Improving Ethical & & Financial Disclosure For Local Government Elected Officials

May 28, 2018

Buffalo Niagara Coalition for Open Government, Inc.

The Buffalo Niagara Coalition for Open Government, Inc. is a non-profit, nonpartisan organization comprised of journalists, activists, attorneys, educators, and other concerned citizens who value open government and freedom of information.

Mission Statement:

Through education and civic engagement, the Buffalo Niagara Coalition for Open Government advocates for open, transparent government and defends citizens' right to access information from public institutions at the city, county, and state levels.

Statement of Purpose:

We believe that, if government is of the people, by the people and for the people, then it should also be open *to* the people. Government exists to serve its citizens, so access to public information should be simple. Freedom of Information Laws and the NY Open Meetings Law make access to public records a right.

When government operates openly and honestly, we, the people, can hold our elected officials accountable, fulfilling our duties as an informed citizenry. The Buffalo Niagara Coalition for Open Government works to ensure that all people have full access to government records and proceedings on the city, county, and state levels. Such access fosters responsive, accountable government, stimulates civic involvement and builds trust in government.

Buffalo Niagara Coalition for Open Government, Inc.

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Our meetings are typically held at 5:30 p.m. the first Thursday of the month, at the Williamsville Library, 5571 Main Street. Board President Paul Wolf, Esq. can be contacted at 435-4976, or by email at paulwolf2@gmail.com. Our website is www.nyopengov.org and we have a Facebook page.

INTRODUCTION

The Buffalo Niagara Coalition for Open Government evaluated the Annual Financial Disclosure Forms utilized by ten municipalities in Erie and Niagara County. The Disclosure Forms were ranked from best to worst based on criteria we established.

The ten municipalities reviewed were: Cheektowaga, Erie County, Buffalo, Town of Hamburg, Niagara Falls, Town of Lancaster, Amherst, Town of Tonawanda, Clarence, Niagara County.

THE PURPOSE OF FINANCIAL DISCLOSURE

The public has an interest in knowing whether a public official is profiting from office; and the public has an interest in knowing those financial interests that can affect a public official's actions.

Financial disclosure provides accountability, and encourages open and honest government by allowing the public and the news media access to information which may reveal potential conflicts of interest, hopefully before they occur.

Mark Davies, a recognized expert in the field of New York government ethics stated the following:

"The purpose of annual disclosure, like that of ethics laws generally, lies in preventing conflicts of interest violations (unethical conduct) from occurring in the first place. Annual disclosure accomplishes that purpose by disclosing to supervisors, co-workers, the public, the media, and the filer himself or herself where the filer's potential conflicts of interest lie—and by doing so helps prevent those potential conflicts from becoming actual conflicts. In addition, annual disclosure should force filers to focus, at least once a year, on the requirements of the applicable ethics code."

THE LAW REGARDING FINANCIAL DISCLOSURE

Article 18 of the New York State General Municipal Law sets forth the provisions regulating conflicts of interest for municipal officers and employees. It applies to all municipalities in the state, except New York City. "Municipality" is broadly defined to include counties, cities, towns, villages, school districts and other local government entities as well.

"Municipal officer or employee" is likewise broadly defined to include all officers and employees of the municipality, whether paid or unpaid, including board and commission members. The provisions of Article 18 fall into five areas: (1) the prohibitions on interests in contracts with the municipality; (2) miscellaneous provisions on conflicts of interest (e.g., gifts, and appearances before municipal agencies); (3) administration {local ethics laws, local ethics boards); (4) disclosure in certain land use applications; and (5) annual financial disclosure.

New York's General Municipal Law requires "political subdivisions," such as, counties, cities, towns, and villages with a population of 50,000 or more, to establish an annual financial disclosure system. Municipalities with a population less than 50,000 may also adopt such a system but are not required to do so.

The 50,000 population threshold means very few counties, cities, towns and villages have to comply with the financial disclosure law. For example, Erie County consists of forty-five local governments, which includes the county itself, three cities, twenty-five towns and sixteen villages. Of these forty-five local governments, only six have a population over 50,000 people (Erie County, Buffalo, Amherst, Cheektowaga, Town of Tonawanda and Town of Hamburg). Niagara County consists of twenty-one local governments and the only one that has a population over 50,000 people, is the county itself. In Erie and Niagara County only seven local governments out of sixty-five are required by law to complete financial disclosure forms.

To their credit some communities with a population under 50,000, voluntarily require their elected officials to complete annual financial disclosure forms. The Town of Lancaster (population 41,600) and the Town of Clarence (population 30,600), while not required by state law have adopted the practice of financial disclosure.

North Tonawanda, Town of Lewiston, Village of Lewiston, West Seneca, City of Lockport, Town of Lockport, Orchard Park, Wheatfield, all have populations under 50,000 and do not require their elected officials to complete an annual disclosure form.

Local governments have broad discretion to design their own annual financial disclosure form and filing system. If a political subdivision fails to adopt its own form, it must utilize a form and filing system prescribed by Section 812 of the General Municipal Law.

The General Municipal Law requires the governing body of each county, city, town, village, school district to adopt a code of ethics setting forth standards of conduct reasonably expected of their officers and employees.

Knowing and intentional violations of the provisions of Article 18 are punishable by a civil penalty, which is capped at \$10,000 plus the value of any gift, compensation or benefit received. In lieu of a penalty, violations may be referred to an appropriate prosecutor. The violation is then punishable upon conviction as a class A misdemeanor.

EXAMPLES OF FINANCIAL DISCLOSURE VIOLATIONS

Mount Vernon, NY Mayor Richard Thomas was indicted just weeks ago for allegedly stealing \$12,900 from his 2015 campaign committee for his personal use. The Attorney General's Office claims Thomas also diverted more than \$45,000 from his inaugural committee for personal use. Thomas is also charged for allegedly lying on his reports to the Board of Elections and on his City of Mount Vernon financial disclosures.

Former Nassau County Executive Edward Mangano, his wife Linda and a former Oyster Bay town supervisor John Venditto, were indicted on charges that Mangano and Venditto received bribes and kickbacks to help a Long Island businessman, Harendra Singh, obtain guaranteed loans. Mangano's wife Linda, prosecutors claim, was given a \$100,000-a-year, no-show job at one of the Singh's restaurants, enabling her to make \$450,000 while doing little besides tasting food. Edward Mangano also is accused of accepting vacations and other gifts in exchange for his influence.

In 2016, Joanne Yepsen, the Mayor of Saratoga Springs NY, was cited for violating their ethics code when at the same time a local hospital had a zoning issue pending before the City Council, the mayor was looking for work as a consultant with the hospital's foundation.

In October of 2016, the Commission charged a Department of Corrections employee for violating ethics law for his involvement in hiring his nephew at the prison where he worked. The employee admitted that he supervised a subordinate during the interview process and directly took part in selecting his nephew for the job over another candidate, a violation of the State Public Officers Law, which says that no employee should take part in a decision to hire a relative for a paid position at or for any state agency.

In December of 2017, the Commission charged a Metropolitan Transportation Authority employee for not disclosing income he earned over a two-year period from an outside job that was a conflict of interest.

In 2015, The New York Public Interest Research Group in conjunction with Reinvent Albany prepared a report titled *Serving Two Masters, Outside Income and Conflict of Interest in Albany*. The report documented many cases of state legislators violating financial disclosure laws. A few examples are provided below:

Joseph L. Bruno, the former Senate Majority Leader, was convicted in part on his failure to disclose hundreds of thousands of dollars in payments from a businessman who sought help from the Legislature. Andrew T. Baxter, the acting United States attorney for the Northern District of New York, said, "We established at this trial that Bruno exploited his office by concealing the nature and source of substantial payments that he received from parties that benefited from his official actions."

Sheldon Silver: The Assembly Speaker was indicted for allegedly being paid some \$4 million over the past decade for legal work that he failed to perform and in some instances failed to disclose.

John Sampson: Former Senate Majority Leader was indicted on charges that while a sitting New York State Senator he allegedly embezzled some \$400,000 in funds he was entrusted to oversee in his private law practice and kept secret his ownership interest in a liquor store.

Anthony Seminerio: Former Assemblymember Seminerio died in Federal Prison in January 2011 while serving a six-year sentence for his conviction on influence-peddling charges related to his operation of a private consulting business that used his legislative position to generate income.

Nicholas Spano: Former Senator Nicholas Spano pleaded guilty to Federal charges of hiding outside consulting fees he received from an insurance brokerage firm doing business with the state from 1993 to 2008, two years after he left office. Spano also failed to make required disclosures on his state ethics filings.

CRITERIA USED TO EVALUATE DISCLOSURE FORMS

After reviewing local government financial disclosure forms across New York State, the Buffalo Niagara Coalition for Open Government, Inc. created a list of the items that we believe should be included in every disclosure form.

We relied heavily on a Model Form created by Mark Davies, Esq. Mr. Davies served as the Executive Director of the New York City Conflicts of Interest Board, and is the former Executive Director of the Temporary State Commission on Local Government Ethics. Mr. Davies has published many articles on government ethics and financial disclosure and is recognized as an expert in this field.

The Davies Form addresses ten items and signers are required to certify that the information is true. A copy of the Model Form is attached as Exhibit A, along with copies of each municipalities disclosure form. The ten items addressed in the Davies Model Form are:

- 1) Outside Employers & Businesses List the name of every employer or business other than your government employment from which you received more than \$1,000. Provide the same information for your relatives which includes your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters.
- 2) **Investments** List the name of any entity in which you have an investment of at least 5% of the stock or debt or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.
- 3) **Real Estate** List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.
- 4) **Gifts** List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75).
- 5) **Political Contributions** List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

- 6) **Relatives in Service** List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.
- 7) **Volunteer Positions** List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.
- 8) **Money You Owe** List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days. (The Coalition believes the \$10,000 figure is high and should be \$1,000).
- 9) **Money Owed to You** List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives. (The Coalition believes the \$10,000 figure is high and should be \$1,000).
- 10) Customers and Clients List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.
- 11) Certification The Model Form requires the signer to certify that the information provided is true and that the municipalities ethics code has been read within the past two weeks. Mr. Davies suggests that a copy of the code of ethics (not the entire ethics law, just the code itself) should be attached to the disclosure form, if the code is sufficiently short. If it is not, then a summary, of no more than two pages, should be attached.

In addition to the items contained in the Davies Model Form, the following items are important and should be included on every local government financial disclosure form:

12) **Interest in Contracts** – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

- 13) **Political Parties** List any position you, your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.
- 14) **Third Party Reimbursements** Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.
- 15) **Future Employment** Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.
- 16) **Past Employment** Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Using the above stated sixteen items, we reviewed the Disclosure Forms from ten local governments in Erie and Niagara County.

DISCLAIMER

This is not a scientific study with precise results. The Buffalo Niagara Coalition for Open Government, Inc., consists of concerned volunteers who assisted with completing this report.

RANKING OF LOCAL GOVERNMENT DISCLOSURE FORMS FROM BEST TO WORST

1) Cheektowaga & Erie County (12 of the 16 items are addressed)	75%
2) Town of Hamburg, Buffalo & Niagara County (11 of the 16 items are addressed)	69%
3) Niagara Falls (10 of the 16 items are addressed)	62.5%

4) Town of Lancaster (4 of the 16 items are addressed)

5) Town of Tonawanda (3 of the 16 items are addressed)

6) Amherst & Clarence (2 out of 16 items are addressed)

INTERESTING FINDINGS/RECOMMENDATIONS

1) Information Regarding Spouses and Other Relatives Needs to Be Required

25%

19%

In some municipalities disclosure forms request information regarding the elected official only and not their spouse, adult children or other relatives. Knowing what businesses are owned by a registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters is important information.

