



**ERIE COUNTY WATER AUTHORITY
INTEROFFICE MEMORANDUM**

To: Jerome D. Schad, Chair
Mark S. Carney, Vice Chair

Cc: Terrence D. McCracken, Secretary
Karen A. Prendergast, Chief Financial Officer
Russell J. Stoll, Chief Operating Officer
Leonard F. Kowalski, Executive Engineer
Paul W. Wolf, Chairman, Ad Hoc Member
Maureen Krause, Ad Hoc Member

From: Margaret A. Murphy, General Counsel

Date: March 16, 2020

Subject: Recommendations from the Independent Ethics Panel

The Independent Ethics Panel (the "Panel") held a meeting on Friday, March 13, 2020 to review and recommend changes to the following:

- (1) Policy No. 11: Code of Ethics & Conflict of Interest Policy
- (2) Policy No. 16: Whistleblower Protection Policy
- (3) ECWA Financial Disclosure Form for Calendar Year 2019

While most recommended revisions are minor, the Panel is recommending that the Board of Commissioners amends its policy relating to the acceptance of gifts. Currently, the Board's policy prohibits the acceptance of:

any gift, having a value of seventy-five dollars or more, whether in the form of money, service, loan, travel, thing or promise, or in any other form under circumstances in which it could reasonably be inferred that the gift was intended as a reward for any official action on their part; excepting entertainment, meals or social invitations that are customary and proper under the circumstances and are wholly in keeping with good business ethics, and do not place the recipient under obligations

The Panel is recommending the policy be amended to prohibit "any gift, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment or anything of value."

The Panel has also forwarded the following documents for review by the Governance Committee and the Board of Commissioners:

- (1) Final Minutes for the September 12, 2019 Panel Meeting;
- (2) Draft Minutes for the March 13, 2020 Panel Meeting;
- (3) Recommended Amendments to the Policy No. 11: Code of Ethics & Conflict of Interest Policy (with tracked changes and in final form);
- (4) Recommended Amendments to the Policy No. 16: Whistleblower Protection Policy (with tracked changes and in final form);
- (5) Proposed 2019 ECWA Financial Disclosure Statement (with tracked changes and in final Word form);
- (6) 2019 Employee Acknowledgement;
- (7) 2019 Vendor List;
- (8) List of Vendors Excluded from 2019 Vendor List (with Code Key);
- (9) Employee Cover Letter; and
- (10) Employee Email.

The Panel's Chair, Paul W. Wolf, will be present at the Governance Committee to discuss these recommendations and documents.

MINUTES of the MEETING of the ERIE COUNTY WATER AUTHORITY'S INDEPENDENT ETHICS PANEL held in the office, 3030 Union Road, Cheektowaga, New York 14227 on the 12th day of September 2019.

**PRESENT: Paul W. Wolf, Chairman, Ad hoc Member
Matthew Plunkett, Ad hoc Member
Maureen Krause, Ad hoc Member
Margaret A. Murphy, General Counsel
Shari Zajdel, Confidential Secretary**

CALL TO ORDER AT 9:40 a.m.

I. - ROLL CALL

II. - READING OF MINUTES

Motion by Maureen Krause seconded by Matthew Plunkett and carried to read the Minutes of the Meeting held on Thursday, July 11, 2019.

III. - APPROVAL OF MINUTES

Motion by Maureen Krause seconded by Matthew Plunkett carried to approve the Minutes of the Meeting held on Thursday, July 11, 2019.

IV. NEW BUSINESS

1. IEP to interview three Authority employees regarding Financial Disclosure Statement for Calendar Year 2018

Motion made by Mr. Plunkett and seconded by Ms. Krause to enter Executive Session at 9:50 a.m. to discuss with an employee his Financial Disclosure Statement and to have Ms. Murphy and Ms. Zajdel present during the Executive Session.

Motion carried 3-0.

Motion made by Mr. Plunkett and seconded by Ms. Krause to exit Executive Session at 10:15 a.m.

Motion carried 3-0.

Discussion by IEP members relating changes to the Financial Disclosure Statements for calendar year 2019, specifically for conflicts with attorneys.

Motion made by Ms. Krause, seconded by Mr. Plunkett to accept as complete the Financial Disclosure Statement submitted by Associate Attorney Ronald Bennett.

Motion carried 3-0.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Ms. Krause and seconded by Mr. Plunkett Executive Session at 10:20 a.m. to discuss with an employee his Financial Disclosure Statement and to disclose a letter sent by another employee relating to her Financial Disclosure Statement. Ms. Murphy accompanied the IEP members into the Executive Session.

Motion made by Mr. Plunkett and seconded by Ms. Krause to leave Executive Session at 11:30 a.m.

Motion made by Ms. Krause and seconded by Mr. Plunkett to approve the Financial Disclosure Statement of Daniel Michnik.

Motion carried 3-0.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Ms. Krause, seconded by Mr. Plunkett to accept as complete the Financial Disclosure Statement submitted by Deputy Associate Attorney Darlene Sikorski-Petritz.

Motion carried 3-0.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

2. IEP review of responses from seven Authority employees regarding response to letter from General Counsel regarding the Financial Disclosure Statement.

The panel reviewed Financial Disclosure Statements from seven employees that re-submitted their responses to the Panel.

Motion made by Ms. Krause and seconded by Mr. Plunkett to approve the Financial Disclosure Statement of John Gilmour.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Ms. Krause and seconded by Mr. Plunkett to approve the Financial Disclosure Statement of Steven Battaglia.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Mr. Plunkett and seconded by Ms. Krause to approve the Financial Disclosure Statement of Joseph Hlavaty.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Ms. Krause and seconded by Mr. Plunkett to approve the Financial Disclosure Statement of Adam Massaro.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Ms. Krause and seconded by Mr. Plunkett to approve the Financial Disclosure Statement of Daniel NeMoyer.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Mr. Plunkett and seconded by Ms. Krause to approve the Financial Disclosure Statement of Susan Rinaldo.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Ms. Krause and seconded by Mr. Plunkett to approve the Financial Disclosure Statement of Jeffrey Sylvester.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

Motion made by Ms. Krause and seconded by Mr. Plunkett to approve the Financial Disclosure Statement of Ronald Schultz, an employee that was promoted on August 5, 2019 and now required to file a Financial Disclosure Statement.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

3. IT Department discussion regarding live streaming of meetings

Jeffrey Schlierf, Acting Director of IT joined the Panel to discuss the options of live streaming of the meetings with the Panel. Although the Independent Ethics Panel is an advisory committee and it is not regulated by Open Meetings Law, Mr. Wolf and other IEP members would like to be guided by OML principles. Ms. Krause recommended that the Commissioners decide on how to proceed with live streaming, GoToMeeting, audio taping of the meetings, etc.

4. Changes to Financial Disclosure Statement for future filings

The Panel discussed and recommended changes to the Financial Disclosure Statement. Ms. Murphy will draft the changes and send to the IEP for review. The recommended changes will be approved at the next meeting.

5. Procedure for new hires at the Authority required to complete Financial Disclosure Statement

Ms. Murphy is named as a contact person at the Authority that employees can contact to ask questions regarding the Financial Disclosure Statement or the Code of Ethics and Conflict of Interest Policy. Ms. Murphy proposes to initially review any Financial Disclosure Statement submitted by a new employee. Unless such disclosure statement raises an issue, Ms. Murphy would be authorized to approve the statement. However, if the disclosure statement raises an issue, the statement will be forward by email to the IEP members for their review and approval. The panel can then conduct a phone conference to review and decide if further action should to be taken. This procedure was approved by all three IEP members.

V. ADJOURNMENT

Motion by Ms. Krause and seconded by Mr. Plunkett. Krause and carried to schedule the next meeting for March 13, 2020 and adjourn at 12:39 p.m.

VOTE

Ayes: Three; Members Wolf, Plunkett and Krause

Noes: None

MINUTES of the MEETING of the ERIE COUNTY WATER AUTHORITY'S INDEPENDENT ETHICS PANEL held in the office, 3030 Union Road, Cheektowaga, New York 14227 on the 13th day of March 2020.

**PRESENT: Paul W. Wolf, Chairman, Ad hoc Member
Matthew Plunkett, Absent
Maureen Krause, Ad hoc Member
Margaret A. Murphy, General Counsel**

CALL TO ORDER AT 9:42 a.m.

I. - ROLL CALL

II. - READING OF MINUTES

Motion by Maureen Krause seconded by Paul Wolf to waive the reading of the Minutes of the Meeting held on September 12, 2019.

Motion carried,

III. - APPROVAL OF MINUTES

Discussion: Mr. Wolf stated that on page 4 of the draft minutes that he and other IEP members recognized that its meetings are not governed by the Open Meetings Law, but the members stated a desire to follow OML principles and that the minutes should reflect that understanding.

Motion to approve the minutes, as amended, by Paul Wolf seconded by Maureen Krause for the meeting held on September 12, 2019.

Motion carried

IV. NEW BUSINESS

1. Review and discuss proposed changes to ECWA Financial Disclosure Statement for Calendar Year 2019

IEP members read each page of the proposed financial disclosure statement and made additional changes to the statement. The IEP members are recommending that no ECWA member, ad hoc member, officer or employee accept gifts, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment, or anything of value.

Motion made by Mr. Wolf and seconded by Ms. Krause to recommend to the Authority's Board of Commissioners (the "Board") the proposed changes to 2019 ECWA Financial

Disclosure Statement.

Motion carried.

2. Review and discuss proposed revisions to the Code of Ethics & Conflict of Interest Policy

IEP members reviewed the proposed changes to the Policy No. 11 (Code of Ethics & Conflict of Interest Policy) and made additional changes to the policy. The IEP members are recommending that no ECWA member, ad hoc member, officer or employee accept gifts, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment, or anything of value and that an offer to make such a gift be reported to the Authority's General Counsel or the IEP Chair. The IEP members also reviewed Policy No. 6 (Whistleblower Protection Policy) and recommends the Authority's General Counsel make the necessary changes to Policy No. 6 so that it is consistent with Policy No.11

Motion made by Ms. Krause and seconded by Mr. Wolf to recommend to the Authority's Board the proposed changes to Policy No. 6 and Policy No. 11.

Motion carried.

3. Review and discuss proposed Employee Acknowledgement

IEP members reviewed and redrafted the Employee Acknowledgement.

Motion made by Mr. Wolf and seconded by Ms. Krause to recommend to the Authority's Board the proposed Employee Acknowledgement.

Motion carried.

4. Review and discuss the 2019 Vendor List

IEP members reviewed the proposed 2019 Vendor list and recommends all vendors receiving payments of \$500 or less be removed from the list.

Motion made by Ms. Krause and seconded by Mr. Wolf Ms. Krause to recommend to the amended 2019 Vendor List.

Motion carried.

5. Review and discuss draft employee letter and email text to employees

IEP members reviewed and revised the proposed language to be used in a cover letter and in the email to be sent to Authority personnel.

Motion made by Mr. Wolf and seconded by Ms. Krause to recommend to the Authority the language to be used in communications.

Mr. Wolf wanted to discuss whether documents on the IEP agenda should be posted prior to the meeting. After a discussion between IEP members and the Authority's General Counsel, it was decided the recommendations from these IEP meetings will be forwarded to the Board and posted as part of the Board's agenda and packet.

Motion by Ms. Krause and seconded by Mr. Wolfe to schedule the next meeting for Friday, June 12, 2020 at 9:30 a.m.

Motion carried.

V. ADJOURNMENT

Motion by Mr. Wolf and seconded by Ms. Krause to adjourn the meeting at 1:17 p.m.

Motion carried.

**ERIE COUNTY WATER AUTHORITY
HR Policies/Procedures**

Re:	CODE OF ETHICS & CONFLICTS OF INTEREST POLICY	Policy No.	11.0
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Application: All Employees	Adopted:	06/16/05
	Amended:	05/11/06
		04/03/08
		05/21/09
		01/26/12
		08/22/13
		03/26/19
		03/24/20

**ARTICLE I
DEFINITIONS**

Section 1: Definitions.

- (a) “Ad hoc member” means a committee member who is not a duly appointed Commissioner and who is appointed to serve as a non-voting committee member pursuant to the Authority’s By-laws.
- (b) “Authority” means the Erie County Water Authority.
- ~~(e) “Attorney” means the Authority’s Attorney, who serves as its general counsel and chief legal advisor.~~
- (c) “Board” means the Authority’s Board of Commissioners.
- (d) “Chief Operating Officer” means the individual whose position is defined under the job specifications for Executive Director.
- (e) “Code” means this Code of Ethics and Conflicts of Interest Policy.
- (f) “Employee” includes any Authority employee holding either a full-time position or a regular, part-time position.
- (g) “Ethics Committee” means a standing committee of the Board, as described in Article IV, section 4 of the Authority’s By-Laws.
- (h) “First-degree family members” mean parents, step-parents, children, step-children, and siblings, including half- and step-siblings.

~~(h)~~(i) “General Counsel” means the individual whose position is defined under the job specifications for Attorney.

~~(j)~~(i) “Immediate family” means any first-degree family member related by blood or marriage.

~~(j)~~(k) “Interested Person” means any member, ad hoc member, officer, or employee who has a direct or indirect personal financial interest in any matter pending before the Authority.

~~(k)~~(l) “Independent Ethics Panel” or “IEP” means the entity whose powers are proscribed in Article VI, section 4, sub-section (e) of the Authority’s By-Laws.

~~(l)~~(m) “Members” mean the Authority’s Commissioners~~ss~~, duly appointed pursuant to Public Authorities Law § 1053(1).

~~(m)~~(n) “Officers” mean the Chair, Vice Chair and Treasurer and other officers as may be appointed pursuant to Public Authorities Law § 1053(3), including but not limited to the Secretary to the Authority.

~~(n)~~(o) “Personal financial interest” means a financial interest benefiting a member, ad hoc member, officer, or employee, and/or his/her immediate family.

~~(o)~~(p) “Personal loan” means a loan to the member, ad hoc member, officer, or employee, or member of his/her immediate family.

ARTICLE II CODE OF ETHICS

Section 1: Purpose.

