the Project to go forward.

NOW THEREFORE BE IT RESOLVED, that the Town of Geneva Town Board hereby adopts the Section 3 Participation Plan for Section 3 Covered Contracts, as presented to the Town Board; and it is

FURTHER RESOLVED supervisor Mark Venuti is appointed the Section 3 Coordinator.

17. RESOLUTION NO. 22-2021- Adoption of Americans with Disabilities Act Notice of Non-Discrimination.

Motion _____

Second _____

**TOWN OF GENEVA
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 22-2021**

Whereas by Resolution 52-2016 the town board approved a Grievance Procedure required by the Americans with Disabilities Act of 1990 (ADA), and appointed the town supervisor the Designee for Reasonable Accommodation/ADA Coordinator; and

Whereas the ADA requires the town to approve a notice that it will comply with the ADA and will not discriminate against qualified individuals with disabilities on the basis of disability in its services, program, or activities; now therefore, it is

RESOLVED the Notice under the Americans with Disabilities Act attached to this agenda is adopted by the Town of Geneva.

18. RESOLUTION NO. 23-2021- Appointing Committee to Review Safety and Fire Protection.

Motion _____

Second _____

**TOWN OF GENEVA
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 23-2021**

Whereas the Town of Geneva is served by three volunteer fire associations, West Lake Road, White Springs and Northside, that annually contract with the Town, and are supported by property taxes; and

Whereas the work load of the three departments varies greatly, and the question of funding and coverage was discussed by the town board at its 2021 budget workshop this past October, and it was agreed a committee would be appointed to review the situation and report to the town board; now therefore, it is

RESOLVED a special committee to review safety and fire protection is established, to be chaired by town board member Robert McCarthy, and appointed as initial members of the committee are Josephine Perry, Mitchell Wilber, code enforcement officer Floyd Kofahl, supervisor Mark Venuti, and the chiefs of the three fire associations, or their designees, with the supervisor authorized to make further appointments or changes as needed; and it is further

RESOLVED the committee will endeavor to make its report to the town board by its June 8 meeting.

19. RESOLUTION NO. 24-2021- Reducing Town Planning Board to Five Members and Establishing Alternates.

Motion _____

Second _____

**TOWN OF GENEVA
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 24-2021**

Whereas the Town Planning Board is composed of seven members and no alternate, and this is unusual for area planning boards and makes establishing a quorum difficult; and

Whereas the Town Zoning Board of Appeals is composed of five members and no alternate, and alternates are useful for establishing a quorum and having someone ready to become a regular member when a vacancy occurs; now therefore, it is

RESOLVED the Town of Geneva Planning Board will be reduced to five members, and one alternate member who shall serve on the board when a regular member is absent, the reduction to be accomplished as soon as practical, with the alternate being paid when attending a meeting either as an alternate or when participating in the stead of an absent regular member; and it is further

RESOLVED one alternate is authorized for the Town of Geneva Zoning Board of Appeals, to be paid when attending a meeting either as an alternate or when participating in the stead of an absent regular member.

20. RESOLUTION NO. 25-2021- Authorizing a Phishing Assessment Program.

Motion _____

Second _____

**TOWN OF GENEVA
RESOLUTION OF THE TOWN BOARD
RESOLUTION NO. 25-2021**

Whereas the Town's data needs to be secure, and computer hackers have become more sophisticated in tricking unsuspecting users to allow them into their systems and data; and

Whereas the Town's data hosting and computer services company, Integrated Systems, has a three-month phishing assessment program that will allow the town to gauge its vulnerability and determine if training is warranted, at a cost of \$425.00; now therefore, it is
RESOLVED the supervisor is authorized to contract with Integrated Systems for its Phishing Assessment Program at a cost of \$425.00.

21. Request by Charles Pitifer, 218 Carter Road, to have his property rezoned from R-1 to R-5

22. Reports of Standing Committees

Economic Development –

Sustainability –

Kashong Conservation Area -

Communication –

Parks and Recreation –

Agricultural Enhancement –

23. Supervisor's Report:

Work on the Seneca-Keuka Nine-Element Watershed Plan continues. Ian Smith, the Seneca Watershed Steward, has identified a grant opportunity for work in the town's property off Carter Road that was donated by Bill Riker.

The supervisor has been reappointed to the county Sustainability and Solid Waste Management Committee and the Public Safety Committee.

Selected Meetings and Activities

December 9 – County Public Safety Committee meeting.

December 12 – Town Bike Park was covered with tarps by volunteers.

December 15 – Geneva 2030 executive board meeting.

December 16 – County Soil and Water Conservation District board of directors meeting

December 17 – County Board of Supervisors meeting

December 18 – Ted Baker radio show on town topics

December 28 – Conference with Finger Lakes Land Trust director.

December 30 – County Shared Services panel meeting

January 7 – Nine-Element Watershed Plan executive group meeting

County Board of Supervisors meeting

January 11 – Meeting with new county administrator Chris DeBolt.

24. Old Business.

25. New Business.

Letter from Tom Geary about traffic flow through the Recycling and Disposal Station and Townside at PreEmption.