Whether these individuals are on the municipal payroll is important information for conflicts of interest and nepotism concerns as well. Of the ten municipalities reviewed, Cheektowaga is the only one that requires the disclosure of relatives working on the Town payroll.

2) The Threshold for Reporting Gifts Varies Greatly

The dollar figure required for reporting gifts are:

Cheektowaga \$25 and up
Lancaster \$75 and up
Buffalo \$100 and up
Niagara County & Hamburg \$250 and up
Erie County & Niagara Falls \$1,000 and up

Amherst, Clarence and Tonawanda do not specifically ask about gifts. In most municipalities only gifts to the elected official and not their spouse or children need to be disclosed.

3) Large Campaign Contributors Should Be Listed on Disclosure Forms

Elected officials know who their big campaign contributors are and so should the public. While campaign reports are filed with the New York State Board of Elections and posted online, information regarding large campaign contributors should be listed on local government disclosure forms. None of the municipalities reviewed require the reporting of any campaign contributions. The threshold dollar amount for such disclosure whether it be \$100, \$500 or \$1,000, should be determined by each municipality. The Davies Form can serve as a model for this item.

4) Largest Business Customers for Elected Officials who own a Business Should be Disclosed

None of the municipalities reviewed require the disclosure of business customers of \$1,000 or more. Elected officials, their spouses and other relatives who own a business know who their largest customers are and so should the public. The Davies Form can serve as a model for this item.

5) Money Owed to an Elected Official, their Spouse and Children Should be Disclosed

Cheektowaga and Niagara Falls are the only municipalities that ask about money owed to an elected official. None of the municipalities reviewed ask about money owed to a spouse or children. The Davies form can serve as a model for this item.

6) Political Party Involvement for Elected Official, Spouse and Children Should be Disclosed

Six municipalities ask about political party involvement regarding the filer only and not their spouse (Erie County, Cheektowaga, Niagara County, Buffalo, Hamburg, Niagara Falls). Four municipalities do not request information regarding political party involvement (Lancaster, Amherst, Tonawanda, Clarence). Political party involvement should be disclosed for the government employee, their spouse and children.

7) Disclosure Forms for Elected Officials Should be Posted Online

The annual financial disclosure forms for every state elected official have been posted online for the public to see, since 2011. Disclosure forms for local elected officials are typically not posted online and they should.

Recently Hamburg Supervisor James Shaw became the first elected official in Erie and Niagara County to post his disclosure form online! Niagara Falls Mayor Paul Dyster has publicly stated that he will post his disclosure form online. The ethics law in Orange County, NY requires local elected official disclosure forms to be posted online and can serve as a model for others.

8) Niagara County's Local Law Preventing the Public from Viewing Disclosure Forms Needs to be Changed

In 1996 the Niagara County Legislature passed a local law that prevents citizens from viewing the disclosure forms completed by elected officials. In Niagara County, disclosure forms are confidential and can only be viewed by the Sheriff, Ethics Board and District Attorney. Every other local government reviewed in Erie and Niagara County allows citizens to file a FOIL to view disclosure forms.

What is the point of having disclosure forms if no one can see them? Several NY appellate court decisions have ruled that financial disclosure forms completed by government officials are a public record. Niagara Counties local law should be changed.

9)Disclosure Forms Should be Certified/Sworn to

Only three of the ten municipalities (Erie County, Cheektowaga, Clarence) reviewed require the individual signing the disclosure form to certify, swear to or affirm that the information being provided is truthful. None of the municipalities reviewed require the signer to acknowledge that they have read the ethics code. Requiring elected officials and governmental employees to read a local government ethics code as part of the disclosure form process is an important educational piece. Government officials should acknowledge that they have read the ethics code they are obligated to follow.

10) Disclosure Forms Should be Required for all Municipalities

New York State Law currently requires municipalities with a population of 50,000 or more to have elected officials and policy making positions to complete annual financial disclosure forms. In Erie County only six out of forty-four local governments (County, City, Town, Village) are above 50,000 in population. In Niagara County only one out of twenty-one local governments are above 50,000 (Niagara County).

Governor Andrew Cuomo in 2016 proposed that all local governments regardless of population size be required to complete financial disclosure forms. The Governor's proposal did not become law. All local governments regardless of population size should voluntarily adopt the practice of completing financial disclosure forms as a way to promote ethics and transparency.

CONCLUSION

The determining factor in what needs to be disclosed by elected officials in each municipality is the ethics code that has been adopted. In order to implement the disclosure changes recommended in this report, existing ethics codes will have to be amended.

Our goal is that the evaluated municipalities will interpret this report as constructive criticism. We are interested in assisting local governments to improve their annual financial disclosure forms so that citizens can have access to important information.

Financial disclosure provides accountability, and encourages open and honest government by allowing the public and the news media access to information which may reveal potential conflicts of interest, hopefully before they occur.

Members of the Buffalo Niagara Coalition for Open Government, Inc. welcome the opportunity to speak about this report at an upcoming meeting of any of the local governments that were studied. We are willing to work with and to assist local governments interested in improving their disclosure forms.

Evaluation of Disclosure Forms, Best to Worst

Cheektowaga	Pages 14 - 17
Erie County	17 - 20
Hamburg	20 - 23
Buffalo	23 - 26
Niagara County	26 - 29
Niagara Falls	29 - 32
Lancaster	32 - 35
Tonawanda	35 - 38
Amherst	38 - 41
Clarence	41 - 44

Cheektowaga

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Cheektowaga requests this info for elected official, spouse and adult members of household. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Cheektowaga requests information on investments that exceed \$5,000, for elected official, spouse and adult members of household. (Full credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Cheektowaga requests the address of real estate for the elected official, spouse and adult children, located in Cheektowaga, Sloan and Depew, but excludes listing personal residences. (Half credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Cheektowaga requests information regarding gifts in excess of \$25. (Full credit)

Political Contributions - List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election.

(The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Cheektowaga does not request information regarding political contributions. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Cheektowaga requests information regarding relatives on the Town payroll. (Full credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Cheektowaga does ask for volunteer information. (Full credit)

Money You Owe — List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Cheektowaga asks for information regarding any liability over \$5,000, other than a loan from a financial institution or business entity granted on terms made available to the general public. Credit card debt does not have to be reported. (Half credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Cheektowaga asks for information owed to the elected official in excess of \$1,000, excluding relatives. (Half credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Cheektowaga does not ask for information regarding business clients/customers. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Filers are required to affirm under the penalty of perjury that the information is true. Individuals are not required to acknowledge that they read the ethics code. (Half credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Cheektowaga requests information regarding the elected official, spouse, children and adult members of household interest in contracts. (Half credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Cheektowaga requests information regarding elected official political party involvement. (Half credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Cheektowaga requests information regarding third party reimbursement. (Full credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Cheektowaga does not request information regarding future employment. (No credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Cheektowaga does not request information regarding past employment. (No credit)

Total – Out of the 16 items in our criteria, the Cheektowaga Disclosure Form sufficiently addresses 12 out of 16 items. Seven of the twelve items, could be improved as they were not addressed as fully as our stated criteria.

Erie County

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Erie County requests this info for elected official, spouse and dependent children. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Erie County requests information on investments that exceed \$1,000, for elected official, spouse and dependent children. (Full credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Erie County requests the address of all real estate for the elected official, and spouse excluding a primary and secondary personal residence. (Half credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Erie County requests information regarding gifts in excess of \$1,000. (Half credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Erie County does not request this information. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Erie County does not request this information. (No credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Erie County does ask for this information. (Full credit)

Money You Owe — List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Erie County asks for information regarding any liability over \$5,000, for elected official and spouse other than a loan from a financial institution or business entity granted on terms made available to the general public. (Full credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Erie County does ask for information owed to the elected official in excess of \$1,000. (Full credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Erie County does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Erie County does not require signers to certify or acknowledge that they have read the ethics code. (No credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Erie County requests information regarding the elected official, spouse, and dependent children. (Half credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Erie County requests information regarding elected official only, for the previous year. (Half credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Erie County requests for in excess of \$1,000. (Half credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Erie County does request. (Full credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Erie County does request. (Full credit)

Total – Out of the 16 items in our criteria, the Erie County Disclosure Form sufficiently addresses 12 out of 16 items. Six of the twelve items, could be improved as they were not addressed as fully as our stated criteria.

Hamburg (Town)

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Hamburg requests this info for elected official, spouse and dependent children. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Hamburg requests this information. (Full credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Hamburg requests this information for elected official, spouse and dependent children. (Half credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded.

(The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Hamburg requests information regarding gifts in excess of \$250. (Half credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Hamburg does not request information regarding campaign contributions. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Hamburg does not request information. (No credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Hamburg does ask for this information. (Full credit)

Money You Owe - List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Hamburg asks for information regarding all debts over \$5,000, for elected official spouse and dependent children. (Full credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Hamburg does not ask for information owed to the elected official. (No credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Hamburg does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Hamburg's form is not certified as to the truthfulness nor are people required to acknowledge that they have read the ethics code. (No credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Hamburg requests information regarding the elected official, spouse and dependent children. (Half credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Hamburg requests information regarding officer positions held by elected official only. (Half credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Hamburg requests. (Full credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Hamburg requests for elected official only. (Half credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Hamburg does request. (Full credit)

Total – Out of the 16 items in our criteria, the Hamburg Disclosure Form sufficiently addresses 11 out of 16 items. Six of the eleven items, could be improved as they were not addressed as fully as our stated criteria.

Buffalo

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Buffalo requests this info for elected official, and spouse. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Buffalo requests this information. (Full credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Buffalo requests this information for elected official and some relatives. (Half credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Buffalo requests information regarding gifts in excess of \$100. (Half credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Buffalo does not request information regarding campaign contributions. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Buffalo does not request this information. (No credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Buffalo does ask for this information. (Full credit)

Money You Owe – List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Buffalo asks for information regarding any liability over \$5,000, other than a loan from a financial institution or business entity granted on terms made available to the general public. Credit card debt does not have to be reported. (Half credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Buffalo does not ask for information owed to the elected official. (No credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Buffalo does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Buffalo's form is not certified as to the truthfulness nor are people required to acknowledge that they have read the ethics code. (No credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Buffalo requests information regarding the elected official, spouse and some relatives. (Half credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Buffalo requests information regarding elected official only. (Half credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Buffalo requests. (Full credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Buffalo does request. (Full credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Buffalo does request. (Full credit)

Total – Out of the 16 items in our criteria, the Buffalo Disclosure Form sufficiently addresses 11 out of 16 items. Six of the eleven items, could be improved as they were not addressed as fully as our stated criteria.