As a public benefit corporation, ~~the Erie County Water Authority~~ (the “Authority”) must conduct its operations in a manner that best serves the interests of its customers and the general public. Its mission is to provide the Authority’s ~~its~~ customers with a plentiful supply of safe, high quality and affordable drinking water through a reliable infrastructure.

The Authority expects its members, ad hoc members, officers, and employees to observe high ethical standards of conduct in the performance of their duties, and in compliance with all laws and regulations governing the Authority’s operation. This Code of Ethics shall serve as a guide for official conduct and is intended to enhance the ethical and professional performance of the Authority’s members, ad hoc members, officers, and employees and to preserve the public confidence in the Authority’s mission.

Section 2: Policy.

Members, ad hoc members, officers, and employees shall perform their duties with transparency ~~and~~, without favor, and shall refrain from engaging in outside matters of personal financial interest or of personal interest, including other employment, that could impair their independence of judgment, or prevent the proper exercise of one's official duties.

This Code ~~of Ethics~~ is in addition to any and all other laws, restrictions, standards and provisions applicable to the conduct of the Authority's members, ad hoc members, officers, and employees.

Section 3: Standard of Conduct.

- (a) The Authority's members, ad hoc members, officers, and employees shall:
 - (1) Endeavor to perform the duties of their position to the best of their ability and in a spirit of service to all persons and concerns for which the Authority was created;
 - (2) Uphold the high standards of dedicated public service rendered over the years by Authority members, ad hoc members, officers, and employees;
 - (3) Support and encourage fellow employees in the proper execution of their duties;
 - (4) ~~When a question of conduct or regulation occurs,~~ Address any question of conduct or regulation that may occur ~~the question~~ to either the Authority's Attorney General Counsel, or the Chair of the Independent Ethics Panel (IEP).
- (b) Members, ad hoc members, officers, and employees shall conduct themselves at all times in a manner that avoids an appearance that they can be improperly or unduly influenced, that they could be affected by the position of, or relationship with, any other party, or that they are acting in violation of the ~~ir~~ public trust.
- (c) Members, officers, and employees shall manage all matters within the scope of the Authority's mission independent of any other affiliations or employment. Members, including ad hoc members, officers, and employees shall strive to fulfill their professional responsibility to the Authority without bias and shall support the Authority's mission to the fullest.

Section 4: Prohibited Conduct.

- (a) The Authority's~~No~~ members, ad hoc members, officers, ~~and~~ employees shall not:
- (1) ~~Directly or indirectly received any compensation or interest, financial or otherwise, or incurred any obligation, which would be a substantial conflict with the proper discharge~~Receive any compensation for or have an interest, financial or otherwise, direct or indirect, or incur any obligation that is in substantial conflict with the proper discharge of their duties with the Authority;
 - (2) Engage in other employment that might impair the independence of their judgment in the execution of their duties with the Authority;
 - (3) Disclose confidential information, acquired in the course of official duties or use such confidential information to further personal financial interests;
 - (4) Directly or indirectly solicit, ~~or~~ accept or receive any gift, ~~having a value of seventy five dollars or more,~~ whether in the form of a promise, money, services, a loan, lodging, meals, entertainment or anything of value. ~~travel, thing or promise, or in any other form under circumstances in which it could reasonably be inferred that the gift was intended as a reward for any official action on their part; this provision excludes~~excepting entertainment, meals or social invitations that are customary and proper under the circumstances and are wholly in keeping with good business ethics, and do not place the recipient under any obligation to take any official actions;
 - (5) Arrange for the extension of credit or renew an extension of credit in the form of a personal loan from the Authority.
- (b) Unless otherwise permitted by the IEP or the Ethics Committee, no immediate family member of a member, ad hoc member, officer, or employee may directly or indirectly solicit, accept, or receive any other items described in § 4(a)(4) of this Article.
- (c) Unless otherwise permitted by the IEP or the Ethics Committee, no member, ad hoc member, officer, employee nor ~~the an~~ immediate family member of a member, ad hoc member, officer, or employee may engage in the following actions:
- (1) Speculating or dealing in equipment, supplies, or materials normally purchased by the Authority;

- (2) Borrowing money from the Authority, suppliers, significant commercial customers, individuals or firms with whom the Authority does business (loans or mortgages from banks or individuals doing business with the Authority are exempt if the terms are at current rates and the customary collateral for such transactions is provided);
- (3) Acquiring an interest in real estate in which it is known that the Authority also has a current or anticipated interest;
- (4) Misusing information to which the individual has access by reason of his or her position, including, but not limited to, disclosing~~Misusing information to which the individual has access by reason of his or her position such as by disclosing~~ confidential information (of a technical, financial or business nature) to others outside or inside the business (whether or not a consideration is received), or using such information for one's own interest or the interest of an immediate family member;
- (5) Soliciting funds or other items of value from the Authority's vendors, suppliers or consultants for ~~self-interest~~self-interest ~~oneself~~ or ~~for the~~ benefit of any other organization, club or person, whether such other persons or entities are charitable, religious or profit-making;
- (6) Serving as an officer, director, ~~or~~ manager, consultant, volunteer, or an independent contractor -with another company or business organization directly or indirectly related to the Authority without specific authorization from the Authority; and
- ~~(7) Legally representing, or exerting influence in favor of a current or potential vendor, including but not limited to, customers to assisting in the drafting of~~submit applications, plans or proposals for Authority approval or submitting such applications, plans or proposals to the Authority. ~~other compliance information to the Authority for approval.~~
- (7)
- (d) The prohibited actions and activities set forth in this section do not encompass every situation that may lead to a conflict of interest.

**ARTICLE III
CONFLICTS OF INTEREST POLICY**

Section 1: Purpose.

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- (a) The purpose of this Conflicts of Interest Policy is to protect the Authority's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of a member, ad hoc member, officer, or employee of the Authority. This policy is intended to supplement, but not replace, any applicable state laws governing conflicts of interest applicable to the Authority.

 - (b) A conflict of interest is just one example of a violation of ethical conduct. This policy is intended to complement the Authority's Code of Ethics by providing specific procedures to deal with conflicts of interest. To the extent that a matter falls within the scope of both this policy and the Authority's Code of Ethics, the provisions of this Conflicts of Interest Policy shall govern.

Section 2: Prohibition against Conflicts.

- (a) Section 1068 of the New York Public Authorities Law sets forth the following requirements with respect to conflicts of interest:

It shall be a misdemeanor for any of the members of the authority, or any officer, agent, servant or employee thereof, employed or appointed by them to be in any way or manner interested directly or indirectly in the furnishing of work, materials, supplies or labor, or in any contract therefor which the authority is empowered by this act to make.

In the event the Authority discovers a violation of the above provision, the Authority shall conduct an investigation and, if warranted, report the offense to the Inspector General of the State of New York.

- (b) This Conflicts of Interest Policy provides additional guidance regarding actual or potential conflicts of interest, including circumstances not within the scope of Public Authorities Law § 1068.

Section 3: Personal Financial Interest.

- (a) A person has a personal financial interest if the person has, directly or indirectly, through business, investment or family:

- (1) an ownership or investment interest in, or employment with, any entity with which the Authority has a transaction or [business](#) arrangement; or
- (2) a compensation arrangement with any entity or individual with which the Authority has a transaction or arrangement; or
- (3) a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Authority is negotiating a transaction or arrangement.

- (b) Compensation includes direct and indirect remuneration as well as gifts or favors that are substantial in nature.

- (c) A personal financial interest is not necessarily a conflict of interest. No conflict of interest exists where a personal financial [interest](#) arises solely from an immediate family member that holds a clerical, ministerial or low-level management position with an existing or potential vendor, lacks the power to influence the relationship between the business and the Authority and did not obtain his or her position as a means to influence a member, ad hoc member, officer, or employee of the Authority.

- (d) A person who has a personal financial interest may have a conflict of interest only if the Board determines that a conflict of interest exists pursuant to the enforcement and hearing procedures set forth in Article V, § 2 of this Code.

Section 4: Duty to Report.

(a) A member, ad hoc member, officer, or employee must immediately report to the Authority's General Counsel or to the IEP Chair gifts of any value, whether in the form of a promise or an offer to give money, services, a loan, or to provide lodgings, meals or entertainment.

(b) An interested person must disclose the existence of his or her personal financial interest and all material facts surrounding the Financial Interest to the Authority's Attorney General Counsel and to the IEP.

(c) If the Authority's Attorney General Counsel or the IEP have reasonable cause to believe an interested person has failed to disclose an actual or possible conflict of interest, they shall inform the interested person of the basis for such belief and afford him/her an opportunity to explain the alleged failure to disclose.

(d) After disclosure of the personal financial interest, the Attorney General Counsel and the IEP will interview the interested person and conduct whatever investigation is warranted by the disclosure.

(e) After exercising due diligence, the IEP will report its findings and recommendation to the Ethics Committee. The Ethics Committee will review such findings and recommendations. If the Ethics Committee determines further action should be taken, it will forward the matter to the Board.

Section 5: Standard of Review.

(a) After exercising due diligence, if the Ethics Committee determines the Authority can obtain an equal or more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest, then it will forward the matter to the Board with its recommendation.

(b) If the Ethics Committee determines an equal or more advantageous transaction or arrangement is not reasonably attainable under circumstances that would not give rise to a conflict of interest, then it will forward the matter for the Board to determine whether the transaction or arrangement should proceed or be terminated. A Board ruling to proceed

shall include a determination that the transaction or arrangement is in the Authority's best interest, is done for its own benefit and is fair and reasonable to the Authority.

ARTICLE IV EMPLOYMENT RESTRICTIONS

Section 1: One-Year Moratorium.

- (a) No person who has served as a member, officer or employee of the Authority shall within a period of one year after the termination of such service or employment appear or practice before the Authority or receive compensation for any services rendered by the member, officer or employee through or on behalf of any person, firm, corporation or association in relation to any case or transaction with respect to which such person was directly concerned, or participated in, during the period of his or her service with the Authority.
- (b) Notwithstanding the foregoing, the one-year moratorium shall not apply to (i) normal business issues arising as a result of the person's status as a water customer of the Authority and (ii) professional services provided by such person pursuant to a written agreement with the Authority, to the extent such agreement is otherwise consistent with this Code of Ethics.

Section 2: Nepotism Policy.

- (a) In no event shall an immediate family member of a member be hired during the term of the member.
- (b) An immediate family member of an ad hoc member, officer, or employee may be considered for a permanent position only if all of the following conditions are met:
 - (1) The ad hoc member, officer, or employee had no role in approving or appointing the immediate family member, pursuant to HR Policy No. 92 (Employment Opportunities Posting and Hiring); and
 - (2) The immediate family member is an appointment from a Civil Service List; or
 - (3) There will be no supervisory relationship between the immediate family member and the related ad hoc member, officer, or employee, and the immediate family member and the related member, ad hoc member, officer, or employee will not work in the same department.

- (c) If current members, ad hoc members, officers, or employees marry, it may be necessary for the Authority to reassign one or both individuals, particularly in the case of close working, or direct supervisory relationships.
- (d) An immediate family member may be considered for summer or temporary employment only if all of the following conditions are met:
 - (1) There will be no supervisory relationship between the immediate family member and the related ad hoc member, officer, or employee; and
 - (2) The immediate family member and the related ad hoc member, officer, or employee will not work in the same department.
- (e) In no event shall a related ad hoc member, officer, or employee participate in any decision to hire, promote, discipline, or discharge an immediate family member.
- (f) The effective date of this section is March 26, 2019. Immediate family members whose date of hire is before May 1, 2018 may continue in their current position or may be promoted despite the provisions set forth in this section.

ARTICLE V IMPLEMENTATION & ENFORCEMENT

Section 1: Distribution.

The Code shall be reviewed annually by the Ethics Committee and the Board and posted on the Authority's website. All members, ad hoc members, officers, and employees shall be given a copy of this Code upon appointment or commencement of employment and thereafter annually.

Section 2: IEP & Ethics Committee.

- (a) The Board designates the ad hoc members of the IEP as its Ethics Officers, who shall report to the Ethics Committee and Board.
- (b) The Ethics Committee shall prepare, review, update, and approve financial disclosure statements to be filed by members, ad hoc members, officers, and designated employees with the IEP.
- (c) The IEP shall have the following duties:

- (1) Interpret and make recommendations with regard to any questions or purported violations of this Code and any statutory ethical standards affecting members, ad hoc members, officers, employees or their immediate family;
 - (2) Counsel in confidence all members, ad hoc members, officers, employees, and their immediate family, who seek advice about ethical behavior;
 - (3) Receive and investigate complaints about possible conflicts of interest and ethics violations;
 - (4) Recommend the dismissal of any complaint found to be without substance;
 - (5) Prepare an investigation report of its findings and recommendations for the Ethics Committee to consider and to recommend such further action be taken by the Board;
 - (6) Record the receipts of gifts or gratuities of any kind, ~~having a value of seventy-five dollars or more,~~ received by any member, ad hoc member, officer, employee or immediate family member, who shall notify the IEP within 48 hours of receipt of such gifts and gratuities.
- (d) Any reports or recommendations made by the IEP must list those ad hoc members who concur or dissent with the report or recommendation.
 - (e) Members, ad hoc members, officers, and employees are required to report possible unethical behavior by a member, ad hoc member, officer, or employee to the IEP and the Authority's Attorney General Counsel. Such a complaint may be filed anonymously and protects the reporting member, ad hoc member, officer, or employee from retaliation. Any form of retaliation is prohibited under this Code and constitutes an ethical violation of this Code.
 - (f) At its discretion, the Ethics Committee may recommend to the Board appropriate disciplinary action, which may include, but is not limited to, a reprimand, suspension or termination. No disciplinary action may be taken without affording the person due process to be heard and to respond to the complaint of unethical behavior. ~~This Such~~ hearing may also be subject to the applicable provisions, if any, of Civil Service Law § 75 or ~~any the~~ applicable provisions, ~~, if any,~~ of a collective bargaining agreement.

Section 3: Records of Proceedings.