Request by Becky Achilles of TOPS (take off pounds sensibly) group to use the old town hall at 32 White Springs Road on Tuesdays from 5:15 to 6:15 for members to stop by and weigh in; there are 10-15 members who will come in, wearing masks, for a few minutes each; the town highway superintendent is fine with it on a trial basis.

26. Privilege of the floor.

27. Adjourn: Time _____

Motion _____

Second _____

Exhibit 1

LOCAL LAW FILING

New York State Department of State
Division of Corporations, State Records and Uniform Commercial Code
One Commerce Plaza, 99 Washington Avenue
Albany, NY 12231-0001

(Use this form to file a local law with the Secretary of State)

Text of law should be given as amended. Do not include matter being eliminated and do not use italics or underlining to indicate new matter.

County
City
Town of Geneva
Village

Local Law No. ____ of the year **2021**

A local law to override the tax levy limit established in General Municipal Law §3-c
(Insert Title)

Be it enacted by the **Town Board** (Name of Legislative Body)

County
City
Town of Geneva
Village

as follows:

Section 1:Legislative Intent

It is the intent of this local law to override the limit on the amount of real property taxes that may be levied by the Town of Geneva, County of Ontario pursuant to General Municipal Law §3-c, and to allow the Town of Geneva to adopt a town budget for (a) town purposes (b) fire protection districts and (c) any other special or improvement district governed by the town board for the fiscal year 2022 that requires a real property tax levy in excess of the "tax levy limit" as defined by General Municipal Law §3-c.

Section 2:Authority

This local law is adopted pursuant to subdivision 5 of General Municipal Law §3-c, which expressly authorizes the town board to override the tax levy limit by the adoption of a local law approved by a vote of sixty percent (60%) of the town board.

Section 3:Tax Levy Limit Override

The Town Board of the Town of Geneva, County of Ontario, is hereby authorized to adopt a budget for the fiscal year 2022 that requires a real property tax levy in excess of the limit specified in General Municipal Law §3-c.

Section 4:Severability

If any clause, sentence, paragraph, section, or part of this local law or the application thereof to any person, firm or corporation, or circumstance, shall be adjudged by any court of competent jurisdiction to be invalid or unconstitutional, such order or judgment shall not affect, impair, or invalidate the remainder thereof, but shall be confined in its operation to the clause, sentence, paragraph, section, or part of this local law or in its application to the person, individual, firm or corporation, or circumstance directly involved in the controversy in which such judgment or order shall be rendered.

Section 5:Effective Date

This local law shall take effect immediately upon filing with the Secretary of State.

(Complete the certification in the paragraph that applies to the filing of this local law and strike out that which is not applicable.)

1. (Final adoption by local legislative body only.)

I hereby certify that the local law annexed hereto, designated as Local Law No. ____ of 2021 of the **Town of Geneva** was duly passed by the Geneva Town Board on _____, 2021, in accordance with the applicable provisions of law.

2. (Passage by local legislative body with approval, no disapproval or repassage after disapproval by the Elective Chief Executive Officer¹.)

I hereby certify that the local law annexed hereto, designated as local law No. _____ of 20__ of the (County)(City)(Town)(Village) of _____ was duly passed by the _____ on _____, 20__, and was (approved)(not approved)(repassed after disapproval) by the _____ and was deemed duly adopted on _____, 20__ in accordance with the applicable provisions of law.

3. (Final adoption by referendum.)

I hereby certify that the local law annexed hereto, designated as local law No. _____ of 20__ of the (County)(City)(Town)(Village) of _____ was duly passed by the _____ on 20__, and was (approved)(not approved)(repassed after disapproval) by the _____ on _____, 20__. Such local law was submitted to the people by reason of a (mandatory)(permissive) referendum, and received the affirmative vote of a majority of the qualified electors voting thereon at the (general)(special)(annual) election held on _____, 20__, in accordance with the applicable provisions of law.

4. (Subject to permissive referendum and final adoption because no valid petition was filed requesting referendum.)

I hereby certify that the local law annexed hereto, designated as local law No. _____ of 20__ of the (County)(City)(Town)(Village) of _____ was duly passed by the _____ on _____, 20__, and was (approved)(not approved)(repassed after disapproval) by the _____ on _____, 20__. Such local law was subject to permissive referendum and no valid petition requesting such referendum was filed as of _____, 20__, in accordance with the applicable provisions of law.

5. (City local law concerning Charter revision proposed by petition.)

I hereby certify that the local law annexed hereto, designated as local law No. _____ of 2005 of the City of _____ of having been submitted to referendum pursuant to the provisions of section (36)(37) of the Municipal Home Rule Law, and having received the affirmative vote of a majority of the qualified electors of such city voting thereon at the (special)(general) election held on _____, 20__, became operative.

6. (County local law concerning adoption of Charter.)

I hereby certify that the local law annexed hereto, designated as local law No. _____ of 20__ of the County of _____, State of New York, having been submitted to the electors at the General Election of November __, 20__, pursuant to subdivisions 5 and 7 of section 33 of the Municipal Home Rule Law, and having received the affirmative vote of a majority of the qualified electors of the cities of said county as a unit and a majority of the qualified electors of the towns of said county considered as a unit voting at said general election, became operative.