Niagara County

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Niagara County does request this information for elected official, spouse and dependent children. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Niagara County does request this information. (Full credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Niagara County does request this information for elected official, spouse and dependent children. (Half credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Niagara County does request this information for gifts in excess of \$250. (Half credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Niagara County does not request this information. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Niagara County does not request this information. (No credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Niagara County does ask for this information. (Full credit)

Money You Owe – List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Niagara County does ask for information regarding debts. (Full credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Niagara County does not ask for information regarding this. (No credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Niagara County does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Niagara County does not do this. (No credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Niagara County does request this information for elected official, spouse and dependent children only. (Half credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Niagara County request this information for elected official only. (Half credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Niagara County does request this information. (Full credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Niagara County does request this information (Full credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Niagara County does request. (Full credit)

Total – Out of the 16 items in our criteria, the Niagara County Disclosure Form sufficiently addresses 11 out of 16 items. Five out of the eleven items, could be improved as they were not addressed as fully as our stated criteria.

Niagara Falls

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Niagara Falls requests this info for elected official, spouse and dependent children. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Niagara Falls requests this information. (Full credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities.

For residential property, list as the address only the city, town or village where the property is located.

Niagara Falls requests this information for elected official and spouse. A primary or secondary residence does not have to be disclosed. (Half credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Niagara Falls requests information regarding gifts in excess of \$1,000. (Half credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Niagara Falls does not request this information. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Niagara Falls does not request information regarding relatives working for the City of Niagara Falls. (**No credit**)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Niagara Falls does ask for this information. (Full credit)

Money You Owe - List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Niagara Falls asks for information regarding debts over \$5,000, for elected official and spouse. Credit cards of more than \$5,000 are required to be listed. (Full credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Niagara Falls does ask for information owed to the elected official. (Full credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Niagara Falls does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Niagara's form is not certified as to the truthfulness nor are people required to acknowledge that they have read the ethics code. (No credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Niagara Falls does not request this information. (No credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Niagara Falls requests information regarding position held by elected official only for the previous year. (Half credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Niagara Falls requests information but only when in excess of \$1,000. (No credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Niagara Falls requests for elected official only. (Half credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Niagara Falls does request. (Full credit)

Total — Out of the 16 items in our criteria, the Niagara Falls Disclosure Form sufficiently addresses 10 out of 16 items. Five of the ten items, could be improved as they were not addressed as fully as our stated criteria.

Lancaster (Town)

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Lancaster requests this info for elected official and spouse. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Lancaster does not request this information. (No credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Lancaster requests this information for property located in Town of Lancaster only for elected official, spouse and household members. (Half credit)

Gifts — List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Lancaster requests information regarding gifts in excess of \$75, for elected official only. (Half credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Lancaster does not request information regarding campaign contributions. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Lancaster does not request this information. (No credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Lancaster does ask for this information for elected official and spouse. (Full credit)

Money You Owe - List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Lancaster does not ask for information regarding debts. (No credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Lancaster does not ask for information regarding this. (No credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Lancaster does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Lancaster's form is not certified as to the truthfulness nor are people required to acknowledge that they have read the ethics code. (No credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Lancaster does not request this information. (No credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Lancaster does not request this information. (No credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Lancaster does not request this information. (No credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Lancaster does not request this information. (No credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Lancaster does not request. (No credit)

Total – Out of the 16 items in our criteria, the Lancaster Disclosure Form sufficiently addresses 4 out of 16 items. Three of the four items, could be improved as they were not addressed as fully as our stated criteria.

Tonawanda (Town)

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Tonawanda requests this info for elected official and spouse. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Tonawanda does not request this information. (No credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Tonawanda requests this information for elected official, spouse and dependent children for Tonawanda only. (Half credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Tonawanda does not request this information. (No credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Tonawanda does not request information regarding campaign contributions. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Tonawanda does not request this information. (No credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Tonawanda does ask for this information. (Full credit)

Money You Owe - List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Tonawanda does not ask for information regarding debts. (No credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Tonawanda does not ask for information regarding this. (No credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Tonawanda does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Tonawanda's form is not certified as to the truthfulness nor are people required to acknowledge that they have read the ethics code. (No credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Tonawanda does not request this information. (No credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Tonawanda does not request this information. (No credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Tonawanda does not request this information. (No credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Tonawanda does not request this information. (No credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Tonawanda does not request. (No credit)

Total – Out of the 16 items in our criteria, the Tonawanda Disclosure Form sufficiently addresses 3 out of 16 items. Two out of the three items, could be improved as they were not addressed as fully as our stated criteria.

Amherst

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Amherst requests this info for elected official and spouse. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (Half credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Amherst does not request this information. (No credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Amherst requests this information for elected official, spouse and other members of household. (Half credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Amherst does not request this information. (No credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Amherst does not request information regarding campaign contributions. (No credit)

Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Amherst does not request information. (No credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Amherst does not ask for this information. (No credit)

Money You Owe - List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Amherst does not ask for information regarding debts. (No credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Amherst does not ask for information regarding this. (No credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Amherst does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Amherst's form is not certified as to the truthfulness nor are people required to acknowledge that they have read the ethics code. (No credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Amherst does not request this information. (No credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Amherst does not request this information. (No credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Amherst does not request this information. (No credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Amherst does not request this information. (No credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Amherst does not request. (No credit)

Total – Out of the 16 items in our criteria, the Amherst Disclosure Form sufficiently addresses 2 out of 16 items. Both items, could be improved as they were not addressed as fully as our stated criteria.

Clarence

Outside Employers and Businesses where Elected Official, Spouse & Relatives received more than \$1,000 for services performed or goods sold during the year

Clarence does not request this information. The Davies Model Form requires this information from the elected official, spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return. (No credit for this item)

Investments-Name any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000, whichever is less. Provide the same information for your spouse or registered domestic partner and any of your children under age 18.

Clarence does not request this information. (No credit)

Real Estate – List the address of each piece of real estate that you or your relatives listed in Question 1 above, own or rent. List only real estate that is located in the municipality and the contiguous municipalities. For residential property, list as the address only the city, town or village where the property is located.

Clarence does not request this information. (No credit)

Gifts – List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10 or more during the year. Gifts from relatives are excluded. (The amount stated should equal the threshold for prohibited gifts under the municipalities ethics law but not more than \$75.

Clarence does not specifically request this information. (No credit)

Political Contributions – List each person or entity that made to you or your campaign committee, within the previous 24 months, financial contributions, in money, goods, or services, totaling \$1,000 or more to assist in your election. (The amount stated should equal the threshold for a conflict of interest under the municipalities ethics law).

Clarence does not request information regarding campaign contributions. (No credit) Relatives in Service – List each relative defined in question 1, who is an officer or employee of the municipality, whether paid or unpaid, including the relative's name, relationship to you, title and department.

Clarence does not request this information. (No credit)

Volunteer Positions – List each volunteer office or position that you hold. Provide same info for your spouse or registered domestic partner.

Clarence does not ask for this information. (No credit)

Money You Owe - List each person or entity to which you or your spouse or registered domestic partner owes \$10,000 or more. Do not list money owed to relatives. Do not list credit card debt unless you have owed the money for at least 60 days.

Clarence does not ask for information regarding debts. (No credit)

Money Owed to You - List each person or entity that owes you or your spouse or registered domestic partner \$10,000 or more. Do not list money owed by relatives.

Clarence does not ask for information regarding this. (No credit)

Customers and Clients – List the name of each customer or client from whom you or your spouse or registered domestic partner earned \$1,000 or more during the year. Do not disclose the names of medical patients, dental patients, mental health clients, or in the case of lawyers, clients in criminal, bankruptcy, or domestic relations matters.

Clarence does not ask for this information. (No credit)

Is the Disclosure Form certified as to the truthfulness of the information? Are people required to acknowledge that they read their ethics code?

Clarence does this. (Full credit)

Interest in Contracts – Describe any monetary interest and/or connection that you, your spouse, registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers and sisters, have with any contract involving the municipality.

Clarence does request this information for elected official and spouse only. (Half credit)

Political Parties – List any position you your spouse, registered domestic partner, children have held within the past five years in any political party, political committee or political organization.

Clarence does not request this information. (No credit)

Third Party Reimbursements – Identify and describe the source of any third-party payment or reimbursement for municipal travel related expenditures for any matter that relates to your official duties.

Clarence does not request this information. (No credit)

Future Employment – Describe any contract or agreement you, your registered domestic partner, spouse or children has with respect to employment after leaving your government office or position.

Clarence does not request this information. (No credit)

Past Employment – Identify the source and nature of any income in excess of \$1,000/ year from any prior employer, including deferred income, contributions to a pension or retirement fund, profit sharing plan, severance pay or payments under a buyout agreement.

Clarence does not request. (No credit)

Total – Out of the 16 items in our criteria, the Clarence Disclosure Form sufficiently addresses 2 out of 16 items. One item, could be improved as it was not addressed as fully as our stated criteria.

ANNUAL STATEMENT OF FINANCIAL DISCLOSURE TOWN OF TONAWANDA

For Calendar Year **2017**

a.	Title o	of Position:				
		or rosition	· · · · · · · · · · · · · · · · · · ·			
b.	Depar	tment, Agency	y or other Gove	rnmental Agend	ey or Enti	ty
NOT repor		For question ries of amoun	s 3 to 6, do <u>not</u> ts, using the fol	report exact do	llar amou	nts. Instead
Categ	gory A:	Under \$5,00	0	Category D:	\$25,001	to \$50,000
-	gory B:	\$5,001 to \$1	•	Category E:	-	to \$100,000
Categ	gory C:	\$10,001 to \$	25,000	Category F:	Over \$1	00,000
Addr which interes	h you, yo	the SBL No. o	f all real proper your dependent	ty within the To has an ownersh	own of To ip or othe	nawanda in r financial
Na	me of		Real Property	J		Category
Intere	est Holde	<u>er</u>	Address		Number	of Amoun
		1	· · · · · · · · · · · · · · · · · · ·			
	·····					
	v. standb			· · · · · · · · · · · · · · · · · · ·		

Name of	Organizati	ion Title or
Position Holder	and Addre	<u>Position</u>
List the name an	nd address of any partners th you, your spouse, or you	rship, unincorporated association our dependent has a proprietary is
Name of	Organizatio	on Category
Interest Holder	and Addres	
partnership or w	hich you, your spouse, or	ntion (including not-for-profit) or r your dependent is an officer, di of your spouse or dependent, if ar
listing your posit		
listing your posit	Person's	Name and Address of Corpo

your spouse, or you	nddress of any corporation or lim or dependent legally or beneficial the issued and outstanding stock	lly owns or controls more than
Name of Owner	Corporation or <u>Partnership</u>	Category of Amount
State the self-emplo	yment, and the general nature th	pereof, from which you or you
\$2,000.00 .	during the previous calendar yea	r, gross income in excess of
If you are unable, af required herein, so s	ter reasonable effort, to obtain so tate and give reasons therefore.	ome or all of the information
		,
Month/ Day/Year	Signatur	re of Reporting Individual

ANNUAL STATEMENT OF FINANCIAL DISCLOSURE FOR CITY OF NIAGARA FALLS FOR 2017

1.	Name	
2.	(a)	Title of Position
	(b)	Department, Agency or other Government Entity
	(c)	Address of Present Office
	(d)	Office Telephone Number
3.		(a) Marital Status If married, please give spouse's full name, including maiden name where applicable
	(b)	List the names of all unemancipated children
	•	
unles pages	s another	r each of the following questions completely, with respect to the calendar year 2017, period or date is otherwise specified. If additional space is needed, attach additional
	Whene	ever a "value" or "amount" is required to be reported herein, such value or amount
shall	be reporte	ed as being within one of the following categories:
		Category A - under \$5,000;
		Category B - \$5,000 to under \$20,000;
		Category C - \$20,000 to under \$60,000;
		Category D - \$60,000 to under \$100,000;
		Category F \$100,000 to under \$250,000; and

Category F - \$250,000 and over.