The IEP shall keep records of all proceedings, including:

- (a) Names of the persons who disclosed or otherwise were found to have a personal financial interest in connection with an actual or possible conflict of interest, the nature of the personal financial interest, any action taken to determine whether a conflict of interest was present, and the Board's ruling, if any, as to whether a conflict of interest in fact existed.
- (b) Names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken or written rulings made in connection with the matter.

ARTICLE VI FINANCIAL DISCLOSURE STATEMENTS

Section 1: Erie County Board of Ethics.

- (a) Pursuant to Public Authorities Law § 2825 (3) and Article 18 of the General Municipal Law, members, officers, and designated employees must file an annual financial disclosure statement with the Erie County Board of Ethics on or before the fifteenth day of May with respect to the preceding calendar year.
- (b) A member, officer, or designated employee who has timely filed an application for automatic six-month extension with the Internal Revenue Service ("IRS") may file a supplemental statement of financial disclosure seven days after the expiration of the six-month automatic extension with the IRS. This six-month extension does not extend the May 15th deadline but does allow an individual to file a supplemental financial statement, correcting any representations made in the initial financial statement.
- (c) The following members, officers, and employees are required to file annual disclosure statements with the Erie County Board of Ethics: Commissioners, the Secretary of the Authority, the Chief Operating Officer~~Executive Director (or the person designated by the Board as the Chief Operating Officer)~~, ~~the the Deputy Director (or the person designated by the Board as~~ Chief Financial Officer), the Attorney General Counsel, and Executive Engineer.
- (d) The following members, officers, and employees are required to file an Employee Disclosure Form with the Erie County Board of Ethics within 10 days of appointment: Commissioners, the Secretary of the Authority, the ~~Executive Director (or the person designated by the Board as the Chief Operating Officer)~~Chief Operating Officer, ~~the Deputy Director (or the~~

~~person designated by the Board as the~~ Chief Financial Officer), the ~~Attorney General Counsel~~, and Executive Engineer.

Section 2: In-House Financial Disclosure Statements

- (a) The members, ad hoc members, officers, and designated employees are required to file an in-house financial disclosure statement with the Authority's IEP within ten days of appointment or commencement of employment and thereafter annually.
- (b) In-house financial disclosure statements shall be filed by all members, all employees holding an "exempt" job title, and other employees holding certain job titles:

(1) Exempt Job Titles

- i. Associate Attorney;
- ii. Associate Attorney RPT;
- iii. Chief Financial Officer
- ~~iv.~~ Chief Operating Officer
- ~~iii.~~ ~~Attorney;~~
- ~~iv.~~ v. Comptroller;
- vi. Comptroller (Part time);
- ~~v.~~ vii. General Counsel
- ~~vi.~~ ~~Deputy Administrative Director ECWA;~~
- ~~vii.~~ ~~Executive Director;~~
- viii. Executive Engineer;
- ix. Secretary to the Authority.

(2) Designated Job Titles

- i. Administrative Assistant;
- ii. Assistant Business Office Manager;
- iii. Assistant Manager of Accounting Services;
- iv. Automotive Mechanic Crew Chief;
- v. Business Office Manager;
- vi. Cash Manager;
- vii. Chemist and Chief Water Treatment Plant Operator;
- viii. Chief Business Officer Manager-Budget Director;
- ix. Chief Customer Service Representative;
- x. Claims Representative-Risk Manager;
- xi. Construction Inspector;
- xii. Coordinator of Employee Relations;
- xiii. Deputy Associate Attorney;
- xiv. Deputy Director/Chief Financial Officer;

- xv. Director of Administration;
- xvi. Director of Employee Relations;
- xvii. Director of Equal Employment Opportunity (ECWA);
- xviii. Director of Human Resources;
- xix. Director of Purchasing & Inventory Management;
- xx. Director of Operations;
- ~~xx~~-xxi. Director of Water Quality;
- ~~xxi~~-xxii. Distribution Engineer;
- ~~xxii~~-xxiii. Electrical Engineer;
- ~~xxiii~~-xxiv. Employee Benefits Specialist;
- ~~xxiv~~-xxv. Manager of Accounting Services;
- ~~xxv~~-xxvi. Municipal Liaison ECWA (Part time);
- ~~xxvi~~-xxvii. Production Engineer;
- ~~xxvii~~-xxviii. Production Technician;
- ~~xxviii~~-xxix. Security Officer (ECWA);
- ~~xxix~~-xxx. Senior Distribution Engineer;
- ~~xxx~~-xxxi. Senior Micro Technical Support Specialist (ECWA);
- ~~xxxi~~-xxxii. Senior Production Engineer;
- ~~xxxii~~-xxxiii. Senior Stores Clerk; and
- ~~xxxiii~~-xxxiv. Any other position designated by Board resolution.

- (c) The ~~Attorney~~General Counsel or the Independent Ethics Panel may direct any other employee who procures goods and services on the Authority's behalf to file a financial disclosure statement.
- (d) All members, ad hoc members, officers, and designated employees have the ongoing obligation to immediately report any conflict of interest that may arise for themy or for any ofany member of their immediate family membersmay have.
- (e) Members, ad hoc members, officers, and designated employees must annually file an in-house financial disclosure statement with the IEP on or before the fifteenth day of May with respect to the preceding calendar year. In-house financial disclosure statements shall be placed in a sealed envelope and addressed to the Independent Ethics Panel, c/o Legal Department, 295 Main Street, Room 350, Buffalo, New York 14203.
- (f) The Authority shall retain all in-house financial disclosure statements for a period of seven years from the required filing date.

**ERIE COUNTY WATER AUTHORITY
HR Policies/Procedures**

Re:	CODE OF ETHICS & CONFLICTS OF INTEREST POLICY	Policy No.	11.0
<hr/>			
Application:	All Employees	Adopted:	06/16/05
		Amended:	05/11/06
			04/03/08
			05/21/09
			01/26/12
			08/22/13
			03/26/19
			03/24/20

**ARTICLE I
DEFINITIONS**

Section 1: Definitions.

- (a) “Ad hoc member” means a committee member who is not a duly appointed Commissioner and who is appointed to serve as a non-voting committee member pursuant to the Authority’s By-laws.
- (b) “Authority” means the Erie County Water Authority.
- (c) “Board” means the Authority’s Board of Commissioners.
- (d) “Chief Operating Officer” means the individual whose position is defined under the job specifications for Executive Director.
- (e) “Code” means this Code of Ethics and Conflicts of Interest Policy.
- (f) “Employee” includes any Authority employee holding either a full-time position or a regular, part-time position.
- (g) “Ethics Committee” means a standing committee of the Board, as described in Article IV, section 4 of the Authority’s By-Laws.
- (h) “First-degree family members” mean parents, step-parents, children, step-children, and siblings, including half- and step-siblings.
- (i) “General Counsel” means the individual whose position is defined under the job specifications for Attorney.

- (j) “Immediate family” means any first-degree family member related by blood or marriage.
- (k) “Interested Person” means any member, ad hoc member, officer, or employee who has a direct or indirect personal financial interest in any matter pending before the Authority.
- (l) “Independent Ethics Panel” or “IEP” means the entity whose powers are proscribed in Article VI, section 4, sub-section (e) of the Authority’s By-Laws.
- (m) “Members” mean the Authority’s Commissioners, duly appointed pursuant to Public Authorities Law § 1053(1).
- (n) “Officers” mean the Chair, Vice Chair and Treasurer and other officers as may be appointed pursuant to Public Authorities Law § 1053(3), including but not limited to the Secretary to the Authority.
- (o) “Personal financial interest” means a financial interest benefiting a member, ad hoc member, officer, or employee, and/or his/her immediate family.
- (p) “Personal loan” means a loan to the member, ad hoc member, officer, or employee, or member of his/her immediate family.

ARTICLE II CODE OF ETHICS

Section 1: Purpose.

As a public benefit corporation, the Authority must conduct its operations in a manner that best serves the interests of its customers and the general public. Its mission is to provide the Authority’s customers with a plentiful supply of safe, high quality and affordable drinking water through reliable infrastructure.

The Authority expects its members, ad hoc members, officers, and employees to observe high ethical standards of conduct in the performance of their duties, and in compliance with all laws and regulations governing the Authority’s operation. This Code of Ethics shall serve as a guide for official conduct and is intended to enhance the ethical and professional performance of the Authority’s members, ad hoc members, officers, and employees and to preserve the public confidence in the Authority’s mission.

Section 2: Policy.

Members, ad hoc members, officers, and employees shall perform their duties with transparency and without favor, and shall refrain from engaging in outside matters

of personal financial interest or of personal interest, including other employment, that could impair their independence of judgment, or prevent the proper exercise of one's official duties.

This Code is in addition to any and all other laws, restrictions, standards and provisions applicable to the conduct of the Authority's members, ad hoc members, officers, and employees.

Section 3: Standard of Conduct.

- (a) The Authority's members, ad hoc members, officers, and employees shall:
 - (1) Endeavor to perform the duties of their position to the best of their ability and in a spirit of service to all persons and concerns for which the Authority was created;
 - (2) Uphold the high standards of dedicated public service rendered over the years by Authority members, ad hoc members, officers, and employees;
 - (3) Support and encourage fellow employees in the proper execution of their duties;
 - (4) Address any question of conduct or regulation that may occur to either the Authority's General Counsel, or the Chair of the Independent Ethics Panel (IEP).
- (b) Members, ad hoc members, officers, and employees shall conduct themselves at all times in a manner that avoids an appearance that they can be improperly or unduly influenced, that they could be affected by the position of, or relationship with, any other party, or that they are acting in violation of the public trust.
- (c) Members, officers, and employees shall manage all matters within the scope of the Authority's mission independent of any other affiliations or employment. Members, including ad hoc members, officers, and employees shall strive to fulfill their professional responsibility to the Authority without bias and shall support the Authority's mission to the fullest.

Section 4: Prohibited Conduct.

- (a) The Authority's members, ad hoc members, officers, and employees shall not:
 - (1) Directly or indirectly received any compensation or interest, financial or otherwise, or incurred any obligation, which would be

a substantial conflict with the proper discharge of their duties with the Authority;

- (2) Engage in other employment that might impair the independence of their judgment in the execution of their duties with the Authority;
 - (3) Disclose confidential information, acquired in the course of official duties or use such confidential information to further personal financial interests;
 - (4) Directly or indirectly solicit, accept or receive any gift, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment or anything of value.
 - (5) Arrange for the extension of credit or renew an extension of credit in the form of a personal loan from the Authority.
- (b) Unless otherwise permitted by the IEP or the Ethics Committee, no immediate family member of a member, ad hoc member, officer, or employee may directly or indirectly solicit, accept, or receive any other items described in § 4(a)(4) of this Article.
- (c) Unless otherwise permitted by the IEP or the Ethics Committee, no member, ad hoc member, officer, employee nor an immediate family member of a member, ad hoc member, officer, or employee may engage in the following actions:
- (1) Speculating or dealing in equipment, supplies, or materials normally purchased by the Authority;
 - (2) Borrowing money from the Authority, suppliers, significant commercial customers, individuals or firms with whom the Authority does business (loans or mortgages from banks or individuals doing business with the Authority are exempt if the terms are at current rates and the customary collateral for such transactions is provided);
 - (3) Acquiring an interest in real estate in which it is known that the Authority also has a current or anticipated interest;
 - (4) Misusing information to which the individual has access by reason of his or her position, including, but not limited to, disclosing confidential information (of a technical, financial or business nature) to others outside or inside the business (whether or not a consideration is received), or using such information for one's own interest or the interest of an immediate family member;

- (5) Soliciting funds or other items of value from the Authority's vendors, suppliers or consultants for self-interest or for the benefit of any other organization, club or person, whether such other persons or entities are charitable, religious or profit-making;
 - (6) Serving as an officer, director, manager, consultant, volunteer, or an independent contractor with another company or business organization directly or indirectly related to the Authority without specific authorization from the Authority; and
 - (7) Legally representing, or exerting influence in favor of a current or potential vendor, including but not limited to, assisting in the drafting of applications, plans or proposals for Authority approval or submitting such applications, plans or proposals to the Authority.
- (d) The prohibited actions and activities set forth in this section do not encompass every situation that may lead to a conflict of interest.

ARTICLE III CONFLICTS OF INTEREST POLICY

Section 1: Purpose.

- (a) The purpose of this Conflicts of Interest Policy is to protect the Authority's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of a member, ad hoc member, officer, or employee of the Authority. This policy is intended to supplement, but not replace, any applicable state laws governing conflicts of interest applicable to the Authority.
- (b) A conflict of interest is just one example of a violation of ethical conduct. This policy is intended to complement the Authority's Code of Ethics by providing specific procedures to deal with conflicts of interest. To the extent that a matter falls within the scope of both this policy and the Authority's Code of Ethics, the provisions of this Conflicts of Interest Policy shall govern.

Section 2: Prohibition against Conflicts.

- (a) Section 1068 of the New York Public Authorities Law sets forth the following requirements with respect to conflicts of interest:

It shall be a misdemeanor for any of the members of the authority, or any officer, agent, servant or employee thereof, employed or appointed by them to be in any way or manner interested directly or indirectly in the furnishing of work, materials, supplies or labor, or in any contract therefor which the authority is empowered by this act to make.

In the event the Authority discovers a violation of the above provision, the Authority shall conduct an investigation and, if warranted, report the offense to the Inspector General of the State of New York.

- (b) This Conflicts of Interest Policy provides additional guidance regarding actual or potential conflicts of interest, including circumstances not within the scope of Public Authorities Law § 1068.

Section 3: Personal Financial Interest.

- (a) A person has a personal financial interest if the person has, directly or indirectly, through business, investment or family:

- (1) an ownership or investment interest in, or employment with, any entity with which the Authority has a transaction or business arrangement; or
- (2) a compensation arrangement with any entity or individual with which the Authority has a transaction or arrangement; or
- (3) a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Authority is negotiating a transaction or arrangement.

- (b) Compensation includes direct and indirect remuneration as well as gifts or favors that are substantial in nature.

