



Chautauqua, Cattaraugus, Allegany and Steuben Counties

# Southern Tier Extension Railroad Authority

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"This institution is an equal opportunity organization"

Frank "Jay" Gould, Chairman  
Richard Zink, Chief Executive Officer

## FINANCIAL DISCLOSURE AND ETHICS REPORT

June 10, 2024

This is STERA management's report for the year 2023 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, 2024.

### 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, 2023 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:

STERA is not aware of any other issues or potential issues at this time

### 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 June 10, 2024  
By

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STERA Corporate Secretary

Approved by the STERA Governance Committee  
And STERA Board of Directors  
On June 10, 2024

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STERA Corporate Secretary