Page 2

A reporting individual shall indicate the Category by letter only.

For the purposes of this statement, anywhere the term "local agency" shall appear such term shall mean a local agency of the City of Niagara Falls as defined in Section 810 of the General Municipal Law.

4. (a) List any office, trusteeship, directorship, partnership, or position of any nature, including honorary positions, if known, and excluding membership positions, whether compensated or not, held by the reporting individual with any firm, corporation, association, partnership, or other organization other than the State of New York or the City of Niagara Falls. If said entity was licensed by any state or local agency, was regulated by any state regulatory agency or local agency, or, as a regular and significant part of the business or activity of said entity, did business with, or had matters other than ministerial matters before, any state or local agency, list the name of any such agency.

Position	Organization	State or Local Agency

(b) List any office, trusteeship, directorship, partnership, or position of any nature including honorary positions, if known, and excluding membership positions, whether compensated or not, held by the spouse or unemancipated child of the reporting individual, with any firm, corporation, association, partnership, or other organization other than the State of New York. If said entity was licensed by any state or local agency, was regulated by any state regulatory agency or local agency, or, as a regular and significant part of the business or activity of said entity, did business with, or had matters other than ministerial matters before any state or local agency, list the name of any such agency.

Position	Organization	State of Local Agency

Page 3

5. (a) List the name, address and description of any occupation, employment, trade, business or profession engaged in by the reporting individual. If such activity was licensed by any state or local agency, was regulated by any state regulatory agency or local agency, or, as a regular and significant part of the business or activity of said entity, did business with or had matters other than ministerial matters before any state or local agency, list the name of any such agency.

Position	Name & Address of Organization	Description	State or Local Agency

(b) If the spouse or unemancipated child of the reporting individual was engaged in any occupation, employment, trade, business or profession, which activity was licensed by any state or local agency, was regulated by any state regulatory agency or local agency, or, as a regular and significant part of the business or activity of said entity, did business with or had matters other than ministerial matters before any state or local agency, list the name, address and description of such occupation, employment, trade, business or profession and the name of any such agency.

Position	Name & Address of Organization	Description	State or Local Agency
		·	

6. List any interest, in excess of \$1,000, excluding bonds and notes, held by the reporting individual, such individual's spouse or unemancipated child, or partnership of which any such person is a member, or corporation, ten per centum or more of the stock of which is owned or controlled by any such person, whether vested or contingent, in any contract made or executed by a state or local agency and include the name of the entity which holds such interest and the relationship of the reporting individual or such individual's spouse or such child to such entity and the interest in such contract. Do not list any interest in any such contract on which final payment has been made and all obligations under the contract except for guarantees and warranties have been performed, provided,

Page 4

however, that such an interest must be listed if there has been an ongoing dispute during the calendar year for which this statement is filed with respect to any such guarantees or warranties. Do not list any interest in a contract made or executed by a state agency after public notice and pursuant to a process for competitive bidding or a process for competitive requests for proposals.

Self, Spouse or Child	Entity Which Held Interest in Contract	Relationship to Entity & Interest in Contract	Contracting State or Local Agency	Category of Value of Contract
		:		
party committee, or as a poli	reporting individual held as itical party district leader. The ns any party or independent endent body.	e term "party" shall have the	same meaning as "party" in	the Election Law. The term
profession licensed by the I individual. Additionally, if s	ng individual practices law, in properties of Education, give uch an individual practices with a labert areas of matters until the subject areas of matters are subject areas of matters are subject are subject areas of matters are subject are s	e a general description of the that firm or corporation and is	ne principal subject areas of sa partner or shareholder of the	matters undertaken by such he firm or corporation, give a

Financial	Disclosure	Form
Page 5		

11.

		:			
tatement is filed by the rep	gifts, excluding campaign coorting individual or such in and address of the donor. of each such gift.	dividual's spous	se or unemand	ipated child from the same	donor, excluding gifts fron
Self, Spouse or Child	Name of Donor	Address Nature of Gift		Category of Value of Gift	
onnection with official dutie ource. For purposes of this or activities related to the r	describe the source of any reserved by the political item, the term "reimburseme reporting individual's official actude gifts reported under Item.	l subdivision for ents" shall mear duties such as	r which this standard any travel-rel	atement has been filed, in exacted expenses provided by r	cess of \$1,000 from each su non-governmental sources a
onnection with official dutie ource. For purposes of this or activities related to the r	es reimbursed by the politica item, the term "reimbursemore reporting individual's official	l subdivision for ents" shall mear duties such as	r which this standard any travel-rel	atement has been filed, in exacted expenses provided by r	cess of \$1,000 from each su non-governmental sources a
onnection with official dutie ource. For purposes of this or activities related to the r	es reimbursed by the political item, the term "reimburseme reporting individual's official include gifts reported under Item	l subdivision for ents" shall mear duties such as	r which this standard any travel-rel	atement has been filed, in extated expenses provided by ragements, conferences, or f	cess of \$1,000 from each su non-governmental sources a

Financia	l Disclo	sure Form
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P	age	6

plans other than retirement plans of the State of New York or the City of New York, and deferred compensation plans established in accordance with the Internal Revenue Code, in which the reporting individual held a beneficial interest in excess of \$1,000 at any time during the preceding year. Do not report interests in a trust, estate or other beneficial interest established by or for, or the estate of, a relative.

Identity	Category of Value*1
12. (a) Describe the terms of, and the parties to, any contract, promise, or other agreement be person, firm, or corporation with respect to the employment of such individual after leaving office or positive.	
(b) Describe the parties to and the terms of any agreement providing for continuation of andividual in excess of \$1,000 from a prior employer other than the City. (This includes interests in one sharing plan, or life or health insurance; buy-out agreements; severance agreements, etc.)	

¹ The value of such interest shall be reported only if reasonably ascertainable.

Page 7

individual's spouse for the taxable year last occurring prior to the date of filing. Nature of income includes, but is not limited to, salary for government employment, income from other compensated employment, whether public or private, directorships and other fiduciary positions, contractual arrangements, teaching income, partnerships, honorariums, lecture fees, consultant fees, bank and bond interest, dividends, income derived from a trust, real estate rents, and recognized gains from the sale or exchange of real or other property. Income from a business or profession and real estate rents shall be reported with the source identified by the building address in the case of real estate rents and other wise by the name of the entity and not by the name of the individual customers, clients or tenants, with the aggregate net income before taxes for each building address or entity. The receipt of maintenance received in connection with a matrimonial action, alimony and child support payments shall not be listed.

Self/Spouse	Source	Nature	Category of Amount
	·		

14. List the sources of any deferred income in excess of \$1,000 from each source to be paid to the reporting individual following the close of the calendar year of which this disclosure statement is filed, other than deferred compensation reported in Item 11 hereinabove. Deferred income derived from the practice of a profession shall be listed in the aggregate and shall identify as the source the name of the firm, corporation, partnership or association through which the income was derived, but shall not identify individual clients.

Source	Category of Amount

Page 8

15. List each assignment of income in excess of \$1,000, and each transfer other than to a relative during the reporting period for which this statement is filed for less than fair consideration of an interest in a trust, estate or other beneficial interest, securities or real property, by the reporting individual, in excess of \$1,000, which would otherwise be required to be reported herein and is nor has not been so reported.

Item Assigned or Transferred	Assigned or Transferred to	Category of Amount

16. List below the type and market value of securities held by the reporting individual or such individual's spouse from each issuing entity in excess of \$1,000 at the close of the taxable year last occurring prior to the date of filing, including the name of the issuing entity exclusive of securities held by the reporting individual issued by a professional corporation. Whenever an interest in securities exists through a beneficial interest in a trust, the securities held in such trust shall be listed only if the reporting individual has knowledge thereof except where the reporting individual or the reporting individual's spouse has transferred assets to such trust for his or her benefit in which event such securities shall be listed unless they are not ascertainable by the reporting individual because the trustee is under an obligation or has been instructed in writing not to disclose the contents of the trust to the reporting individual. Securities of which the reporting individual or the reporting individual's spouse has no beneficial interest shall not be listed. Indicate percentage of ownership if the reporting person or the reporting person's spouse holds more than five percent of the stock of a corporation in which the stock is publicly traded or more than ten percent if such stock is not publicly traded. Also list securities owned for investment purposes by a corporation more than fifty percent of the stock of which is owned or controlled by the reporting individual or such individual's spouse. For the purposes of this item, the term "securities" shall mean bonds, mortgages, notes, obligations, warrants and stocks of any class, investment interests in limited or general partnerships and certificates of deposit and such other evidences of indebtedness and certificates of interest as are usually referred to as securities. The market value for such securities shall be reported only if reasonably

Page 9

ascertainable and shall not be reported if the security is an interest in a general partnership that was listed in Item 8(a) or if the security is corporate stock, not publicly traded, in a trade or business of a reporting individual or a reporting individual's spouse.

Self/Spouse	Issuing Entity	Type of Security	Category of Market Value as of the close of the taxable year last occurring prior to the filing of this statement	Percentage of Corporate Stock Owned or Controlled

17. List below the location, size, general nature, acquisition date, market value and percentage of ownership of any real property in which any vested or contingent interest in excess of \$1,000 is held by the reporting individual or the reporting individual's spouse. Also list real property owned for investment purposes by a corporation more than fifty percent of the stock of which is owned or controlled by the reporting individual or such individual's spouse. Do not list any real property which is the primary or secondary personal residence of the reporting individual or the reporting individual's spouse, except where there is a co-owner who is other than a relative.

Self/Spouse/Other Party	Location	Size	General Nature	Acquisition Date	Category of Market Value
	•				

18. List below all notes and accounts receivable, other than from goods or services sold, held by the reporting individual at the close of the taxable year last occurring prior to the date of filing and other debts owed to such individual at the close of the table year last occurring prior to the date of filing, in excess of \$1,000, including the name of the debtor, type of obligation, date due and the nature of the collateral securing payment of each, if any, excluding securities reported in Item 16 hereinabove. Debts, notes and accounts receivable owned to the individual by a relative shall not be reported.

Type of Obligation, Date Due and Nature of Collateral, if any	Category of Amount
	Type of Obligation, Date Due and Nature of Collateral, if any

19. List below all liabilities of the reporting individual and such individual's spouse in excess of \$5,000 as of the date of filing of this statement, other than liabilities to a relative. Do not list liabilities incurred by, or guarantees made by, the reporting individual or such individual's spouse or by any proprietorship, partnership, or corporation in which the reporting individual or such individual's spouse has an interest, when incurred or made in the ordinary course of the trade, business or professional practice of the reporting individual or such individual's spouse. Include the name of the creditor and any collateral pledged by such individual to secure payment of any such liability. A reporting individual shall not list any obligation to pay maintenance in connection with a matrimonial action, alimony or child support payments. Revolving charge account information shall only be set forth if liability thereon is in excess of \$5,000 at the time of filing. Any loan issued in the ordinary course of business by a financial institution to finance educational costs, the cost of home purchase or improvements for a primary or secondary residence, or purchase of a personally owned motor vehicle, household furniture or appliances, shall be excluded. If any such reportable liability has been guaranteed by any third person, list the liability and name the guarantor.