- (c) A personal financial interest is not necessarily a conflict of interest. No conflict of interest exists where a personal financial interest arises solely from an immediate family member that holds a clerical, ministerial or low-level management position with an existing or potential vendor, lacks the power to influence the relationship between the business and the Authority and did not obtain his or her position as a means to influence a member, ad hoc member, officer, or employee of the Authority.

- (d) A person who has a personal financial interest may have a conflict of interest only if the Board determines that a conflict of interest exists pursuant to the enforcement and hearing procedures set forth in Article V, § 2 of this Code.

Section 4: Duty to Report.

- (a) A member, ad hoc member, officer, or employee must immediately report to the Authority's General Counsel or to the IEP Chair gifts of any value, whether in the form of a promise or an offer to give money, services, a loan, or to provide lodgings, meals or entertainment.
- (b) An interested person must disclose the existence of his or her personal financial interest and all material facts surrounding the Financial Interest to the Authority's General Counsel and to the IEP.
- (c) If the Authority's General Counsel or the IEP have reasonable cause to believe an interested person has failed to disclose an actual or possible conflict of interest, they shall inform the interested person of the basis for such belief and afford him/her an opportunity to explain the alleged failure to disclose.
- (d) After disclosure of the personal financial interest, the General Counsel and the IEP will interview the interested person and conduct whatever investigation is warranted by the disclosure.
- (e) After exercising due diligence, the IEP will report its findings and recommendation to the Ethics Committee. The Ethics Committee will review such findings and recommendations. If the Ethics Committee determines further action should be taken, it will forward the matter to the Board.

Section 5: Standard of Review.

- (a) After exercising due diligence, if the Ethics Committee determines the Authority can obtain an equal or more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest, then it will forward the matter to the Board with its recommendation.
- (b) If the Ethics Committee determines an equal or more advantageous transaction or arrangement is not reasonably attainable under circumstances that would not give rise to a conflict of interest, then it will forward the matter for the Board to determine whether the transaction or arrangement should proceed or be terminated. A Board ruling to proceed

shall include a determination that the transaction or arrangement is in the Authority's best interest, is done for its own benefit and is fair and reasonable to the Authority.

ARTICLE IV EMPLOYMENT RESTRICTIONS

Section 1: One-Year Moratorium.

- (a) No person who has served as a member, officer or employee of the Authority shall within a period of one year after the termination of such service or employment appear or practice before the Authority or receive compensation for any services rendered by the member, officer or employee through or on behalf of any person, firm, corporation or association in relation to any case or transaction with respect to which such person was directly concerned, or participated in, during the period of his or her service with the Authority.
- (b) Notwithstanding the foregoing, the one-year moratorium shall not apply to (i) normal business issues arising as a result of the person's status as a water customer of the Authority and (ii) professional services provided by such person pursuant to a written agreement with the Authority, to the extent such agreement is otherwise consistent with this Code of Ethics.

Section 2: Nepotism Policy.

- (a) In no event shall an immediate family member of a member be hired during the term of the member.
- (b) An immediate family member of an ad hoc member, officer, or employee may be considered for a permanent position only if all of the following conditions are met:
 - (1) The ad hoc member, officer, or employee had no role in approving or appointing the immediate family member, pursuant to HR Policy No. 92 (Employment Opportunities Posting and Hiring); and
 - (2) The immediate family member is an appointment from a Civil Service List; or
 - (3) There will be no supervisory relationship between the immediate family member and the related ad hoc member, officer, or employee, and the immediate family member and the related member, ad hoc member, officer, or employee will not work in the same department.

- (c) If current members, ad hoc members, officers, or employees marry, it may be necessary for the Authority to reassign one or both individuals, particularly in the case of close working, or direct supervisory relationships.
- (d) An immediate family member may be considered for summer or temporary employment only if all of the following conditions are met:
 - (1) There will be no supervisory relationship between the immediate family member and the related ad hoc member, officer, or employee; and
 - (2) The immediate family member and the related ad hoc member, officer, or employee will not work in the same department.
- (e) In no event shall a related ad hoc member, officer, or employee participate in any decision to hire, promote, discipline, or discharge an immediate family member.
- (f) The effective date of this section is March 26, 2019. Immediate family members whose date of hire is before May 1, 2018 may continue in their current position or may be promoted despite the provisions set forth in this section.

ARTICLE V IMPLEMENTATION & ENFORCEMENT

Section 1: Distribution.

The Code shall be reviewed annually by the Ethics Committee and the Board and posted on the Authority's website. All members, ad hoc members, officers, and employees shall be given a copy of this Code upon appointment or commencement of employment and thereafter annually.

Section 2: IEP & Ethics Committee.

- (a) The Board designates the ad hoc members of the IEP as its Ethics Officers, who shall report to the Ethics Committee and Board.
- (b) The Ethics Committee shall prepare, review, update, and approve financial disclosure statements to be filed by members, ad hoc members, officers, and designated employees with the IEP.
- (c) The IEP shall have the following duties:

- (1) Interpret and make recommendations with regard to any questions or purported violations of this Code and any statutory ethical standards affecting members, ad hoc members, officers, employees or their immediate family;
 - (2) Counsel in confidence all members, ad hoc members, officers, employees, and their immediate family, who seek advice about ethical behavior;
 - (3) Receive and investigate complaints about possible conflicts of interest and ethics violations;
 - (4) Recommend the dismissal of any complaint found to be without substance;
 - (5) Prepare an investigation report of its findings and recommendations for the Ethics Committee to consider and to recommend such further action be taken by the Board;
 - (6) Record the receipts of gifts or gratuities of any kind, received by any member, ad hoc member, officer, employee or immediate family member, who shall notify the IEP within 48 hours of receipt of such gifts and gratuities.
- (d) Any reports or recommendations made by the IEP must list those ad hoc members who concur or dissent with the report or recommendation.
- (e) Members, ad hoc members, officers, and employees are required to report possible unethical behavior by a member, ad hoc member, officer, or employee to the IEP and the Authority's General Counsel. Such a complaint may be filed anonymously and protects the reporting member, ad hoc member, officer, or employee from retaliation. Any form of retaliation is prohibited under this Code and constitutes an ethical violation of this Code.
- (f) At its discretion, the Ethics Committee may recommend to the Board appropriate disciplinary action, which may include, but is not limited to, a reprimand, suspension or termination. No disciplinary action may be taken without affording the person due process to be heard and to respond to the complaint of unethical behavior. This hearing may also be subject to the applicable provisions, if any, of Civil Service Law § 75 or any applicable provisions of a collective bargaining agreement.

Section 3: Records of Proceedings.

The IEP shall keep records of all proceedings, including:

- (a) Names of the persons who disclosed or otherwise were found to have a personal financial interest in connection with an actual or possible conflict of interest, the nature of the personal financial interest, any action taken to determine whether a conflict of interest was present, and the Board's ruling, if any, as to whether a conflict of interest in fact existed.
- (b) Names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken or written rulings made in connection with the matter.

ARTICLE VI FINANCIAL DISCLOSURE STATEMENTS

Section 1: Erie County Board of Ethics.

- (a) Pursuant to Public Authorities Law § 2825 (3) and Article 18 of the General Municipal Law, members, officers, and designated employees must file an [annual financial disclosure statement](#) with the Erie County Board of Ethics on or before the fifteenth day of May with respect to the preceding calendar year.
- (b) A member, officer, or designated employee who has timely filed an application for automatic six-month extension with the Internal Revenue Service ("IRS") may file a supplemental statement of financial disclosure seven days after the expiration of the six-month automatic extension with the IRS. This six-month extension does not extend the May 15th deadline but does allow an individual to file a supplemental financial statement, correcting any representations made in the initial financial statement.
- (c) The following members, officers, and employees are required to file annual disclosure statements with the Erie County Board of Ethics: Commissioners, the Secretary of the Authority, the Chief Operating Officer, the Chief Financial Officer, the General Counsel, and Executive Engineer.
- (d) The following members, officers, and employees are required to file an [Employee Disclosure](#) Form with the Erie County Board of Ethics within 10 days of appointment: Commissioners, the Secretary of the Authority, the Chief Operating Officer, the Chief Financial Officer, the General Counsel, and Executive Engineer.

Section 2: In-House Financial Disclosure Statements

(a) The members, ad hoc members, officers, and designated employees are required to file an in-house financial disclosure statement with the Authority's IEP within ten days of appointment or commencement of employment and thereafter annually.

(b) In-house financial disclosure statements shall be filed by all members, all employees holding an "exempt" job title, and other employees holding certain job titles:

(1) Exempt Job Titles

- i. Associate Attorney;
- ii. Associate Attorney RPT;
- iii. Chief Financial Officer
- iv. Chief Operating Officer
- v. Comptroller;
- vi. Comptroller (Part time);
- vii. General Counsel
- viii. Executive Engineer;
- ix. Secretary to the Authority.

(2) Designated Job Titles

- i. Administrative Assistant;
- ii. Assistant Business Office Manager;
- iii. Assistant Manager of Accounting Services;
- iv. Automotive Mechanic Crew Chief;
- v. Business Office Manager;
- vi. Cash Manager;
- vii. Chemist and Chief Water Treatment Plant Operator;
- viii. Chief Business Officer Manager-Budget Director;
- ix. Chief Customer Service Representative;
- x. Claims Representative-Risk Manager;
- xi. Construction Inspector;
- xii. Coordinator of Employee Relations;
- xiii. Deputy Associate Attorney;
- xiv. Deputy Director/Chief Financial Officer;
- xv. Director of Administration;
- xvi. Director of Employee Relations;
- xvii. Director of Equal Employment Opportunity (ECWA);
- xviii. Director of Human Resources;
- xix. Director of Purchasing & Inventory Management;
- xx. Director of Operations;
- xxi. Director of Water Quality;
- xxii. Distribution Engineer;
- xxiii. Electrical Engineer;
- xxiv. Employee Benefits Specialist;

- xxv. Manager of Accounting Services;
- xxvi. Municipal Liaison ECWA (Part time);
- xxvii. Production Engineer;
- xxviii. Production Technician;
- xxix. Security Officer (ECWA);
- xxx. Senior Distribution Engineer;
- xxxi. Senior Micro Technical Support Specialist (ECWA);
- xxxii. Senior Production Engineer;
- xxxiii. Senior Stores Clerk; and
- xxxiv. Any other position designated by Board resolution.

- (c) The General Counsel or the Independent Ethics Panel may direct any other employee who procures goods and services on the Authority's behalf to file a financial disclosure statement.
- (d) All members, ad hoc members, officers, and designated employees have the ongoing obligation to immediately report any conflict of interest that may arise for them or for any of their immediate family members.
- (e) Members, ad hoc members, officers, and designated employees must annually file an in-house financial disclosure statement with the IEP on or before the fifteenth day of May with respect to the preceding calendar year. In-house financial disclosure statements shall be placed in a sealed envelope and addressed to the Independent Ethics Panel, c/o Legal Department, 295 Main Street, Room 350, Buffalo, New York 14203.
- (f) The Authority shall retain all in-house financial disclosure statements for a period of seven years from the required filing date.

**ERIE COUNTY WATER AUTHORITY
HR Policies/Procedures**

Re:	WHISTLEBLOWER PROTECTION POLICY	Policy No.	16.0
<hr/>			
Application:	All Employees	Adopted:	04/03/08
		Amended:	01/26/12
			<u>03/24/20</u>

General

The *Erie County Water Authority* Code of Ethics & Conflict of Interest Policy (Policy No. 11) -requires members, ad hoc members, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Authority, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

As part of our ethical responsibility, any alleged corruption, fraud, criminal or unethical activity, misconduct, waste, conflict of interest, intentional reporting of false or misleading information, or abuse of authority engaged in by an Authority Employee (as defined herein) that relates to the Authority shall be reported to the appropriate individuals as set forth herein.

Reporting Responsibility

It is the responsibility of all members, ad hoc members, officers and employees to comply with ~~the~~ Policy No. 11 Code of Ethics & Conflict of Interest Policy and to report violations or suspected violations in accordance with this Whistleblower Protection Policy.

No Retaliation

No member, ad hoc member, officer or employee who in good faith reports a violation of Policy No. 11 Code of Ethics & Conflict of Interest Policy ~~the Code of Ethics~~ shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns within the Authority prior to seeking resolution outside the Authority.

Reporting Violations

All Authority Employees who discover or have knowledge of potential wrongdoing concerning board members, ad hoc members, officers, or employees of this Authority; or a person having business dealings with the Authority; or concerning the Authority itself, shall report such activity in accordance with the following procedures:

- a) The Authority Employee shall disclose any information concerning wrongdoing either orally or in a written report to his or her supervisor, or to ~~the Authority's compliance officer, an ECWA Attorney the Authority's General Counsel, the Director of Human Resources or any member of the Independent Ethics Panel. -or human resources director.~~
- b) All Authority Employees who discover or have knowledge of wrongdoing shall report such wrongdoing in a prompt and timely manner.
- c) The identity of the whistleblower and the substance of his or her allegations will be kept confidential to the best extent possible.
- d) ~~The Any individual to whom the report of~~ potential wrongdoing ~~is reported~~ shall be investigated and handle the claim in a timely and reasonable manner, which may include referring such information to the Authorities Budget Office or an appropriate law enforcement agency where applicable.
- e) Should an Authority Employee believe in good faith that disclosing information within the Authority pursuant to Section 1(a) above would likely subject him or her to adverse personnel action or be wholly ineffective, the Authority Employee may instead disclose the information to the Authorities Budget Office or an appropriate law enforcement agency, if applicable. The Authorities Budget Office's ~~toll-free~~ toll-free number (1-800-560-1770) should be used in such circumstances.

Compliance ~~Officer~~ Officials

~~The Compliance Officer is the Secretary to the Authority. The Authority's Compliance~~
~~The Office of the Secretary and the Independent Ethics Panel with assistance from the~~
~~Authority's Legal Department are~~ Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of ~~the Code of Ethics Policy~~
No. 11 Code of Ethics & Conflict of Interest Policy and will report, on a confidential
basis, all allegations to the ~~Chairman of the Board.~~ Board of Commissioners (the
"Board"). The Board. ~~The Compliance Officer has direct access to the Chairman of the~~
~~Board in these matters.~~

Chairman of the Board

~~The Chairman of the Board will inform other board and staff members as he deems necessary to conduct an appropriate investigation. The Chairman~~ has the authority to provide funds for investigations as required.

