



Chautauqua, Cattaraugus, Allegany & Steuben Counties
Southern Tier Extension Railroad Authority
Center for Regional Excellence, 4039 Route 219, Suite 200, Salamanca, New York 14779
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"This institution is an equal opportunity organization"

Terry Everetts, Chairman
Richard Zink, Chief Executive Officer

LOBBYING POLICY

1. Applicability

This Lobbying Policy shall apply to all officers, Board members, employees, and agents of the Chautauqua, Cattaraugus, Allegany, and Steuben Southern Tier Extension Railroad Authority (STERA). These policies shall serve as a guide for official conduct and are intended to enhance the ethical and professional performance of the Authority in the accomplishment of its mission and to preserve public confidence in the Authority's activities in pursuit of its mission.

2. Definitions

- A. For the purposes of this policy, lobbying shall be defined as advocacy with the intention of influencing decisions made by legislators and officials in the State and / or Federal government, consisting of requesting that policymakers to take a specific position on a specific piece of legislation, by any officers, Board members, employees, and agents of STERA.
- B. For the purposes of this policy, formal and informal inquiries and requests for State and / or Federal technical and / or financial or other assistance, submission of grant or loan applications for State and / or Federal technical, financial, or other assistance, and education of providers about the need for State and / or Federal technical, financial, or other assistance shall not be considered lobbying activities, whether undertaken by an officer, Board member, employee, or agent of STERA, provided that the assistance sought does not relate to a specific piece of legislation, and also provided that the assistance sought is sought for a purpose that is consistent with the accomplishment of STERA's mission, and also provided that no State and / or Federal funds shall be used to fund these activities, and at all times shall be permitted activities.

3. Lobbying Provisions

- A. Lobbying, whether done by an officers, Board member, employee, or agent of STERA, shall be an acceptable activity, provided that the assistance sought is sought for a purpose that is consistent with the accomplishment of STERA's mission, and also provided that no State and / or Federal funds shall be used to fund lobbying activities.
- B. Directors, Board members, and employees of STERA must conduct themselves at all times in a manner that avoids any appearance of impropriety, so that there shall be no indication or public perception of a potential violation of the public trust.

4. Implementation of Lobbying Policy

- A. This Lobbying Policy shall be provided to all directors and employees upon commencement of employment or appointment and shall be reviewed annually by the Governance Committee.
- B. The STERA Board may designate an Ethics Officer, who shall report to the STERA Board and shall have the following duties:

- Counsel in confidence Authority directors and employees who seek advice about ethical behavior with respect to actual, suspected, or potential lobbying activities that are perceived as inconsistent with this policy.
- Receive and investigate complaints about possible ethics violations with respect to actual, suspected, or potential lobbying activities that are perceived as inconsistent with this policy.
- Dismiss complaints found to be without substance.
- Prepare an investigative report of any positive findings for action by the Executive Director or the Board.

5. Penalties

In addition to any penalty contained in any other provision of law, an Authority director or employee who knowingly and intentionally violates any of the provisions of this policy may be removed in the manner provided for in law, rules, or regulations.

6. Reporting Violations of This Lobbying Policy

Employees and directors are required to report possible unethical behavior with respect to actual, suspected, or potential lobbying activities by a director, employee, or agent of the Authority to the Ethics Officer. Employees and directors may file ethics complaints anonymously and are protected from retaliation by the policies adopted by the Authority.

**This Policy was approved and adopted on November 15, 2010
by the Board of Directors of the
Southern Tier Extension Railroad Authority.**

Thomas M. Barnes

Name

Corporate Secretary

Office

March 9, 2015

Date