Name of Creditor or Guarantor	Type of Liability and Collateral, if any	Category of Amount

The requirements of law relating to the reporting of financial interests are in the public interest and no adverse inference of unethical or illegal conduct or behavior will be drawn merely from compliance with these requirements.

Signature of Reporting Individual	Date (month/day/year)
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NIAGARA COUNTY ANNUAL FINANCIAL DISCLOSURE FORM - 2017 Name and Address

First Name	Middle Nam	ne Last Name
Department/A	gency or Committee	Title
Department A	ddress	Phone
Residence Ad	dress	Phone
Spouse Provide the na children:	e and Dependent Child me of your spouse (if ma	ren arried) and names of any dependent
-	Spouse	Child/Age
ō	Child/Age	Child/Age
2. Financ i dollar a followin	mounts. Instead, report	uestions 3 to 6, do not report the exact Categories of Amounts using the
C	ategory A: Under \$5,00 ategory B: \$5,001-10,0 ategory C: \$10,001-25	000 Category E: \$50,001-100,000
partners organiza and indi	ship or other position in a ation held by you and yo	office, trusteeship, directorship, any business, propriety or not-for-profit ur spouse and dependent children, if any, nesses are involved with the County of
Name of Fa Membe	,	nization County Department or Agency and Nature of Involvement

Name of Family	Position Na	ame, Address	State or Lo	ocal Categor
Member	E	Description of Organization	Agency	
c. Future Emplo agreement bet employment af	ween you and	l anyone else v	vith respect t	or other to your
MANAGEMENT OF THE PROPERTY OF				
d. Past Employmexcess of \$1,00 income, contribution pay or payment	00 per year fro outions to pens	om any prior en sion or retireme	nployer incluent fund, prof	ding deferred
excess of \$1,00 income, contrib	00 per year frontions to pensions to pensions to buy of the control of the contro	om any prior en sion or retireme	nployer inclu nt fund, prof t. me Ca	ding deferred
excess of \$1,00 income, contrib pay or payment	of per year from the putions to pensits under a buy of Des (i.e., and the putions, pand dependent ounty or within	lescribe all investing to complete all investing the complete all investing the control of the c	estments in e partnership al or other in t.	excess of \$5,0 or other assettion of all realisch you, your

interest in any a retirement plans	each interest in a tru ssets in excess of \$2, or interest in an esta d dependent children.	000 except form IR	RS eligible
Name of Family Member	Trustee/Executor	Description of Trust/Estate	Category of Amount
excess of \$1,00 including teaching	Identify the source a 0 per year from any o ng income, lecture fee of any nature for you	ther source not des es, consultant for co	scribed above,, ontractual income
Name of Family Member	Name/Address of Source	Nature of Incom	e Category of Amount
0:6	. •		
last year by you, relatives. The te payments to thin	gifts aggregating in e your spouse or depe erm "gifts" includes gift d parties on your beha ayments that are not r	ndent children, exc ts of cash, property alf, forgiveness of d eportable as incom	luding gifts from , personal items, lebt, honorariums
List source of all last year by you, relatives. The te payments to thin and any other payment of Family Third Party Rei Identify and description official dutie expenses provid	gifts aggregating in e your spouse or depe erm "gifts" includes gift d parties on your beha ayments that are not r Member Name/Add	ndent children, exc its of cash, property alf, forgiveness of d eportable as income ress of Donor Ca y third party reimbur of \$250 for any mater sement" includes a nan the County for s	luding gifts from the personal items, lebt, honorariums le. Integory of Amount lirsement for ter that relates to any travel related speaking

5.	Debts. Describe all debts of you, your spouse and dependent children in excess of \$5,000.								
	Name of Family Member	Name/Address Creditor	Category of Amount						
6.	Interest in Contracts. Describe any interest of your contract involve County of	ou, your spouse or depend any municipality located w	ent children in any ithin Niagara County.						
-	Name of Family Member	Contra	act Description						
8.	Political Parties. List any position you held we political party, political com "political organization" includes affiliated with, or a subsidered	mittee or political organiza ides any independent or a	tion. The term						
	Signed		Date						

PLEASE COMPLETE AND SIGN THE FACE OF THE ENCLOSED ENVELOPE

RETURN TO:

NIAGARA COUNTY BOARD OF ETHICS

c/o Human Resources Office 111 Main Street, Suite G2 Lockport, New York 14094

ANNUAL STATEMENT OF FINANCIAL DISCLOSURE TOWN OF LANCASTER

PLEASE ANSWER ALL QUESTIONS. Disclosure forms will not be accepted unless fully completed.

For Calendar Year 2018

	Name:
	Address:
	Phone Number:
	Title of Town Position:
•	Department, Agency, or other Governmental Agency or Entity:
	Address and SBL No. of all real property within the Town of Lancaster in which you or your spous or other family member of your household has an ownership or other financial interest. <i>Please</i>
	indicate each S.B.L. listed on the form as a primary residence, a business property and/or rental property.
	property.
	Address & S.B.L. Number
	property.
	Address & S.B.L. Number Primary:

5.	List the name and address of any corporation or limited partnership of which you or yo spouse is an officer, director or employee or of which you or your spouse legally or beneficially owns or controls more than <i>five percent (5%) of the issued and outstanding stock or other ownership rights</i> , listing your position and/or your spouse's position, if a with the corporation or limited partnership. <i>If none, please state not applicable (NA)</i> .								
	Name of Corporation Address or Limited Partnership								
6.	State the self-employment and the general nature thereof, from which you or your spouse has derived, during the previous calendar year, gross income in excess of \$2,000.00. <i>If none, please state not applicable (NA)</i> .								
7.	If you are unable after reasonable effort to obtain some or all of the information required herein, so state and give reasons therefore. <i>If none, please state not applicable (NA)</i> .								
8.	Have you personally accepted any gifts or donations with a value of \$75 or more? List donators and dollar amount: (If none, please state not applicable, NA).								
Signa	ature of Reporting Individual								
Date									

ANNUAL STATEMENT OF FINANCIAL DISCLOSURE FOR

TOWN OF HAMBURG

FOR	20	

1. Name and Add	iress.		*	
Last Name	Middle Ini	tial	Fi	rst Name
Title		,		
	š			
Department or Agency	7			
	, s	× =		
Department or Agenc	y Address			Telephone No.
Residence Address				Telephone No.
2. Spouse and	Children			
Provide the of any dependent	name of your spou children:	ise (if ma	arried) and	I the names
	•			
Sp	ouse		Child/Age	
	· •			
Chil	.d/Age		Child/Age	
	tions 3 to 6, do no categories of amo			
	,001 to \$10,000	Category		

2	wad my	annial	Tnt	erests.

other position in any business, association, proprietary, or not-for-profit organization held by you and your spouse and dependent children, if any, and indicate whether these businesses are involved with the Town in any manner.

Position	Organization	Nature of Involvement
s.		

b. Outside Employment. Describe any outside occupation, employment, trade, business, or profession providing more than \$1,000/year for you and your spouse and dependent children, if any, and indicate whether such activities are regulated by any State or local agency.

Name of Family Member	Position	Name, Address, Descrip- tion of Organization	State or Local Agency

C.	Future	Employme	rit.	Desc	cribe	any	contract	t, promi	se or	other	agreer	nent	between	you	and
anyone e	lse with	respect	to	your	empl	oymen	t after	leaving	your	Town	office	or	position.		
						TOTAL CONTRACTOR OF THE									

CATEGORIES OF MOUNT WILL REMAIN CONFIDENTIAL

	egory
OL	Amount
NAME OF TAXABLE PARTY.	
A CONTRACTOR OF THE PARTY OF TH	

Finar	cial	Disclosure	Form
Page	3		

	Financial Disclosure Form Page 3	*		
	d. <u>Past Employment</u> . Id year from any prior employer, ment fund, profit sharing pla	entify the source including deferre n, severance pay,	or payments under	income in excess of \$1,000 per utions to a pension or retire- a buy-out agreement.
	Name and Address of Inco		Description of I deferred, etc.)	ncome (i.e., pension,
	Name and Address of Thee			
	interest, regardless of its v Name of Family Member	Name and Addr Business or F	ress of Real Estate	Description of Investment
*				
	f. Trusts. Identify ea any assets in excess of \$2,00 estate or trust of a relative	ch interest in a t 0, except for IRS , for you and your	rust or estate or eligible retirems spouse and deper	
	Name of Family Member	Trustee/Ex	recutor	Description of Trust/Estate
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	Category of Amount
	Category of Amount

Financial	Disclosure	Form
Page 4		

g. Other Income. Identify the source and nature of any other income in excess of \$1,000/year from any source not described above, including teaching income, lecture fees, consultant fees, contractual income, or other income of any nature, for you and your spouse and your dependent children, if any.

Name of Family Member	Name and Address of Inco		of Income
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4. Gifts and Honorariums.

List the source of all gifts aggregating in excess of \$250.00 received during the last year by you, your spouse or dependent child, excluding gifts from a relative. The term "gifts" includes gifts of cash, property, personal items, payments to third parties on your behalf, forgiveness of debt, honorariums, and any other payments that are not reportable as income.

Name of Family Member	Name and Address of Donor
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Financial	Disclosure	Form
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5.	Third-	Party	Reimb	ursements	
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Identify and describe the source of any third-party reimbursement for travel-related expenditures in excess of \$250.00 for any matter that relates to your official duties. The term "reimbursement" includes any travel-related expenses provided by anyone other than the Town for speaking engagements, conferences, or fact-finding events that relate to your official duties.

Source	Description
- Annual	
,	
6. Debts.	
Describe all debts of you, your spouse, and	dependent children in excess of \$5,000.
Name of Family Member	Name and Address of Creditor

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Financial Disclosure Form . Page 6	
7. Interest in contracts. Describe any interest of you, your spouse, o volving the Town or any municipality located with	or your dependent children in any contract in- nin the County.
	, and the constant of the cons
8. Political Parties. List any position you held within the last for any political party, political committee, or position "political organization" includes any independent of that is affiliated with or a subsidiary of	olitical organization. The ndent body or any organi
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Category of Amount

Signature	decora	* .	Date	-

COUNTY OF ERIE EMPLOYEE DISCLOSURE FORM

File this form with your department head. Every section must be filled out. If you have no employment or interest to disclose, write "NOT APPLICABLE" in the first line of that section.