Acting in Good Faith

Information concerning potential wrongdoing is disclosed in “good faith” when the individual making the disclosure reasonably believes such information to be true and reasonably believes that it constitutes potential wrongdoing.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Authority's General Counsel, the Director of Human Resources, a Supervisor or any member of the Independent Ethics Panel ~~The Compliance Officer, the ECWA Attorney or Director of Human Resources~~ to whom notice of the reported violation or suspected violation was given will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly ~~investigated~~ investigated, and appropriate corrective action will be taken if warranted by the investigation.

Employees

All board members, and officers and staff employed at the Authority whether full-time, part-time, employed pursuant to contract, employees on probation and temporary employees shall be considered employees for the purposes of applicability of this policy.

**ERIE COUNTY WATER AUTHORITY
HR Policies/Procedures**

Re:	WHISTLEBLOWER PROTECTION POLICY	Policy No.	16.0
<hr/>			
Application:	All Employees	Adopted:	04/03/08
		Amended:	01/26/12 03/24/20

General

The *Erie County Water Authority* Code of Ethics & Conflict of Interest Policy (Policy No. 11) requires members, ad hoc members, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Authority, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

As part of our ethical responsibility, any alleged corruption, fraud, criminal or unethical activity, misconduct, waste, conflict of interest, intentional reporting of false or misleading information, or abuse of authority engaged in by an Authority Employee (as defined herein) that relates to the Authority shall be reported to the appropriate individuals as set forth herein.

Reporting Responsibility

It is the responsibility of all members, ad hoc members, officers and employees to comply with Policy No. 11 Code of Ethics & Conflict of Interest Policy and to report violations or suspected violations in accordance with this Whistleblower Protection Policy.

No Retaliation

No member, ad hoc member, officer or employee who in good faith reports a violation of Policy No. 11 Code of Ethics & Conflict of Interest Policy shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns within the Authority prior to seeking resolution outside the Authority.

Reporting Violations

All Authority Employees who discover or have knowledge of potential wrongdoing concerning board members, ad hoc members, officers, or employees of this Authority; or a person having business dealings with the Authority; or concerning the Authority itself, shall report such activity in accordance with the following procedures:

- a) The Authority Employee shall disclose any information concerning wrongdoing either orally or in a written report to his or her supervisor, or to the Authority's General Counsel, the Director of Human Resources or any member of the Independent Ethics Panel.
- b) All Authority Employees who discover or have knowledge of wrongdoing shall report such wrongdoing in a prompt and timely manner.
- c) The identity of the whistleblower and the substance of his or her allegations will be kept confidential to the best extent possible.
- d) Any report of potential wrongdoing shall be investigated and handle the claim in a timely and reasonable manner, which may include referring such information to the Authorities Budget Office or an appropriate law enforcement agency where applicable.
- e) Should an Authority Employee believe in good faith that disclosing information within the Authority pursuant to Section 1(a) above would likely subject him or her to adverse personnel action or be wholly ineffective, the Authority Employee may instead disclose the information to the Authorities Budget Office or an appropriate law enforcement agency, if applicable. The Authorities Budget Office's toll-free number (1-800-560-1770) should be used in such circumstances.

Compliance Officials

The Office of the Secretary and the Independent Ethics Panel with assistance from the Authority's Legal Department are responsible for investigating and resolving all reported complaints and allegations concerning violations of Policy No. 11 Code of Ethics & Conflict of Interest Policy and will report, on a confidential basis, all allegations to the Board of Commissioners (the "Board"). The Board has the authority to provide funds for investigations as required.

Acting in Good Faith

Information concerning potential wrongdoing is disclosed in "good faith" when the individual making the disclosure reasonably believes such information to be true and reasonably believes that it constitutes potential wrongdoing.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Authority's General Counsel, the Director of Human Resources, a Supervisor or any member of the Independent Ethics Panel to whom notice of the reported violation or suspected violation was given will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Employees

All board members, and officers and staff employed at the Authority whether full-time, part-time, employed pursuant to contract, employees on probation and temporary employees shall be considered employees for the purposes of applicability of this policy.



Erie County Water Authority

295 Main Street • Room 350 • Buffalo, NY 14203-2494
716-849-8484 • Fax 716-849-8463

Independent Ethics Panel (IEP)

FINANCIAL DISCLOSURE STATEMENT

For Calendar Year 20198

Name:

First

Middle

Last

Position:

Business Email:

Business Phone No:

Home Address:

Street

City

Zip

ACKNOWLEDGEMENTS

Please acknowledge the following statements by checking the appropriate boxes.

I hereby acknowledge receiving a copy of Policy No. 11.0, entitled “Code of Ethics & Conflicts of Interest Policy.”

I hereby acknowledge reading ~~and understanding~~ Policy No. 6 (Whistleblower Protection Policy) and Policy 11.0 (Code of Ehtics & Conflicts of Interest Policy).

PLEASE NOTE: If you have any questions regarding Policy No. 11.0, you may email the Independent Ethics Panel (IEP@ecwa.org) or you may contact Associate Attorney Jackie Mattina~~John Gilmour~~, at extension 84532 or by email at jmattinagilmour@ecwa.org.

I hereby acknowledge that I have complied with the provisions of Policy No. 11.0.

If you have not checked each box in this section, please give an explanation on page 6.

STANDARD OF CONDUCT

(ARTICLE II, § 3)

Please affirm the following statements by checking the appropriate boxes.

I affirm that I have endeavored and will endeavor to perform the duties of my position to the best of my ability and in a spirit of service to all persons and concerns for which the Erie County Water Authority (“ECWA”) was created.

Name:

I affirm that I have upheld and will uphold the high standards of dedicated public service rendered over the years by ECWA members, officers and employees.

I affirm that I have supported and encouraged, and will support and encourage, my fellow employees in the proper execution of their duties.

I affirm that ~~when a question of conduct or regulation occurs,~~ I will seek the advice of the ECWA Legal Department Authority's General Counsel, or the members of the Independent Ethics Panel ("IEP") when I have a question of conduct or about the policy.

I affirm ~~that I~~ that I have not engaged in, and will not engage in, any conduct, ~~myself at any~~ all times, ~~which in a manner that avoids any appearance that suggests or demonstrates~~ I could be improperly or unduly, influenced ~~or that I could be affected by the position of, or relationship with, any other party, or that I would ever act into violate my public duty or the violation of the public trust.~~

I affirm and acknowledge my duty to immediately report to the Authority's General Counsel or to the IEP Chair gifts of any value, whether in the form of a promise or an offer to give money, services, a loan, or to provide lodgings, meals or entertainment.

I affirm that I have supported and will support the ECWA mission to the fullest, that I manage all matters within the scope of that mission independent of any other affiliations or employment, and that I strive to fulfill my professional responsibility to ECWA.

If you have not checked each box in this section, please give an explanation on page 7.6.

PROHIBITED CONDUCT

(ARTICLE II, § 4)

Please affirm the following statements by checking appropriate boxes.

PLEASE NOTE: You must review the Vendor List provided to you with this Financial Disclosure Statement before you complete the remaining sections of this form.

I affirm that I have not:

Directly or indirectly ~~Received~~ any ~~any~~ compensation ~~for~~ or ~~have an~~ interest, financial or otherwise, ~~direct or indirect,~~ or incurred any obligation, which would be that is in a substantial conflict with the proper discharge of my duties.

Engaged in other employment that might impair the independence of my judgment in the execution of my ECWA duties.

Name:

Disclosed confidential information, acquired in the course of my official duties or used such confidential information to further a personal financial interest.

PLEASE NOTE: Personal financial interest means a financial interest benefiting you or an immediate family member. An immediate family member means any first-degree family member related by blood or marriage. First-degree family members mean parents, step-parents, children, step-children, and siblings, including half- and step-siblings

Directly or indirectly solicited, or accepted or received any gift, ~~having a value of seventy-five dollars or more, whether in the form of a promise, money, services, a loan, travel, thing or promise, lodging, meals, entertainment, or anything of value. or in any other form under circumstances in which it could reasonably be inferred that the gift was intended as a reward for any official action on my part; excepting entertainment, meals or social invitations that are customary and proper under the circumstances and are wholly in keeping with good business ethics, and do not place me or an immediate family member under obligations.~~

Arranged for the extension of credit or renewed an extension of credit in the form of a personal loan from the Authority.

Unless otherwise permitted by the Independent Ethics Panel or Ethics Committee, I affirm to the best of my knowledge:

No immediate family member has directly or indirectly solicited, accepted, or received any gift, ~~having a value of seventy-five dollars or more, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment, or anything of value. money, service, loan, travel, thing or promise, or in any other form under circumstances in which it could reasonably be inferred that the gift was intended as a reward for any official action on my part; excepting entertainment, meals or social invitations that are customary and proper under the circumstances and are wholly in keeping with good business ethics, and do not place me or an immediate family member under obligations.~~

Neither I nor any member of my immediate family has engaged in speculating or dealing in equipment, supplies or materials normally purchased by ECWA.

Neither I nor any member of my immediate family has borrowed money from ECWA, or any suppliers, significant commercial customers, individuals or firms with whom ECWA does business.

PLEASE NOTE: Loans or mortgages from banks or individuals doing business with the Authority are exempt if the terms are at current rates and the customary collateral for such transactions is provided.

Name:

Neither I nor any member of my immediate family has acquired an interest in real estate in which it is known that ECWA also has a current or anticipated interest.

Neither I nor any member of my immediate family has misused information to which I have had access by reason of my position – such as by disclosing confidential information (of a technical, financial or business nature) to others outside or inside ECWA ~~(whether or not a consideration is received), or using~~ regardless of whether such information was disclosed for my own interest or the interest of an immediate family member.

Neither I nor any member of my immediate family has solicited funds or other items of value from ECWA vendors, suppliers or consultants ~~for me or my immediate family, or to benefit any other organization, club or person, whether such other persons or entities are charitable, religious or profit-making.~~

Neither I nor any member of my immediate family has served as an officer, director or manager with another company or business organization directly or indirectly ~~related to the~~ doing business with ECWA without specific authorization from ECWA.

Neither I nor any member of my immediate family legally represents, or exerts influence in favor of, a current or potential ECWA ~~customers vendor including, but not limited to, or have submitted assisting in the drafting of~~ applications, plans or ~~other compliance proposals information for ECWA approval or submitting such applications, plans or proposals to ECWA. for such a customer to ECWA for approval.~~

If you have not checked each box in this section, please give an explanation on page 76.

**CONFLICTS OF INTEREST
(ARTICLE III § 3)**

PLEASE NOTE:

- The questions in this CONFLICT OF INTEREST section do not relate to a domestic or commercial ECWA water customer.
- Answer each question to the best of your knowledge after making a diligent inquiry of immediate family members.
- Any unanswered questions, will be treated as if you answered “Yes.”

Please check “Yes” or “No” to the following questions

YES NO

Do you or an immediate family member ~~directly or indirectly, through business or investment,~~ have any ownership or investment interest in, or

~~employment with, an y~~ entity with which ECWA does ~~done any~~ business or has entered into a -a transaction and/or or-business arrangement?

Are you or an immediate family member an officer, director, manager, consultant, volunteer, or an independent contractor of any entity or individual having business dealings with ECWA or having engaged in a transaction and/or business arrangement with ECWA?

~~Do yo~~Do you or an immediate family member ~~directly or indirectly, through business or investment have a compensation arrangement with~~ hold any position with an entity or individual, doing business with ECWA or otherwise ~~any entity or individual with which ECWA does done any business or has engaged in a transaction and/or business arrangement with ECWA~~a transaction or arrangement?

Have you or an immediate family member accepted compensation from an entity with which, or individual with whom, ECWA has done any business or has engaged in a transaction and/or business arrangement?

Do you or an immediate family member ~~directly or indirectly, through business or investment,~~ have a potential ownership or investment interest ~~in, or compensation arrangement with, with any entity or individual, with which ECWA is negotiating a transaction or and/or business arrangement with ECWA?~~

Do you or an immediate family member, through business or investment, have pending compensation arrangement with an entity or individual, negotiating a transaction and/or business arrangement with ECWA?

PLEASE NOTE:

- Compensation includes direct and indirect remuneration as well as gifts or favors that are -substantial in nature.
- A personal financial interest is not necessarily a conflict of interest. No conflict of interest exists where a personal financial interest arises solely from an immediate family member that holds a clerical, ministerial or low-level management position with an existing or potential vendor, lacks the power to influence the relationship between the business and the Authority and did not obtain his or her position as a means to influence a member, ad hoc member, officer, or employee of the Authority.
- A person who has a personal financial interest may have a conflict of interest only if the Board determines that a conflict of interest exists pursuant to the enforcement and hearing procedures set forth in Article V, §

2 of ~~Policy of Policy~~ No. 11.0.

If you have answered “Yes” or failed to answer any question in this section, please give an explanation on page 7.

IF YOU ARE AN ATTORNEY LICENSED TO PRACTICE LAW IN THE STATE OF NEW YORK, PLEASE ANSWER THE FOLLOWING QUESTIONS:

YES NO

If you have a private practice, do you represent any county, city, town or village (i.e. municipal corporation) or any Indian nation or tribe?

If yes, please list which municipal corporation(s) and/or Indian nation(s) or tribe(s) you represent:

NEPOTISM POLICY
(ARTICLE IV§ 2)

Please check "Yes" or "No" to the following questions

YES **NO**

Have any of your immediate family members worked for ECWA during the 20198 calendar year?

If you answered "Yes," please answer the following:

YES **NO**

Did you have any role in approving or appointing an immediate family member to a position with ECWA?

Was the immediate family member appointed from a Civil Service list?

Do you directly supervise an immediate family member?

Is an immediate family member supervised by someone over whom you have direct or indirect supervision?

Does an immediate family member work in the same department as you?

