



Chautauqua, Cattaraugus, Allegany and Steuben Counties

Southern Tier Extension Railroad Authority

Center for Regional Excellence, 4039 Route 219, Suite 200, Salamanca, New York 14779
TEL (716) 945-5301 FAX (716) 945-5550 TDD (716) 945-5301

“This institution is an equal opportunity organization”

Steven Havey, Chairman
Lisa Keck, Chief Executive Officer

FINANCIAL DISCLOSURE AND ETHICS REPORT

March 30, 2026

This is STERA management’s report for the year 2025 regarding issues arising from financial issues and ethical issues arising from STERA operations and/or as indicated by the Ethics Forms (financial disclosure forms) submitted by STERA Board members and STERA Corporate Officers to the Cattaraugus County Attorney’s Office by April 30, 2025.

A. Compliance with Financial Disclosure Filing Requirements:

Although several Board members did not complete and transmit the required Ethics Form to the Cattaraugus County Attorney’s Office by the April 30, 2025 deadline, all Board members and Corporate officers subsequently did complete and transmit the required Ethics Form to the Cattaraugus County Attorney’s Office. Excepting the timely submission of the required Ethics Form by some Board members, STERA is in compliance with the NYS ABO Policy Guidance 07-02 annual filing requirement regarding financial disclosure.

B. Disclosures of Actual or Potential Financial Issues or Ethical Issues in Ethics Forms Filed Per NYS ABO Policy Guidance 07-02:

The Cattaraugus County Attorney’s Office has indicated, and STERA management staff has confirmed, that there were no disclosures in the Ethics Forms (financial disclosure forms) submitted by STERA Board members and STERA Corporate Officers to the Cattaraugus County Attorney’s Office that indicated that any STERA Board members or STERA Corporate Officers might be in a situation of actual or potential conflict of interest or where their independent judgment in the exercise of their duties for STERA may be impaired.

C. Other Issues Arising from STERA Operations:

None

D. Summary:

There do not appear to be any financial issues or ethical issues arising from STERA operations and/or as indicated by the Ethics Forms (financial disclosure forms) submitted by STERA Board members and STERA Corporate Officers to the Cattaraugus County Attorney’s Office that would indicate that any STERA Board members or STERA Corporate Officers might be in a situation of actual or potential conflict of interest or where their independent judgment in the exercise of his duties for STERA may be impaired.

Submitted to the STERA Governance Committee

On March 30, 2026

By



Lisa Keck

STERA Corporate CEO