NAME:POSITION:	
POSITION:	
DEPARTMENT:	
WORK: ADDRESS:	
HOME ADDRESS:	
WORK TELEPHONE:	HOME TELEPHONE:
1. State every employment for pay wi	hich you hold, whether full time or part time, other than you
employment with the County of Erie:	
EMPLOYER:	
EMPLOYER: ADDRESS: TELEPHONE: YOUR POSITION:	
TELEPHONE:	
YOUR POSITION:YOUR USUAL WORK HOURS:	P
YOUR USUAL WORK HOURS:	
2. State the name of any firm or partr	tership of which you are a member
	result of which you are a member.
BUSINESS NAME:	
BUSINESS NAME:	
TELEPHONE:	
NATURE OF BUSINESS:	
USUAL HOURS OF WORK:	
3 State any self employment or busin	ness of which you own or operate personally:
BUSINESS NAME:ADDRESS: TELEPHONE:NATURE OF BUSINESS:	
ADDRESS:	
TELEPHONE:	
NATURE OF BUSINESS.	
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4. State the Name of corporation in w	4.5.6
	hich you, your spouse or your minor children hold five per
cent or more of the stock::	
CORPORATE NAME:	
ADDRESS:	
TELEPHONE:	
NATURE OF BUSINESS:	
YOUR POSITION WITH CORPORATION:	

I file this statement pursuant to Section 8 of the Erie County Code of Ethics. Any false statement or failure to provide required information shall be punishable under the laws prohibiting filing of a false statement.
Statement.
Date:Signature
Such disclosure form shall be filed with the Erie County Department of Personnel, and shall be held in the permanent personnel record of the employee or officer. Such record shall be made available to the Erie County Board of Ethics at any time, upon request of the board.
b. The following form of financial disclosure shall be filed annually by every elected official officer or employee; political party official; and candidate for elected office, as those terms are defined in section three of this local law, and such disclosure shall be filed regardless of whether such individual is employed, a member of a board or commission, or otherwise affiliated with the county at the time th request for disclosure is made; however, the Erie County Board of Ethics shall annually review the form and may, in their sole discretion, modify the same as they deem necessary:
ANNUAL STATEMENT OF FINANCIAL DISCLSOURE County of Erie
For Calendar Year
Tor Calcifel Teat
1. Name
2. (a) Title of Position -
(b) Department, Agency or other Governmental Entity –
(c) Address of Present Office -
(d) Office Telephone Number -
3. (a) Marital Status If married, please give spouse's
full name including maiden name where applicable.
(b) List the names of all unemancipated children
Answer each of the following questions completely, with respect to calendar year, unless another period or date is otherwise specified. If additional space is needed, attach additional pages.
Whenever a "value" or "amount" is required to be reported herein, such value or amount shall be reported as being within one of the following categories: Category A - under \$20,000; Category B - \$20,000 to under \$50,000, Category C - \$50,000 to under \$100,000; Category D - \$100,000 to under \$250,000; Category E - \$250,000 to under \$500,000; and Category F - \$500,000 or over. A reporting

individual shall indicate the category by letter only.

term shall mean a local agency, as defined in section eight hundred ten of the General Municipal Law of the political subdivision for which this financial statement disclosure statement has been filed. (a) List any office, trusteeship, directorship, partnership, or position of any nature including honorary positions, if known, and excluding membership positions, whether compensated or not, held by the reporting individual with any firm, corporation, association, partnership, or other organization other than the County of Erie. If said entity was licensed by any state or local agency, was regulated by any state regulatory agency or local agency, or, as a regular and significant part of the business or activity of said entity, did business with, or had matters other than ministerial matter before, any state or local agency, list the name of the agency. State or Local Agency **Position** Organization (b) List any office, trusteeship, directorship, partnership, or position of any nature including. honorary positions, if known, and excluding membership positions, whether compensated or not, held by the spouse or unemancipated child of the reporting individual, with any firm, corporation, association, partnership, or other organization other than the State of New York. If said entity was licensed by any state or local agency, was regulated by any state regulatory agency or local agency, or, as a regular and significant part of the business or activity of said entity, did business with, or had matters other than ministerial matter before, any state or local agency, list the name of the agency. **Position** Organization (a) List the name, address and description of any occupation, employment, trade, business profession engaged in by the reporting individual. If such activity was licensed by any state or local agency, was regulated by any state regulatory agency or local agency, or, as a regular and significant part of the business or activity of said entity, did business with, or had matters other than ministerial matters before, any state or local agency, list the name of such agency. State or Local Agency Description Name and Address of Organization

For the purpose of this of this statement, anywhere the term "local agency" shall appear such

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7. List any position the reporting individual held as an officer of any political party or political organization, as a member of any political party committee, or as a political party town or zone leader. The term "party" shall have the same meaning as "party" in the election law. The term "political" organization" means any party or independent body as defined in the election law or any organization that is affiliated with or a subsidiary of a party of independent body.

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reporting individual following the close of the calendar year for which this disclosure statement is filed, other than deferred compensation reported in item 11 hereinabove. Deferred income derived from the practice of a profession shall be in the aggregate and shall identify as the source, the name of the firm, corporation, partnership or association through which the income was derived, but shall not identify individual clients.

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List below the type and market value of securities held by the reporting individual or such individual's spouse from each issuing entity in excess of \$1,000 at the close of the taxable year last occurring prior to the date of filing, including the name of the issuing entity exclusive of securities held by the reporting individual issued by a professional corporation. Whenever an interest in securities exists through a beneficial interest in a trust, the securities held in such trust shall be listed only if the reporting individual has knowledge thereof except where the reporting individual or the reporting individual's spouse has transferred assets to such trust for his or her benefit in which event such securities shall be listed unless they are not ascertainable by the reporting individual because the trustee is under an obligation or has been instructed in writing not to disclose the contents of the trust of the reporting individual. Securities of which the reporting individual or the reporting individual's spouse is the owner of record but in which such individual or the reporting individual's spouse has no beneficial interest shall not be listed. Indicate percentage of ownership if the reporting person or the reporting person's spouse holds more than five percent of the stock of a corporation in which the stock is publicly traded or more than ten percent of the stick if a corporation in which the stock is not publicly traded. Also list securities owned for investment purposes by a corporation more than fifty percent of the stock of which is owned or controlled by the reporting individual or individual's spouse. For the purpose of this item the term "securities" shall mean bonds, mortgages, notes, obligations, warrants and stock of any class, investment interests ion limited or general partnerships and certificates of deposits and such other evidences of indebtedness and certificates if interest as are usually referred to as securities. The market value for such securities shall be reported only if reasonably ascertainable and shall not be reported if the security is an interest in a general partnership that was listed in item 8 (a) or if security is corporate stock, not publicly traded, in a trade-or business of a reporting individual or ϵ reporting individual's spouse.

Self/ Issuing Entity 16. List below the ownership of any real the reporting individu	Security location, size, gen		year last for to the	of Corporate stock owned or controlled
ipouse Entity 16. List below the ownership of any real	Security location, size, gen	occurring po	rior to the	owned or
pouse Entity 16. List below the ownership of any real	Security location, size, gen	filing of this	,	
.6. List below the	e location, size, gen		statement	controlled
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wnership of any real		and makeura anni-lak	•	
	esidence of the rep	orting individual or		hich is the primary or idual's spouse, except
ielf/				
pouse		* *	Categ	ory Percentage
ther		General Acc	ulsition of Ma	rket of
arty Locat	tion Size	<u>Nature</u>	Date Valu	ue Ownership
* #	1.			
	1	· · · · · · · · · · · · · · · · · · ·		

18. List below all liabilities of the reporting individual and such individual's spouse, in excess of \$5,000 as of the date of filing of this statement, other than liabilities to a relative. Do not list liabilities incurred by, or guarantees made by, the reporting individual or such individual's spouse or by any proprietorship, partnership or corporation in which the reporting individual or individual's spouse has an interest, when incurred or made on the ordinary course of the trade, business or professional practice of the reporting individual or such individual's spouse. Include the name of the creditor and any collateral pledged by such individual to secure payment of any such liability. A reporting individual shall not list any obligation to pay maintenance in connection with a matrimonial action; alimony or child support payments. Revolving charge account information shall only be set forth if liability thereon is in excess of \$5,000 at the time of filing. Any loan issued in the ordinary course of business by a financial institution to finance educational costs, the cost of home purchase or improvements for a primary or secondary residence, or purchase of a personally owned motor vehicle, household furniture or appliances shall be excluded. If any such reportable liability has been guaranteed by any third person, list the liability and name the guarantor.

Name of Creditor of Guarantor		e of Liability & ateral, if any		Catego Amo	•	
		. :		ty v		
	1					. '
The requirement and no adverse inference compliance with these	ce of unethic	al or illegal co	porting of fina nduct or beha	ncial interests vior will be dra	are in the pu wn merely fo	blic intere
Signature of Reporting		•	Date (n	nonth/day/yea	r)	

Any elected official or candidate for elected office who, either as an individual or as a member or employee of a private entity, organization or for-profit professional association of any kind, that is hired by a third party individual, association, organization, corporation or other entity to provide any type of service, and regardless of whether the elected official or candidate for elected office performs any services for said third party, the elected official or candidate for elected office is required to disclose the identity of that third party to the Erie County Attorney's Office and the Erie County Board of Ethics within five days of the hiring or retention if that third party is seeking any action, determination, ruling or lack of action from any department, administrative unit, or other board of the county, whether or not the elected official or candidate for elected office has personally provided the service to the third party. Such disclosure shall be required irrespective of the service being provided to the third party by the elected official, or candidate for elected office, or their private entity, organization or for-profit professional association. Within seven days of any then currently elected official being hired in a position of employment by any private entity, organization or individual, in whatever form, the elected official must disclose the hiring to the Erie County Board of Ethics and Erie County Attorney's Office. The Erie County Board of Ethics shall, within thirty days of receiving notice of such disclosure, review the details of the compensation and the services or products rendered for such compensation and determine that there is no prohibition in this Code of Ethics for the receipt of said compensation or

MODEL ANNUAL DISCLOSURE FORM

[COUNTY, CITY, TOWN, VILLAGE, OR OTHER MUNICIPALITY] OF

ANNUAL DISCLOSURE STATEMENT FOR CALENDAR YEAR ____

Last Name	First Name	Initial
	•	
Title	Departme	nt or Agency
Work Address	Work Pho	one No.
If the answer to any of the	following questions is "none," pleas	se so state. Attach additional
pages if necessary.		•

1. **Outside Employers and Businesses.** List the name of every employer or business, other than the [municipality], from which you received more than \$1,000 for services performed or for goods sold or produced during the year [previous calendar year].¹ Do not list individual customers or clients of the business.² Do not list businesses in which you were an investor only

¹ See sections 101(1)(a), (d), (e), (f), 109(3)(b).

² If the municipality determines to require disclosure of major customers and clients of elected officials and compensated policymakers, as discussed above, then the following should be added at the end of this sentence: "(they are listed in Question 10 below)."

(they are listed in Question 2 below). Identify the nature of the business and the type of business, such as a partnership, corporation, or sole proprietorship, and list your relationship(s) to the employer or business (i.e., owner, partner, officer, director, member, employee, and/or shareholder). Provide the same information for your relatives. "Relative" includes your spouse or registered domestic partner, children, grandchildren, parents, sisters, brothers, and grandparents; the parents, children, sisters, and brothers of your spouse or registered domestic partner; the spouses or registered domestic partners of your parents, children, brothers, and sisters; and any person claimed as a dependent on your latest individual state income tax return.³ Name of Family Relationship Name of Employer Nature of Relationship Type of Member to You or Business Business Business to Business [E.g.: John Smith Self **TechIM** Computers Corp. Pres. & S/H7 [E.g.: Rose Smith Wife Monument Realty Real Estate Partnership Employee]

2. **Investments.** List the name of any entity in which you have an investment of at least 5% of the stock or debt of the entity or \$10,000,⁴ whichever is less. Do not list any entity listed in

³ "Relative" should be defined to include only those relatives whom, under the ethics code, an official may not take an action to benefit. See sections 100(13), 101(1)(b), 101(1)(c).