Please list the names of any immediate family member who works or worked for ECWA in calendar year 20198.

ADDITIONAL INFORMATION

If necessary, you may attach additional pages

Acknowledgement Section:

Standard of Conduct Section:

Prohibited Conduct Section:

Conflicts of Interest Section:

ERIE COUNTY BOARD OF ETHICS

(ARTICLE VI§ 1)

Please check "Yes" or "No" to the following questions

YES NO

Pursuant to the Article VI of the ECWA Code of Ethics & Conflict of Interest Policy, Are you required to file an annual financial disclosure statement with the Erie County Board of Ethics?

Have you filed with the Erie County Board of Ethics the Annual Statement of Financial Disclosure for the County of Erie for Calendar Year 20198?

Name:

Please indicate the date you filed:

For your convenience, this Financial Disclosure Statement may be filled out electronically but **requires an original signature for submission.** Please submit your statement in a sealed envelope to the Independent Ethics Panel, c/o Legal Department, 295 Main Street, Room 350, Buffalo, New York 14203. Your name must be placed on the outside of the sealed envelope. All envelopes will be time-stamped when received. Envelopes will be open by members of the Independent Ethics Panel.

Return this Financial Disclosure Statement by May 15, 20~~2018~~²⁰¹⁹.

I affirm, under penalty of perjury, all information in this financial disclosure statement is true to the best of my knowledge.

Date

Signature

For IEP Use Only

Reviewed by: _____ Date Reviewed: _____ Needs Follow-Up: _____ Date Approved by IEP: _____



Erie County Water Authority

295 Main Street • Room 350 • Buffalo, NY 14203-2494
716-849-8484 • Fax 716-849-8463

Independent Ethics Panel (IEP)

FINANCIAL DISCLOSURE STATEMENT For Calendar Year 2019

Name:

First

Middle

Last

Position:

Business Email:

Business Phone No:

Home Address:

Street

City

Zip

ACKNOWLEDGEMENTS

Please acknowledge the following statements by checking the appropriate boxes.

I hereby acknowledge receiving a copy of Policy No. 11.0, entitled “Code of Ethics & Conflicts of Interest Policy.”

I hereby acknowledge reading Policy No. 6 (Whistleblower Protection Policy) and Policy 11.0 (Code of Ehtics & Conflicts of Interest Policy).

PLEASE NOTE: If you have any questions regarding Policy No. 11.0, you may email the Independent Ethics Panel (IEP@ecwa.org) or you may contact Associate Attorney Jackie Mattina, at extension 8452 or by email at jmattina@ecwa.org.

I hereby acknowledge that I have complied with the provisions of Policy No. 11.0.

If you have not checked each box in this section, please give an explanation on page 6.

STANDARD OF CONDUCT (ARTICLE II, § 3)

Please affirm the following statements by checking the appropriate boxes.

I affirm that I have endeavored and will endeavor to perform the duties of my position to the best of my ability and in a spirit of service to all persons and concerns for which the Erie County Water Authority (“ECWA”) was created.

Name:

I affirm that I have upheld and will uphold the high standards of dedicated public service rendered over the years by ECWA members, officers and employees.

I affirm that I have supported and encouraged, and will support and encourage, my fellow employees in the proper execution of their duties.

I affirm that I will seek the advice of the Authority's General Counsel, or the members of the Independent Ethics Panel ("IEP") when I have a question of conduct or about the policy.

I affirm that I have not engaged in, and will not engage in, any conduct, at any time, which suggests or demonstrates I could be improperly or unduly, influenced to violate my public duty or the public trust.

I affirm and acknowledge my duty to immediately report to the Authority's General Counsel or to the IEP Chair gifts of any value, whether in the form of a promise or an offer to give money, services, a loan, or to provide lodgings, meals or entertainment.

I affirm that I have supported and will support the ECWA mission to the fullest, that I manage all matters within the scope of that mission independent of any other affiliations or employment, and that I strive to fulfill my professional responsibility to ECWA.

If you have not checked each box in this section, please give an explanation on page 7.

PROHIBITED CONDUCT

(ARTICLE II, § 4)

Please affirm the following statements by checking appropriate boxes.

PLEASE NOTE: You must review the Vendor List provided to you with this Financial Disclosure Statement before you complete the remaining sections of this form.

I affirm that I have **not**:

Directly or indirectly received any compensation or interest, financial or otherwise, or incurred any obligation, which would be a substantial conflict with the proper discharge of my duties.

Engaged in other employment that might impair the independence of my judgment in the execution of my ECWA duties.

Disclosed confidential information, acquired in the course of my official duties or used such confidential information to further a personal financial interest.

Name:

PLEASE NOTE: Personal financial interest means a financial interest benefiting you or an immediate family member. An immediate family member means any first-degree family member related by blood or marriage. First-degree family members mean parents, step-parents, children, step-children, and siblings, including half- and step-siblings

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Unless otherwise permitted by the Independent Ethics Panel or Ethics Committee, I affirm to the best of my knowledge:

No immediate family member has directly or indirectly solicited, accepted, or received any gift, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment, or anything of value.

Neither I nor any member of my immediate family has engaged in speculating or dealing in equipment, supplies or materials normally purchased by ECWA.

Neither I nor any member of my immediate family has borrowed money from ECWA, or any suppliers, significant commercial customers, individuals or firms with whom ECWA does business.

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Neither I nor any member of my immediate family has solicited funds or other items of value from ECWA vendors, suppliers or consultants.

Neither I nor any member of my immediate family has served as an officer, director or manager with another company or business organization directly or indirectly doing business with ECWA without specific authorization from ECWA.

Neither I nor any member of my immediate family legally represents, or exerts influence in favor of, a current or potential ECWA vendor including, but not limited to, assisting in the drafting of applications, plans or proposals for ECWA approval or submitting such applications, plans or proposals to ECWA.

If you have not checked each box in this section, please give an explanation on page 7.

**CONFLICTS OF INTEREST
(ARTICLE III § 3)**

PLEASE NOTE:

- The questions in this CONFLICT OF INTEREST section do not relate to a domestic or commercial ECWA water customer.
- Answer each question to the best of your knowledge after making a diligent inquiry of immediate family members.
- Any unanswered questions, will be treated as if you answered “Yes.”

Please check “Yes” or “No” to the following questions

YES NO

Do you or an immediate family member, have any ownership or investment interest in an entity with which ECWA does business or has entered into a transaction and/or business arrangement?

Are you or an immediate family member an officer, director, manager, consultant, volunteer, or an independent contractor of any entity or individual having business dealings with ECWA or having engaged in a transaction and/or business arrangement with ECWA?

Do you or an immediate family member hold any position with an entity or individual, doing business with ECWA or otherwise engaged in a transaction and/or business arrangement with ECWA?

Have you or an immediate family member accepted compensation from an entity with which, or individual with whom, ECWA has done any business or has engaged in a transaction and/or business arrangement?

Do you or an immediate family member, through business or investment, have a potential ownership or investment interest with an entity or individual, negotiating a transaction and/or business arrangement with ECWA?

Do you or an immediate family member, through business or investment, have pending compensation arrangement with an entity or individual, negotiating a transaction and/or business arrangement with ECWA?

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- A person who has a personal financial interest may have a conflict of interest only if the Board determines that a conflict of interest exists pursuant to the enforcement and hearing procedures set forth in Article V, § 2 of Policy No. 11.0.

If you have answered “Yes” or failed to answer any question in this section, please give an explanation on page 7.

IF YOU ARE AN ATTORNEY LICENSED TO PRACTICE LAW IN THE STATE OF NEW YORK, PLEASE ANSWER THE FOLLOWING QUESTIONS:

YES NO

If you have a private practice, do you represent any county, city, town or village (i.e. municipal corporation) or any Indian nation or tribe?

If yes, please list which municipal corporation(s) and/or Indian nation(s) or tribe(s) you represent:

**NEPOTISM POLICY
(ARTICLE IV § 2)**

Please check “Yes” or “No” to the following questions

YES NO

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YES NO

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Is an immediate family member supervised by someone over whom you have direct or indirect supervision?

Does an immediate family member work in the same department as you?

Please list the names of any immediate family member who works or worked for ECWA in calendar year 2019.

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If necessary, you may attach additional pages

Acknowledgement Section:

Standard of Conduct Section:

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Conflicts of Interest Section:

ERIE COUNTY BOARD OF ETHICS

(ARTICLE VI§ 1)

Please check "Yes" or "No" to the following questions

YES NO

Pursuant to the Article VI of the ECWA Code of Ethics & Conflict of Interest Policy, are you required to file an annual financial disclosure statement with the Erie County Board of Ethics?

Have you filed with the Erie County Board of Ethics the Annual Statement of Financial Disclosure for the County of Erie for Calendar Year 2019?

Please indicate the date you filed:

For your convenience, this Financial Disclosure Statement may be filled out electronically but **requires an original signature for submission.** Please submit your statement in a sealed envelope to the Independent Ethics Panel, c/o

Name:

Legal Department, 295 Main Street, Room 350, Buffalo, New York 14203. Your name must be placed on the outside of the sealed envelope. All envelopes will be time-stamped when received. Envelopes will be open by members of the Independent Ethics Panel.

Return this Financial Disclosure Statement by May 15, 2020.

I affirm, under penalty of perjury, all information in this financial disclosure statement is true to the best of my knowledge.

Date

Signature

For IEP Use Only

Reviewed by: _____ Date Reviewed: _____ Needs Follow-Up: _____ Date Approved by IEP: _____

Acknowledgement

I, _____, received the letter, dated March 31, 2020 from the Independent Ethics Panel (IEP), along with a copy of the 2019 ECWA Financial Disclosure Statement, Policy No. 6 (Whistleblower Protection Policy, and Policy No. 11 (Code of Ethics & Conflicts of Interest Policy).

I affirm, under penalty of perjury, that I have reviewed and read the materials provided to me with this Acknowledgement.