(If any other authorized form of final adoption has been followed, please provide an appropriate certification.)

I further certify that I have compared the preceding local law with the original on file in this office and that the same is a correct transcript therefrom and of the whole of such original local law, and was finally adopted in the manner indicated in paragraph 1, above.

Town Clerk

(Seal)
Exhibit 2

Date: _____

TOWN OF GENEVA

¹ Elective Chief Executive Officer means or includes the chief executive officer of a county elected on a county-wide basis or, if there be none, the chairperson of the county legislative body, the mayor of a city or village, or the supervisor of a town where such officer is vested with the power to approve or veto local laws or ordinances.

NOTICE OF PUBLIC HEARING

PLEASE TAKE NOTICE, that a public hearing will be held by the Town Board of the Town of Geneva on the 9th day of February, 2021, at 6:00 p.m., at the Geneva Town Hall, 3750 County Road 6, Geneva, New York, regarding the adoption of a Local Law which would permit the Town Board to adopt a budget for the 2022 fiscal year that requires a real property tax levy in excess of the amount otherwise prescribed in General Municipal Law §3-c.

Any resident of the Town of Geneva shall be entitled to be heard upon said proposed Local Law at such public hearing. Copies of said proposed Local Law are available for review at the Town of Geneva Town Hall, 3750 County Road 6, Geneva, New York.

This by Resolution of the Town Board of the Town of Geneva.

Lorrie S. Naegele, Town Clerk

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), the Town of Geneva will not discriminate against qualified individuals with disabilities on the basis of disability in its services, program, or activities.

Employment: the Town of Geneva does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: the Town of Geneva will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Town of Geneva programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: the Town of Geneva will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in Geneva offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the Town of Geneva, should contact the office of the ADA Coordinator, Town Supervisor, at 3750 County Road 6, Geneva, New York 14456, (315) 789-3922 or e-mail at supervisor@townofgeneva.com as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Town of Geneva to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the Town of Geneva is not accessible to persons with disabilities should be directed to ADA Coordinator, Town Supervisor, at 3750 County Road 6, Geneva, New York 14456, (315) 789-3922 or e-mail at supervisor@townofgeneva.com .

The Town of Geneva will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

**FAIR HOUSING PLAN
TOWN OF GENEVA**

I. Introduction

The Town of Geneva understands the importance of taking action to further fair housing in the community and is committed to meeting its responsibilities in this respect as a recipient of Federal Community Development Block Grant funds. To ensure that residents are aware of fair housing provisions under Federal and State law and of the processes and assistance available to obtain compliance with existing statutes, the Town has developed this Fair Housing Plan. The Plan describes the procedures developed to further fair housing in the community.

II. Availability Of Information

The Town's Fair Housing Plan recognizes that public knowledge of fair housing provisions is the first step in expanding equal opportunity. Toward that end, the Town has taken, or will take the following actions:

A. *Appoint a Fair Housing Officer*

The Fair Housing Officer, supervisor Mark Venuti, appointed by the Town Board, has the following responsibilities:

1. Maintain Federal and State fair housing information in the Community Development Department including brochures issued by the U. S. Department of Housing and Urban Development (HUD) and the New York State Division of Human Rights.
2. Record initial information regarding housing discrimination complaints on a standard form.
3. Forward copies of all complaints to and, as appropriate, consult with the Fair Housing/Equal Opportunity Division of the applicable HUD Office.

B. *Provide Information*

The Town will make available, upon request, copies of applicable Federal and State laws which contain anti-discrimination provisions, including: Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Fair Housing Amendments Act of 1988 and the Human Rights Law (Executive Law, Article 15) of the State of New York.

C. *Promote Fair Housing Activities and Available Resources*

The Town will designate the month of April as *Fair Housing Month* and will promote said designation through a Town Board proclamation.

The Town will further promote fair housing and housing resources by posting Fair Housing posters in visible locations within all Municipal buildings.

III. Discrimination Complaints

The Town will provide information and assistance to individuals who feel that they have been the victims of discrimination in regard to housing.

A. *Discriminatory Housing Practices*

For the purpose of this Plan, a discriminatory housing practice means an act that is unlawful under sections 804, 805, 806 or 818 of the Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended). Such discriminatory housing practices include discrimination in the sale or rental of housing, discrimination in the provision of brokerage services, or interference, coercion, or intimidation, as defined under the Act, on the basis of race, color, religion, national origin, sex, handicap or familial status.

B. *Receiving Complaints*

The Fair Housing Officer will record information on a standard form to ensure that a complete file is established. Following this, the Fair Housing Officer will then contact the Department of HUD and/or the New York State Division of Human Rights to review the particulars of the complaint and request guidance in the formal filing of the complaint in cases where the individual decides to use this method. Copies of all complaints will also be forwarded to the Fair Housing and Equal Opportunity Division of the HUD Office in Buffalo, New York. If the complainant decides to take his/her case directly to Federal Court, the Town will consult with the County Bar Association on the appropriate procedures to be followed and the procedure for securing affordable legal services if the individual is of low- or moderate-income.