⁴ The amount should equal the threshold for a conflict of interest under the municipal ethics law. For example if an official does not violate the ethics law by acting to benefit a company in which he or she has an investment of less than \$10,000 or 5%, then disclosure of that interest

response to Question 1 above. Identify the nature of the business and the type of business entity, if any (e.g., corporation). Provide the same information for your spouse or registered domestic partner and any of your children who are under age 18.

Name of Family	Relationship	Name of	Nature of	Type of
Member	to You	Entity	Business	Business
[E.g.: John Smith	Self	Verizon	Communications	Corp.]

3. **Real Estate**. List the address of each piece of real estate that you or your relatives, as defined in Question 1, own, lease, or rent, in whole or in part. List only real estate that is located in the [municipality] and the [contiguous municipalities]. For residential property, list as the address only the city or village (or, if none, the town) in which the property is located.⁵

Name	of	Family
TA COTTING	UL	T, STHEFFE

Address of Real

Type of

	Member	Relationship to	You Estate	Interest
[E.g.:	Robert Smith	Father	2 Main St., Teatown	Hold mortgage]

should not be required. See sections 100(9), 101(1)(d), (e), (f), 109(3)(b).

⁵ See sections 101(1)(a), (b), (c), 109(3)(a).

4. Gifts. List each gift that you or your spouse or registered domestic partner or child under the age of 18 and living with you received worth \$10⁶ or more during the year [previous calendar year], except gifts from relatives, as defined in Question 1. A "gift" means anything sought or received for less than fair market value, whether in the form of money, a service, a loan, travel, lodging, meals, refreshments, entertainment, discount, forbearance, promise, or tickets, or in any other form. Separate gifts from the same or affiliated donors during the year must be added together for purposes of the \$10 rule. You do not need to list a gift if you know that the donor has had no contracts with, non-ministerial licenses or permits from, funding from, or litigation against the [municipality] during the previous 24 months.

Relationship

Recipient of Gift	Donor of Gift	to Donor	Nature of Gift
[E.g.: John Smith	Acme Corp.	Former employer	Free trip to Las Vegas]
REAL SCALE OF THE			
West and the second			

5. Political Contributions. List each person or entity that made to you or your campaign

The amount should equal the threshold for prohibited gifts under the municipal ethics law but not more than \$75. See sections 100(5), 101(4), 109(3)(c); Gen. Mun. Law § 805-a(1)(a).

committee, within the	previous 24 months, fina	ncial contributions, in m	oney, goods, or
services, totaling \$1,00	00 ⁷ or more to assist in yo	our election to public off	ice.
Name of Contributor			-
[E.g.: Alfred Jone	s]		
6. Relatives in [Muni	cipality's] Service. List	each relative, as defined	l in Question 1, who
is an officer or employ	ee of the [municipality],	whether paid or unpaid,	including the
relative's name, relatio	nship to you, title, and d	epartment.8	
Name of Family	Relationship		
Member	to You	Title	Department
[E.g.: Alex Jones	Sister's husband	Code Enf. Officer	Building]
	Market and the second s		

⁷ The amount should equal the threshold for a conflict of interest under the municipal ethics law. For example, if an official does not violate the ethics law by acting to benefit a person who donated \$500 to the official's campaign, then disclosure of that contribution should not be required on the annual disclosure statement. *See* sections 101(1)(h), 109(3)(d).

⁸ See sections 101(1)(b), 109(3)(e).

7. Volunteer Positions.	List each volunt	eer office or position that	you hold with any not-
for-profit organization. I			
you volunteered only in a			
			gistered domestic partner.9
You or			1
Spouse/RDP Na	me of Entity	Position N	ature of Business
[E.g.: Spouse Shepher	d's Food Panty	Bd. of Directors member	
		•	
8. Money You Owe (Elec	cted Officials and	Compensated Policymal	kers Only). List each
person or entity to which y	ou or your spous	e or your registered dome	estic partner owes
\$10,000 ¹⁰ or more. Do no	t list money owed	d to relatives, as defined i	n Question 1. Do not
list credit card debts unless			
Debtor	Creditor	Ту	pe of Obligation
[E.g.: John & Rose Smith	Chase Bank		Mortaga logal

Mortgage loan]

Chase Bank

See sections 101(1)(i), 109(3)(f).

The amount should be equal to the amount that would constitute a financial relationship between the official and the creditor, thus prohibiting the official from taking an official action that might benefit that creditor. See sections 101(1)(f), 109(3)(g).

9. Money Owed to	You (Elected Officials and	Compensated Policymakers Only). List each
person or entity that of	owes you or your spouse o	r your registered domestic partner \$10,00011
	money owed by relatives,	
Creditor	Debtor	Type of Obligation
[E.g.: John Smith	Alexis Doe	Personal loan]
[10. Customers and	clients. (Elected Officials	and Compensated Policymakers Only). List
the name of each custo	omer or client from whom	or from which you or your spouse or
registered domestic pa	artner earned \$1,000 or mo	ore during the year [previous calendar year].
Do not disclose the na	mes of medical or dental 1	patients, mental health clients, or, in the case

of lawyers, clients in criminal, bankruptcy, or domestic relations matters.]12

¹¹ The amount should be equal to the amount that would constitute a financial relationship between the official and the debtor, thus prohibiting the official from taking an official action that might benefit that debtor. See sections 101(1)(f), 109(3)(h).

¹² If, as discussed in connection with section 109, the municipality wishes to require disclosure of major customers and clients of elected officials and compensated policymakers, this provision

Name of Customer or Client
[E.g.: John Smith]
I certify that all of the above information is true to the best of my knowledge and that,
within the past two weeks, I have read the two-page ethics guide attached to this form. 13
Signed:
Date Signed:

may be added to the disclosure form. See sections 100(3), 101(1)(d), 109(3)(b)(i) and supra note 74.

¹³ A copy of the code of ethics (not the entire ethics law, just the code itself, that is, section 101) should be attached to the disclosure form, if the code is sufficiently short. If it is not, then a summary, of no more than two pages, should be attached.

TOWN OF CLARENCE



ANNUAL STATEMENT OF DISCLOSURE

FOR CALENDAR YEAR ____

FILL OUT COMPLETELY

NAME:	(Last)	(First)	(Middle	e initial)
ADDRESS:	(Street Address	(Town)	NY	(Zip Code)
SPOUSE (If	applicable):			
TOWN/COM	MMITTEE POSITION(S) HELD	DATE O	F HIRE/APPOINTMEN	T/ELECTION
		more and the accompany of the accompany		

The purpose of the Annual Disclosure is to identify potential conflicts of interest before such conflicts occur. In answering the questions on this Statement of Disclosure, the following definitions are critical:

- 1. Interest, as used in this Disclosure, is defined as follows:
 - A. Providing goods, influence, investment, property or service(s) to any person, business or entity for which compensation or benefit is expected or received, and
 - B. Holding ownership, title or right, alone or with others, to a property, within the Town or bordering the Town.
- 2. Contract, as used in this Disclosure, shall be defined in accordance with the Standard English usage.

	Please answer the following three questions and then sign your name.
1.	Do you, your spouse or dependents have an interest in any business or entity doing business with the Town currently or within the past twelve (12) months?
	YesNo
2.	Do you, your spouse or dependents have an interest in any contract made or executed by the Town within the past twelve (12) months?
	Yes No
3.	Do you receive any benefits, compensation, or other consideration that are derived directly or indirectly from your employment or association with the Town of Clarence other than your remuneration from the Town for the services you provide?
	YesNo
b	you answered yes to any of these 3 questions, you should describe the nature, source, amount of such enefits, compensation and other considerations as per instructions for filing and the Explanation of Annual statement of Disclosure. Please attach an additional sheet of paper if necessary.
States	
-	
D	ouring the current year, if there are any changes in your answer to items 1, 2, or 3 above, you must file an mended "Annual Disclosure" with the Town Clerk within thirty (30) days of such change.
T	HEREBY CERTIFY THAT THE INFORMATION I HAVE PROVIDED IN THIS ANNUAL DISCLOSURE IS RUE, CORRECT, AND COMPLETE. I HAVE REVIEWED THE CURRENT CODE OF ETHICS FOR THE OWN OF CLARENCE.
- Colonian	Date:
-	(Signature)
	(Print Name)

(Return this form to the Town Clerk)

(Revised 12/14/05; 08/23/05; 12/07; 9/09; 10/09; 1/06/2010)



Home Address

Town of Cheektowaga

ANNUAL STATEMENT of FINANCIAL DISCLOSURE

YEAR: 2017

ALL QUESTIONS MUST BE ANSWERED

THIS FORM MUST BE RETURNED on or before **May 15, 2017** to the following:

(a self-addressed/postage-paid envelope is enclosed for use in returning this form)

Town of Cheektowaga Board of Ethics Committee

c/o Town Clerk's Office

3301 Broadway Street

Cheektowaga, NY 14227

PART A: 1. NAME AND ADDRESS Last Name First Name Middle Initial Title Department Department Address Telephone No.

Telephone No.

2. SPOUSE AND CHILDREN

Spouse		79.444.4		
Child				Age:
Child			···	Age:
Child				Age:
Adult Member			*	
Adult Member				
household have	in any contrac	t involving the	Town or a	or adult members any municipality
	in any contract of Cheektowaga	t involving the	Town or a	
household have within the Town	in any contract of Cheektowaga	t involving the	Town or a	
household have within the Town (ANSWER <u>N/A</u>	in any contract of Cheektowaga	t involving the	Town or a	

4. POLITICAL PARTIES

List any position you have held within the last five (5) years in any political party
political committee or political organization. The term "political organization"
includes any independent body or any organization that is affiliated with or a
subsidiary of a political party: (ANSWER N/A IF NOT APPLICABLE)

PART B:

Note: For questions 5 thru 8, do not report exact dollar amounts. Instead, report categories of amounts using the following:

Category A: Under \$5,000

Category E: \$50,001 to \$75,000

Category B: \$5,001 to \$10,000

Category F: \$75,001 to \$100,000

Category C: \$10,001 to \$25,000

Category G: Over \$100,000

Category D: \$25,001 to \$50,000

5. FINANCIAL INTERESTS

A. Business Positions

List any office, trusteeship, directorship, partnership or other position in any business, association, proprietary or not-for-profit organization held by you, and/or your spouse and/or your children and/or any adult members of your household. Please indicate if the organization in which you or your family or adult household member holds such position, transacts business with the Town of Cheektowaga and describe the nature of same. (ANSWER N/A IF NOT APPLICABLE)

Title of Position	Organization	Type of Business Transactions
	Title of Position	Title of Position Organization

B. If the reporting individual practices law, is licensed by the Department of
State as a real estate broker or agent or practices a profession licensed by the
Department of Education, give a general description of the principal subject areas of
matters undertaken by such individual. Additionally, if such an individual practices
with a firm or corporation and is a partner or shareholder of the firm or corporation,
give a general description of principal subject areas of matters undertaken by such
firm or corporation. Do not list the names of the individual clients, customers or
patients: (ANSWER N/A IF NOT APPLICABLE)