Employee Signature

Date

Print Name: _____

VENDOR ANALYSIS - PAID IN 2019

2019 VENDOR LIST

VEN NO	VENDOR NAME	PAID	Y/N
V7867	716 SITE CONTRACTING, INC.	2,311,159.15	Y
V0095	ABC LOCKSMITH SERVICE, INC	693.42	Y
V8732	ABRAXIS, LLC	1,650.00	Y
V3291	ABSOLUTE STANDARDS INC	1,100.00	Y
V3051	ACI CONTROLS, INC	11,267.80	Y
V0067	ACME BEARINGS CORP	2,508.90	Y
V3389	AD SPECIALTY SOLUTIONS LLC	515.50	Y
V3216	ADMAR SUPPLY CO INC	19,192.07	Y
V8736	ADVANCE AUTO PARTS PROFESSIONAL	14,741.10	Y
V3143	AMERICAN LUBRICANTS INC	7,290.75	Y
V3219	AMERICAN ROCK SALT CO LLC	5,249.78	Y
V7578	AMERICAN SHORING INC	5,752.50	Y
V3331	AMREX CHEMICAL CO INC	1,347.50	Y
V3277	AMSTAR OF WESTERN NEW YORK,INC.	339,868.50	Y
V3441	AP PROFESSIONALS OF WNY, LLC	35,000.00	Y
V0182	APPLIED INDUSTRIAL TECHNOLOGIES INC	850.40	Y
V3332	APPLIED SPECIALTIES INC	59,385.39	Y
V3407	ARCADIS U.S.,INC.	154,521.00	Y
V3172	ASHLAND PEST CONTROL INC	2,525.00	Y
V3238	AUTOMATECH INC - GE FANUC	45,400.77	Y
V3093	AUTOMATED BUSINESS FORMS	797.61	Y
V3041	AUTOMATIC POWER INC	1,243.95	Y
V3278	AVAYA INC	39,126.96	Y
V0102	A-VERDI LLC	1,680.00	Y
V3418	AVIAT US, INC.	245,627.35	Y
V3971	B&H	2,070.24	Y
V3959	BARCLAY DAMON, LLP	15,071.40	Y
V0289	BASIL FORD INC (QUICK LANE TIRE & AUTO)	20,378.29	Y
V0111	BEE PUBLICATIONS, INC	3,603.00	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V3864	BENTLEY SYSTEMS INC	6,652.80	Y
V3962	BIOWEB, LLC	640.28	Y
V3875	BIRD TECHNOLOGIES GROUP	1,651.29	Y
V3699	BLACKBURN MANUFACTURING CO	3,948.20	Y
V0155	BLAIR SUPPLY CORPORATION	38,859.94	Y
V3814	BOBCAT COMPANY	8,202.10	Y
V3982	BRENNTAG LUBRICANTS NORTHEAST	4,259.37	Y
V0191	BUFFALO ENVELOPE INC	704.50	Y
V8612	C R M CONTRACTING INC	240,798.44	Y
V9707	C S BUSINESS SYSTEMS, INC	428,331.63	Y
V2824	CALAMP WIRELESS NETWORKS CORP.	25,572.52	Y
V8432	CALERO SOFTWARE, LLC	832.36	Y
V2597	CALKINS TECHNICAL PRODUCTS INC	12,716.11	Y
V2534	CAMPIONE SAFETY	3,036.00	Y
V8641	CARUS CORPORATION	46,179.33	Y
V2532	CDW GOVERNMENT	96,264.55	Y
V2821	CHA CONSULTING, INC	251,521.40	Y
V2817	CHARLES CIEHOMSKI WESTERN NEW YORK WA'	11,850.00	Y
V0494	CHILD & FAMILY SERVICES	3,389.59	Y
V0426	CHUDY PAPER COMPANY,INC.	3,422.08	Y
V2604	CINTAS CORPORATION - SAFETY TRAINING	24,885.91	Y
V2811	CLARK PATTERSON LEE	174,725.00	Y
V8814	CLEARVIEW MAINTENANCE CORP	3,240.00	Y
V0302	CMH COMPANY INC	1,332,222.96	Y
V8786	COMMON HEADQUARTERS	1,490.00	Y
V2816	CONSTRUCTION CRAFT ACADEMY	2,050.00	Y
V2835	CONTROLCHEM CANADA LTD.	80,794.19	Y
V7962	CORE & MAIN LP	64,824.16	Y
V0331	CORPORATE SCREENING & INVESTIGATIVE GRP	2,929.70	Y
V0346	CORR DISTRIBUTORS INC	5,934.20	Y
V2602	CORROSION PRODUCTS & EQUIPMENT- CPE	33,577.00	Y
V2861	CORRTECH INC.	4,750.00	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V0347	COUNTY LINE STONE CO INC	470,695.52	Y
V8619	CROSS CONNECTION CONTROL FOUNDATION, IN	3,160.00	Y
V8631	CSEA EMPLOYEE BENEFIT FUND	121,756.19	Y
V3797	D V BROWN & ASSOCIATES INC	4,100.00	Y
V0527	DBM CONTROL DISTRIBUTORS INC	2,775.00	Y
V0528	DELACY FORD INC	3,906.98	Y
V4828	DELFT PRINTING INC	2,192.56	Y
V4457	DETECT TANK SERVICES, LLC	1,600.00	Y
V0520	DIVAL SAFETY EQUIPMENT INC	46,541.18	Y
V4456	DJM CONTRACTING, INC.	322,799.62	Y
V4821	DLT SOLUTIONS, LLC	7,105.00	Y
V0508	DOBMEIER JANITOR SUPPLY INC	2,324.66	Y
V4628	DOUBLE EAGLE EMBROIDERY	1,104.00	Y
V2221	DOWD BATTERY CO INC	4,081.00	Y
V4844	DRESCHER & MALECKI LLP	40,436.00	Y
V4459	DWYER INSTRUMENTS INC.	837.40	Y
V0700	E & R GENERAL CONSTRUCTION INC	787,361.30	Y
V2405	E 3 COMMUNICATIONS INC	73,998.75	Y
V2134	E.H.WACHS COMPANY	8,516.88	Y
V2422	EASTCOM ASSOCIATES INC	3,324.00	Y
V5187	EATON CORPORATION	16,783.45	Y
V0601	EATON OFFICE SUPPLY CO INC	769.50	Y
V0609	ECOLOGY AND ENVIRONMENT INC	63,288.75	Y
V6576	ED SHULTS FORD	32,459.66	Y
V5159	EDS TIRE SERVICE INC	1,526.12	Y
V5189	EL-DON BATTERY POST INC	1,446.08	Y
V1903	ELLICOTT GROUP LLC	257,677.34	Y
V2472	EMA, INC	41,802.73	Y
V0615	ERB CO INC	3,354.78	Y
V5158	ERDMAN ANTHONY AND ASSOCIATES INC	62,099.91	Y
V2421	ERIE COTTON PRODUCTS, INC.	1,280.00	Y
V6880	EUROFINS EATON ANALYTICAL, INC.	800.00	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V2498	EVERBRIDGE INC.	43,618.29	Y
V4121	EVERETT J PRESCOTT INC	66,070.40	Y
V8108	EVOQUA WATER TECHNOLOGIES LLC(*USE #17)	4,451.96	Y
V8310	F.W. WEBB CO. -WATERWORKS	12,724.81	Y
V0316	FAIRBANKS SCALES, INC.	987.50	Y
V0786	FASTENAL COMPANY	76,939.62	Y
V8012	FCX PERFORMANCE	41,954.96	Y
V5274	FERGUSON ELECTRIC CONSTRUCTION CO INC	3,650,356.19	Y
V5279	FERGUSON ELECTRIC SERVICE CO INC	757,281.54	Y
V5350	FERRELLGAS LP	1,290.48	Y
V3063	FERRY INC	2,889.26	Y
V0708	FISHER SCIENTIFIC COMPANY	11,932.47	Y
V1318	FIVE STAR EQUIPMENT INC	2,078.21	Y
V2015	FLEETPRIDE(UNIVERSAL JOINT SALES CO INC)	5,157.41	Y
V0721	FLUID KINETICS INC	5,518.00	Y
V5228	FM COMMUNICATIONS INC	1,584.00	Y
V5369	FM OFFICE EXPRESS, INC	604.00	Y
V0723	FREDERICK MACHINE REPAIR INC	188,898.51	Y
V5376	FREY HEAVY DUTY	508.40	Y
V5427	GALLAGHER PRINTING INC	522.00	Y
V5593	GARLAND/DBS INC.	151,369.90	Y
V5588	GEITER DONE OF WNY, INC.	180,644.81	Y
V5702	GENESEE VALLEY FORD LLC	198,904.52	Y
V0856	GENUINE PARTS COMPANY	9,683.01	Y
V2842	GETGO, INC.	2,709.74	Y
V5577	GHD CONSULTING ENGINEERS, LLC	147,100.00	Y
V5445	GLOBAL CONTRACTING & PAINTING INC	17,259.66	Y
V5596	GLOBAL KNOWLEDGE TRAINING, LLC	3,510.25	Y
V5697	GLOBAL SIGNAL ACQUISITIONS LLC	8,281.60	Y
V0838	GOODYEAR SERVICE STORES-*USE ADDRESS #4	33,168.39	Y
V5520	GOVERNMENT SCIENTIFIC SOURCE INC	1,314.78	Y
V5698	GOVSPEND	4,000.00	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V6066	GP JAGER, INC	7,445.93	Y
V0819	GRAYBAR ELECTRIC COMPANY INC	54,067.36	Y
V5536	GREENMAN - PEDERSON,INC	268,369.71	Y
V0817	GROVE ROOFING SERVICES INC	38,908.36	Y
V5597	GUTERMANN, INC.	24,029.00	Y
V7970	H & K SERVICES INC	150,386.28	Y
V0934	HACH COMPANY	464,699.68	Y
V7928	HAMBURG OVERHEAD DOOR INC	2,900.00	Y
V7042	HANES SUPPLY INC	4,081.80	Y
V7945	HARRINGTON PLASTICS	3,060.32	Y
V7977	HARTER SECREST & EMERY LLP	12,011.19	Y
V7045	HEALTHWORKS-WNY LLP	29,676.59	Y
V0935	HEAVY DUTY PARTS INC	5,116.28	Y
V3054	HELPSYSTEMS, LLC	6,834.04	Y
V4015	HENRY PRATT COMPANY	17,880.00	Y
V7987	HILTON ARLINGTON & TOWERS	1,070.20	Y
V0962	HI-TECH SERVICES INC	356,912.00	Y
V7067	HOHL INDUSTRIAL SERVICES INC	15,000.00	Y
V7041	HSQ TECHNOLOGY	3,750.00	Y
V0977	HYDROVERGE	49,020.84	Y
V5822	IDEXX DISTRIBUTION INC	58,636.73	Y
V5929	INDUSTRIAL SCIENTIFIC	21,741.96	Y
V5915	INFORMATION MANAGEMENT SERVICES	5,130.00	Y
V5938	INGENIOUS INC.	39,492.76	Y
V5876	INNER-TITE CORP	4,740.00	Y
V5928	INTERLINK NETWORK SYSTEM, INC.	3,750.00	Y
V1009	IRISH CARBONIC & WELDING CORP	3,479.27	Y
V5905	IRON MOUNTAIN INFORMATION MANAGEMENT	18,866.64	Y
V5936	IRTH SOLUTIONS, LLC	11,318.50	Y
V5927	ISAFETY CO.	3,570.00	Y
V6069	JACKSON WELDING & GAS PRODUCTS	759.25	Y
V6080	JAMES TREE SERVICE	2,000.00	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V6021	JEM ENTERPRISES	9,136.73	Y
V1060	JET ACTION INC	1,142.50	Y
V0255	JOE BASIL CHEVROLET INC	4,255.51	Y
V6977	JOHN PERCY SERVICES, LLC	742.60	Y
V4931	JOHNSON CONTROLS	281,224.95	Y
V1062	JOHNSON CONTROLS, INC	165,037.89	Y
V1084	JOHNSTONE SUPPLY	1,014.72	Y
V1053	JONES CHEMICALS INC	551,603.70	Y
V1101	K & S CONTRACTORS SUPPLY INC	260,439.39	Y
V6191	K J ELECTRIC	1,530.00	Y
V1102	KAMAN AUTOMATION INC.	467,824.84	Y
V6126	KAMINSKI & SONS TRUCK EQUIPMENT	9,728.85	Y
V1121	KANDEY COMPANY INC	656,078.20	Y
V6209	KEMIRA WATER SOLUTIONS INC	413,496.24	Y
V6205	KENWORTH NORTHEAST GROUP, INC.	133,670.79	Y
V6190	KINSLEY POWER SYSTEMS	35,219.49	Y
V6174	KIRK KEY INTERLOCK COMPANY	3,016.55	Y
V6179	KLEIN STEEL SERVICE, INC.	2,132.00	Y
V6114	KOESTER ASSOCIATES INC	169,758.00	Y
V6162	KRAVITCH MACHINE COMPANY	2,398.12	Y
V6198	KRONOS, INC.	3,941.58	Y
V1138	KURK FUEL COMPANY	106,693.34	Y
V6449	LABOR-MANAGEMENT HEALTHCARE FUND	5,217,689.01	Y
V6401	LAKELANDS CONCRETE PRODUCTS INC	28,790.00	Y
V1221	LAWLEY SERVICE INC	1,068,621.83	Y
V6245	LAWSON PRODUCTS, INC.	2,154.84	Y
V6493	LEDGE CREEK DEVELOPMENT INC	2,286,376.01	Y
V6486	LENOVO GLOBAL TECHNOLOGY (UNITED STATE	10,023.75	Y
V6335	LEXMARK INTERNATIONAL INC	3,014.31	Y
V6413	LIFTECH EQUIPMENT COMPANIES, INC.	68,054.64	Y
V1214	LOCK CITY SUPPLY INC	297,328.71	Y
V6404	LUDECA INC	8,343.07	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V6752	M K S PLUMBING CORP	4,953.79	Y
V6961	MAILFINANCE, INC.	1,065.00	Y
V2832	MARK CERRONE INC	457,603.80	Y
V2207	MARS COMPANY	1,262.21	Y
V6990	MASIELLO, MARTUCCI, CALABRESE & ASSOC.	55,322.19	Y
V6513	MATRIX IMAGING SOLUTIONS, INC	103,744.42	Y
V6804	MCCARTHY TIRE SERVICE CO.	5,004.98	Y
V6995	MCCROMETER INC.	3,276.34	Y
V6876	MICROBAC LABORATORIES INC	2,448.00	Y
V6966	MICROSOFT AZURE	45,317.36	Y
V6811	MIDWAY INDUSTRIAL SUPPLY	2,940.00	Y
V4908	MILTON-CAT	29,378.28	Y
V6666	MODERN DISPOSAL SERVICES INC	85,207.84	Y
V6645	MOLLENBERG - BETZ INC	328,820.12	Y
V6864	MSC INDUSTRIAL SUPPLY CO INC	39,390.16	Y
V5995	MUTUAL OF OMAHA	27,115.19	Y
V8023	NATIONAL BUSINESS INSTITUTE INC	2,974.00	Y
V1049	NATIONAL INDUSTRIES FOR THE BLIND	659.11	Y
V8506	NATIONAL OVERHEAD DOOR INC	22,578.35	Y
V4570	NATURE'S WAY ENVIRONMENTAL	4,000.00	Y
V1403	NEPTUNE TECHNOLOGY GROUP INC	1,348,508.07	Y
V4512	NEW FRONTIER EXCAVATING & PAVING, INC	1,618,438.19	Y
V1445	NORTH STAR SUPPLY CO INC	1,220.91	Y
V1424	NUSSBAUMER & CLARKE INC	531,168.96	Y
V0201	NUWAY BUFFALO	2,267.97	Y
V5600	OBRIEN & GERE ENGINEERS INC	45,550.00	Y
V5606	OCCUPATIONAL SAFETY & ENVIRONMENTAL AS	2,550.00	Y
V5667	OFFICE DEPOT INC	714.93	Y
V2417	PACE ANALYTICAL SERVICES INC	10,203.00	Y
V6981	P-A-M CONSULTING SERVICE, INC.	685.00	Y
V6979	PCM GOV INC.	2,674.40	Y
V4068	PENN DETROIT DIESEL	1,147.10	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V7175	PENN POWER SYSTEMS	18,303.00	Y
V1610	PERTECH INC	45,696.16	Y
V8708	PETER M. VITO AND ASSOCIATES	4,773.30	Y
V8361	PHENOVA INC	18,985.00	Y
V1586	PHILIPPS BROS SUPPLY INC	39,178.94	Y
V7154	PHILLIPS LYTLE, LLP	531.00	Y
V7170	PIONEER PUMP SYSTEMS INC	14,358.10	Y
V1557	PITNEY BOWES, INC.	20,717.91	Y
V1559	POLLARDWATER	10,240.24	Y
V1560	POOLEY, INC.	1,906.68	Y
V1326	PRAXAIR DISTRIBUTION INC	3,216.29	Y
V7189	PRECISION SCALE	4,650.88	Y
V6947	PRO BUSINESS SUPPLY	3,411.00	Y
V6952	PRO-FLEX ADMINISTRATORS, LLC	1,572.00	Y
V4551	QUALITY HYDRANT CO	1,650.00	Y
V7870	QUALITY PC TRAINING	1,240.00	Y
V8114	R.B. U'REN EQUIPMENT INC.	18,150.00	Y
V7213	RAF SUPPLY INC	3,691.20	Y
V7319	RAZ-LEE SECURITY	3,600.00	Y
V5046	RED WING SHOES	5,901.86	Y
V7133	REGIONAL INTERNATIONAL OF WNY INC	48,522.51	Y
V7249	REXEL INC (FORMERLY WEHLE ELECTRIC)	692.02	Y
V1014	RICOH PRODUCTION PRINT SOLUTIONS LLC	24,739.12	Y
V8096	RICOH USA INC(FORMERLY IKON OFFICE)	13,528.58	Y
V5055	RITEC	67,224.00	Y
V1668	RIVERSIDE CHEMICAL COMPANY INC	8,972.20	Y
V5042	ROSEMOUNT INC	32,445.45	Y
V1671	ROSS VALVE MANUFACTURING CO INC	13,967.57	Y
V7320	ROUTE 5 BOOTS & SHOES	5,623.70	Y
V1683	RUSINIAKS SERVICE INC	2,372.25	Y
V7286	RUSSO DEVELOPMENT INC	1,956,964.36	Y
V7886	SAFCO PRODUCTS CO.	779.41	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V7854	SAFE DRIVER ACADEMY	3,040.00	Y
V4998	SAFELITE GLASS CORP	1,240.31	Y
V7547	SAFETY-KLEEN SYSTEMS INC	922.66	Y
V4988	SAF-GARD SAFETY SHOE COMPANY	6,159.76	Y
V1818	SCHUELE PAINT COMPANY INC	6,996.00	Y
V1791	SEALING DEVICES INC	889.98	Y
V7856	SEON SYSTEM SALES, INC.	5,500.00	Y
V4992	SHI INTERNATIONAL CORP	18,006.87	Y
V8179	SIEMENS INDUSTRY INC	97,016.89	Y
V1858	SIEWERT EQUIPMENT COMPANY, INC	13,672.15	Y
V4963	SIMMERS CRANE DESIGN & SERVICES CO.	48,218.96	Y
V4968	SIRIUS COMPUTER SOLUTIONS INC	67,036.70	Y
V7864	SKYWORKS, LLC	7,443.50	Y
V4953	SLACK CHEMICAL COMPANY INC	9,832.98	Y
V1763	SNAP-ON TOOLS CORPORATION	2,134.10	Y
V0348	SOLVAY CHEMICALS INC	53,768.23	Y
V7873	SOUTHTOWN SUPPLY INC.	13,655.00	Y
V0287	STANLEY CONVERGENT SECURITY SOLUTION IN	56,194.38	Y
V7833	STC CONSTRUCTION INC	173,302.90	Y
V7816	STEELCASE	46,574.94	Y
V7894	STEPHAN GREEN ENTERPRISES INC	11,789.01	Y
V8185	STOVROFF AND TAYLOR TRAVEL INC	1,302.67	Y
V7880	SUBCARRIER COMMUNICATIONS INC.	18,757.50	Y
V8162	SUE ANN SIMONIN COURT REPORTING INC	665.00	Y
V6566	SUN LIFE FINANCIAL(USE #3 ADDRESS)	70,827.72	Y
V1853	SUPERIOR LUBRICANTS CO INC	6,944.74	Y
V7892	SYTECH INC	1,475.00	Y
V6767	T. MINA SUPPLY, INC.	528.00	Y
V8484	TALLEY, INC.	630.75	Y
V1997	TANK INDUSTRY CONSULTANTS INC	9,602.49	Y
V2792	TECHNICAL SYSTEMS GROUP INC	14,009.39	Y
V8483	TESSCO INCORPORATED	1,391.97	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V8177	TESTAMERICA LABORATORIES INC	4,643.00	Y
V2787	TGO TECHNOLOGIES, INC.	11,885.00	Y
V0132	THE BUFFALO NEWS	34,230.00	Y
V1593	THE PRENTICE GROUP OF NY INC.	5,172.50	Y
V4101	THE PUMP DOCTOR INC	9,922.77	Y
V8168	THE SAFETY & HEALTH TRAINING CENTER INC	13,425.00	Y
V1795	THE STATE INSURANCE FUND	1,491,090.10	Y
V5374	THOMPSON PIPEGROUP PRESSURE, INC.	38,947.00	Y
V2778	THYSSENKRUPP ELEVATOR CORP.	7,200.00	Y
V8480	TI-SALES INC	8,459.19	Y
V6796	TONY MARTIN AWARDS INC	2,227.50	Y
V2738	TOSHIBA INTERNATIONAL CORPORATION	22,100.00	Y
V8496	TOTAL PIPING SOLUTIONS INC	107,586.16	Y
V2777	TRACEY ROAD EQUIPMENT	47,891.00	Y
V9095	TRANSWAVE COMMUNICATIONS SYSTEMS INC	23,725.00	Y
V4655	U&S SERVICES INC.	3,035.00	Y
V2019	UNITED BUSINESS SYSTEMS	3,436.40	Y
V4665	UNITED SALES USA CORP.	1,357.00	Y
V4664	UPSTATE VALVE AND CONTROL INC.	516.00	Y
V4623	US TRAFFIC CONTROL, INC.	222,890.50	Y
V8131	USA BLUEBOOK	6,406.12	Y
V4663	UTILIS INC.	30,000.00	Y
V8435	V P SUPPLY CO INC	1,778.79	Y
V8404	VALLEY TIRE CO INC	5,377.16	Y
V8719	VERAVIEW LLC	108,201.12	Y
V2073	VISION SERVICE PLAN	20,391.80	Y
V2062	VOLLAND ELECTRIC EQUIPMENT CORP	5,523.71	Y
V0815	W W GRAINGER INC	179,700.71	Y
V6507	W.B.MASON CO.,INC.	2,975.45	Y
V8322	WATSON-MARLOW INC.	42,409.50	Y
V8381	WAYPOINT TECHNOLOGY GROUP	4,845.60	Y
V8336	WENDEL	296,259.46	Y