C. Outside Employment/Other Income. Describe any outside occupation, employment, trade, business or profession providing more than \$1,000/year for you, your spouse and/or other adult member of your household, if any, and indicate whether such activities are regulated by any state or local agency. Also identify the source and nature of any other income in excess of \$1,000/year from any source not described above, including teaching income, lecture fees, consultant fees, contractual income, commissions, or other income of any nature, for you, your spouse and/or any adult member of your household:

Name of Person	Position	Name, Address and Description of Organization	State or Local Agency

D. Investments. Itemize and describe all investments which exceed a value of \$5,000 excluding personal savings accounts, retirement accounts, term life insurance, U.S. Government Treasury bonds, bills and notes, but including stocks, bonds, loans, pledged collateral and other investments, for you, your spouse and/or adult members of your household, if any:

(ANSWER N/A IF NOT APPLICABLE)

Name of Person	Description of Investment	Name and Address of Business	Category of Amount

E. Real Estate. List the location of all real estate, excluding your personal residence, within the Town of Cheektowaga (including real estate located within the Village of Depew and/or the Village of Sloan) in which you, your spouse, children and/or adult members of your household have an interest, regardless of its value: (ANSWER N/A IF NOT APPLICABLE)

Name of Person	Description of Investment	Name and Address of Real Estate	Category of Amount

F. List below all notes and accounts receivable, other than from goods or services sold, held by the reporting individual at the close of the taxable year last occurring prior to the date of filing and other debts owed to such individual at the close of the table year last occurring prior to the date of filing, in excess of \$1,000 including the name of the debtor, type of obligation, date due and the nature of the collateral securing payment of each, if any, excluding securities reported in item 5(a) hereinabove. Debts, notes and accounts receivable owed to the individual by a spouse, parent, sibling, child or adult member of your household need not be reported: (ANSWER NIA IF NOT APPLICABLE)

Type of Obligation, Date Due,	and Nature
of collateral, if any	

8. LIABILITIES

List any liability over	\$5,000 owed at any time de	uring the reporting period, other
than a loan from a fir	nancial institution or busines	s entity granted on terms mad
available to the genera	al public. <i>Do not include</i> any	y liability, such as a mortgage,
student loan, or a cre-	dit card account from a finan	cial institution or business entit
		eral public, loans secured b
		r liabilities that you owe to you
		dult member of your household
(ANSWER <u>N/A</u> IF NC		your nousensie
DELATIVEC MODICIA	10 F0D TUE T01111	
RELATIVES WORKIN	NAME OF TAXABLE PARTY OF TAXABLE PARTY.	
Please list any relativ	es, blood or through marria	ige, that are employees of the
Town of Cheektowaga.	. These include mother, father	er, brother, sister, husband, wife
son, daughter, step-so	n, step-daughter, mother-in-la	aw, father-in-law, brother-in-law
		. Also, list the name of the
	in: (IF DOESN'T APPLY, IN	
Relative Name	Relationship	Department
l hereby affirm under i	nenalty of periury that the fo	pregoing statements are true to
the best of my knowle		negonig statements are true to
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DATED:	, 2017	
DATED:		GNATURE

Annual Statement of Financial Disclosure For City of Buffalo 2018

If you fill in information electronically on this form, you must print out the form and sign. Please bring all signed forms to the City Clerk's office.

City Position(s) Boards/ Committees Paid/ Unpaid Please indicate if the answer to any of the following questions is "none". "Close Relative" means your spouse, child, stepchild, brother, sister, parent or a person you claimed as a dependent of your latest state or federal income tax return. Name and Address Last Name: First: M.I.: Title: Dept./ Agency: Dept./ Agency Agency: Dept./ Agency Address: Telephone No. Principal Residence: Telephone No. Email Spouse and Children Please provide the name of your spouse (if married) and the names of any dependent children. Spouse: Child/ Age:	CITY POSITION				
Committees Paid/ Unpaid Please indicate if the answer to any of the following questions is "none". "Close Relative" means your spouse, child, stepchild, brother, sister, parent or a person you claimed as a dependent of your latest state or federal income tax return. Name and Address Last Name: First: M.I.: Title: Dept./ Agency: Dept./ Agency: Dept./ Agency: Dept./ Agency Address: Telephone No. Principal Personal Telephone No. Email Spouse and Children: Please provide the name of your spouse (if married) and the names of any dependent children.					and the second second
Unpaid Please indicate if the answer to any of the following questions is "none". "Close Relative" means your spouse, child, stepchild, brother, sister, parent or a person you claimed as a dependent of your latest state or federal income tax return. Name and Address Last Name: First: M.I.: Title: Dept./ Agency: Dept./ Agency: Dept./ Agency Personal Telephone No. Principal Residence: Telephone No. Email Spouse and Children Please provide the name of your spouse (if married) and the names of any dependent children.					
"Close Relative" means your spouse, child, stepchild, brother, sister, parent or a person you claimed as a dependent of your latest state or federal income tax return. Name and Address Last Name: First: M.I.: Title: Dept./ Agency: Dept./ Agency Department Telephone No. Principal Personal Telephone No. Email Spouse and Children Please provide the name of your spouse (if married) and the names of any dependent children. Spouse:					
Name and Address Last Name: First: M.I.: Title: Dept./ Agency: Dept./Agency Address: Department Telephone No. Principal Personal Telephone No. Email Spouse and Children Please provide the name of your spouse (if married) and the names of any dependent children. Spouse:	Please indicate if the answer to any	of the following questions is "r	none".		
Last Name: First: M.I.: Title: Dept./ Agency: Dept./ Agency Department Telephone No. Principal Residence: Email Spouse and Children Please provide the name of your spouse (if married) and the names of any dependent children. Spouse:	"Close Relative" means your spouse your latest state or federal income	e, child, stepchild, brother, siste tax return.	er, parent or a person yo	u claimed as a dep	endent on
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Spouse and Children Please provide the name of your spouse (if married) and the names of any dependent children. Spouse:					
Please provide the name of your spouse (if married) and the names of any dependent children. Spouse:	Email				
		ouse (if married) and the name:	s of any dependent child	iren.	
Child/ Age:	Spouse:				
	Child/ Age:		en e		
Child/ Age:	Child/ Age:				
Child/ Age:	Child/ Age:				

nterest in Contracts Describe any interest of yours or a cl	ose relative in any contract involving	the City of Buffalo or any municipal
orporation located within the City o	of Buffalo.	
Name of Family Member	Contract	Description
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t any positions you held within the	e last five (5) years as an officer of any	political committee or political organization.
st any positions you held within the re term "political organization" incl	elast five (5) years as an officer of any udes any independent body or organ	political committee or political organization. ization that is affiliated with or a subsidiary of
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it any positions you held within the e term "political organization" inclocalitical party. Party/ Organization Fits and Honorariums It the source of all gifts received in the served during the last year by you come.	the past year from the same or affilia	ization that is affiliated with or a subsidiary of
ne term "political organization" inclipolitical party. Party/ Organization fts and Honorariums t the source of all gifts received in	the past year from the same or affilia	ization that is affiliated with or a subsidiary of ition

List the address of each piece interest through a family trust (5) miles of the boundary of the soundary of th	cor business organization). List only	ive own or have a financial interest in real estate that is in the City of Buffa	n (including an alo or within five
Name of Family Member	Relationship to You	Address of Real Estate	Type of Investmen
our Employment or Busing ist the name of any employ coods sold or produced or co		eceive compensation for services er or employee.	rendered or
Name of Employer or Business	Nature of Business	Your position	
	· · · · · · · · · · · · · · · · · · ·		
Charte and all at the company of			
our Spouse's Employment ist the employment inform			
Name of Employer or Business	Nature of Business	Spouse's Position	
			- 100 151 MARINE AVENUE
	The second secon	Market Control of the	

Real Estate

activity with either the City or City Development Agency within the last year or is expected to have such activity in the next year, except for a publicly traded corporation of which you own less than five percent of the outstanding stock and except for a personal savings or retirement account.			
Name of Employer or Business	Nature of Business	Type of Business	

Date:

List your interest in business entities or trusts in which you or a close relative has had financial or regulatory

Please keep this booklet, the copy of your completed statement and receipt for your records.

Investments

Signature:

Other Financial Interest A. Outside Employment. Describe any outside occupation, or a close relative, if any, and indi-	employment, trade, busin cate whether such activitio	ess or profession providing more than \$1,000/es are regulated by any state or local agency.	year for you
Name of Family Member	Position	Name and Address of Organization	State/Local
B. Future Employment. Describe any contract, promise or after leaving your City office or po		n you and anyone else with respect to your em	ployment
Name of Family Member	Position	Name and Address of Organization	State/ Local
		1,000/ year from any prior employer, including fit sharing plan, severance pay or payments und	
Name and Address of Income Source:	Desc	ription of Income (Pension, deferred, etc.)	
·			

expenditures in excess of \$25	ce of any third-party payment or reimbursement for City of Buffalo travel-related 0.00 for any matter that relates to your official duties. The term "reimbursement" includes rovided by anyone other than the City for speaking engagements, conference or fact-
Source	Description
Loans and Debts	
Describe all loans and debts such as primary mortgages, the normal course of busine merchants and which are no	s of you or a close relative in excess of \$5,000 (excluding retail accommodations home equity loans, charge accounts, lines of credit and credit cards extended in ess which are ordinarily available to the general public by financial institutions or extended in circumstances in which it might be reasonably inferred that they ention to influence or reward you in relation to the performance of your duties)
Name of Family Member	Name and Address of Creditor
<u>-</u> -	
Signature:	Date:

Annual Statement of Financial Disclosure Town of Amherst

For Calendar Year 2018

1. 1	Name:
,	Address:
I	Email Address:
	If married, spouse's name:
2.	a. Title of Town Position:
	b. Department, Agency or other Governmental Entity
ind	Do you receive any benefits, compensation or other consideration that are derived directly or irectly from your employment or association with the Town of Amherst, other than your nuneration from the Town?
	YES NO
or	If "YES", please describe the nature, source of and amount of such benefits, compensation other consideration.
	Nature Source Amount
	•
of	List the address and SBL (located immediately above your name and address on the tax bill) all real property in which you, your spouse or other family member of your household has an mership or other financial interest.
	Name of Owner Address

5. List the name and address of any partnership, unincorporated association, corporation, business or employer of any sort, of which you or your spouse is a member, officer or employee, or from which you or your spouse derive income of any nature, giving your position and/or your spouse's position, if any, with such entity.			
S	elf/Spouse	<u>Position</u>	Organization and Address
dantina	2		
Analysis	angan mana ana ah ji mjihan matan dan mang din Jeroman ji kacing pumba ini dan jahan iming Garman din disimbuni	о на применения в постоя на постоя на постоя на постоя на применения на применения в постоя на применения на п На применения на применени	

busir	ness, of which yo	ou or your spouse	orporation, partnership, unincorporated association, or legally or beneficially owns or controls more than five ding stock or other ownership rights.
<u>s</u>	elf/Spouse	Organizati	on and Address
-			
ر الم	1		
has			e general nature thereof, from which you or your spouse two thousand dollars (\$2,000) during the previous
9	Self/Spouse	General N	<u>ature</u>
_			
8. If you are unable, after reasonable effort, to obtain any of the information required herein, so state and explain.			
-			
Sign	nature of Report	ing Individual	 Date