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N
V2117	WESCO DISTRIBUTION, INC.	14,462.00	Y
V4654	WEST-HERR DODGE	1,072.54	Y
V7722	WM SCHUTT & ASSOCIATES PC	340,411.10	Y
V8368	WOODCUTTERS HEADQUARTERS INC	5,390.68	Y
V4667	WSE-LAB	3,390.00	Y
V0011	XPEDX, LLC	1,845.90	Y
V5554	XYLEM, INC	12,498.36	Y
V8703	ZEND TECHNOLOGIES INC	7,612.00	Y
V2297	ZENGER GROUP	2,075.00	Y

VENDOR ANALYSIS - PAID IN 2019

VENDORS REMOVED FROM 2019 VENDOR LIST

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V2755	2229 GROUP LLC	1,017.00	N	E
V1405	3279 GROUP INC	5,260.00	N	E
V1556	93 PEARL PARKING, LLC	700.00	N	E
V5699	AARON J. OTOKA	304.20	N	E
V2445	ACE HARDWARE	1,416.77	N	C
V6987	ADAM J. PAPISZ	331.68	N	E
V3169	ALBANY MARRIOTT	572.00	N	C
V3028	ALDEN PHARMACY INC	20.10	N	250
V7323	ALEXANDER D. RUSIN	123.38	N	250
V5563	ALLISON GARVEY	15,600.00	N	W
V0231	ALLPRO PARKING, LLC	478.16	N	E
V3287	ALLSTATE INSURANCE COMPANY	31,223.32	N	W
D0359	AMANDA JONES	3,233.03	N	D
V3398	AMAZON.COM	4,797.43	N	C
V0020	AMERICAN PUBLIC WORKS ASSOCIATION	217.00	N	250
V0022	AMERICAN WATER WORKS ASSOCIATION	28,003.58	N	S
V6942	ANDREA POOLE/PETTY CASH	25.15	N	250
V4626	ANDREW DOMINO	145.88	N	250
V4740	ANTHONY DENSON	394.04	N	E
V7001	ARCTIC GLACIER INC	81.00	N	250

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V0081	ASSOCIATION OF METROPOLITAN WATER AGENCIES	11,118.00	N	S
V3343	ATWAL EYE CARE CENTER	49.71	N	250
V9468	AWWA	2,185.76	N	M
V3409	AZTECA SYSTEMS, INC.	90,000.00	N	S
V0634	BAR ASSOCIATION OF ERIE COUNTY	276.00	N	S
V3859	BENJAMIN J. BARBER	30.00	N	250
V3953	BIONDOLILLO EYE CARE	125.00	N	250
V0259	BLICK ART MATERIALS	82.32	N	250
V3674	BOBCAT OF BUFFALO	361.39	Y	
V7878	BRENDEN STOLL	5,250.00	N	E
V3969	BROTHERHOOD OF WNY WATER WORKERS	46,649.00	N	W
V0298	BUFFALO & PITTSBURGH RAILROAD, INC	386.00	N	C
V3958	BUFFALO BACKFLOW, INC.	160.00	N	250
V0299	BUFFALO LAW JOURNAL	1,918.95	N	S
V3942	BUFFALO PAPER AND TWINE COMPANY INC	120.50	N	250
V0313	BUFFALO WATER	40,712.98	N	U
V0220	BUSINESS FIRST OF BUFFALO INC	130.00	N	250
V3965	BXI CONSULTANTS	182.75	N	250
V0301	C S E A INC	50,818.20	N	W
V0427	C S X TRANSPORTATION	421.00	N	C
V7681	CARL STECHENFINGER	34.88	N	250
V2865	CARMAX AUTO SUPERSTORES INC	23,759.29	N	R
D0349	CATHERINE TOBIA	1,010.88	N	D

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V0317	CCH INCORPORATED	624.00	N	S
V1756	CHARLES J SELLERS & COMPANY INC	1,365.23	N	W
V2522	CHEMICAL DISTRIBUTORS INC	370.44	Y	
D0357	CHERYL SMITH	2,500.00	N	D
D0351	CHRISTOPHER RIZZO	1,885.80	N	D
V8498	CITY OF TONAWANDA	217,963.50	N	M
V2806	CLYDES FEED & ANIMAL CENTER	117.87	N	250
V2864	COLANGELO MIOSI & MIOSI	4,523.13	N	R
V2441	COMMISSIONER OF FINANCE - E C HEALTH DEP	226.00	N	250
V3711	COMPUTERSEARCH (BUFFALO TIME CLOCK INC)	34.00	N	250
V8584	CONTINENTAL RESEARCH CORP	235.00	N	250
V2642	COPIER FAX BUSINESS TECHNOLOGIES INC	403.77	Y	
V2833	COUNCIL OPTICIANS	125.00	N	250
V2454	COUNTY OF ERIE COMPTROLLER	252.56	N	M
V4760	D&W DIESEL & ELECTRIC INC	101.00	N	250
V8577	DANIEL NEMOYER	108.43	N	250
V7680	DANIEL SNYDER	11,550.60	N	E
V8650	DAVID T. WOLF	39.00	N	250
V0553	DAVIS ELECTRICAL SUPPLY CO INC	61.34	N	250
V4799	DELL MARKETING LP	100,487.32	N	C
V4731	DELTA SONIC DETAIL SHOP INC	700.00	N	C
V0544	DEMCO	43.51	N	250
V4450	DIG SAFELY NEW YORK, INC.	1,438.00	N	M

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V4829	DIGI-KEY CORPORATION	85.24	N	250
V7835	DONNA SPENCER	8,000.00	N	E
V4929	DRAGAN STOJKOVSKI	145.88	N	250
V6071	EARL L JANN JR	92,000.00	N	E
V5199	EBERL IRON WORKS	296.58	Y	
V2217	ED YOUNGS TOWNE HARDWARE INC	9.48	N	250
V6813	EDWIN MAZGAJ	145.88	N	250
V2261	ELLEN ZIEGLER	6,936.00	N	E
V0608	ELWOOD SAFETY CO., INC.	220.00	N	250
V2440	EMSL ANALYTICAL INC	140.00	N	250
V5102	ENVIRONMENTAL SYSTEMS RESEARCH INST INC	20,200.00	N	S
V0636	ERIE COUNTY CLERKS OFFICE	80.00	N	250
V5185	ERIE COUNTY DEPT OF PUBLIC WORKS	1,685,858.46	N	M
V5198	ERIE COUNTY DEPT OF PUBLIC WORKS	340,525.22	N	U
V5107	ERIE COUNTY PUBLIC HEALTH LABORATORY	4,000.00	N	M
V5121	ERIE COUNTY SUPPORT COLLECTION UNIT	12,596.20	N	W
V8722	ERIE II BOCES	2,219.89	N	R
V5130	ERIE INSTITUTE OF LAW	260.00	N	S
D0348	FARMINGTON WOODS HOME OWNERS' ASSOC.	980.00	N	D
V5300	FELLING TRAILERS INC	110.95	N	250
V5302	FLUID POWER SERVICE CORP	71.09	N	250
V5654	FLYNNS/OMAR TIRE SERV	455.18	Y	
V5261	FOX EQUIPMENT CORPORATION	134.70	N	250

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
D0223	GALLAGHER BASSETT SERVICES INC - BR 167	31,500.00	N	D
V6989	GARY E. PAJONK	32.81	N	250
V6252	GARY KOSTEK	4,819.32	N	E
V6706	GARY MURRAY	8,000.00	N	E
V5703	GEL LABORATORIES LLC	416.00	Y	
D0353	GEORGE HESS	1,381.25	N	D
V0850	GIRARD INDUSTRIES INC	186.40	N	250
V5462	GOVERNMENT FINANCE OFFICERS ASSOCIATION	3,352.00	N	S
V7981	HD SUPPLY FACILITIES MAINTENANCE	318.96	Y	
V6521	HEATHER MANOCCHIO	5,250.00	N	E
V7990	HERITAGE PATH 1 LLC	3,406.01	N	R
V9336	INGERSOLL-RAND AIR CENTER	74.00	N	250
V1017	INTERNAL REVENUE SERVICE	2,668.00	N	M
V1012	IRR SUPPLY CENTERS INC	78.63	N	250
V2863	JAMES F. CROFT	263.32	N	E
V0472	JAMES J CONNORS	5,830.64	N	E
V5131	JAMES M ELARDO	7,110.00	N	E
V6005	JIMS TRUCK PLAZA	375.56	Y	
V7919	JOHN H HERBST	316.88	N	E
V6732	JOHN K MAKELKE	338.14	N	E
V2603	JOHN M CATANZARO(**USE LOCATION #2)	145.88	N	250
V6014	JOHNSON DISTRIBUTING INC	116.79	N	250
V6180	JOSEPH J KREBUSZEWSKI	145.88	N	250

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V4402	JOSHUA WROBLEWSKI	4,198.00	N	E
V2779	JOYCE TOMAKA	301.75	N	E
V1080	JUSTIN JEMIOLO	81.57	N	250
V5701	KAREN GOLBA	856.33	N	R
V4071	KAREN PRENDERGAST	1,698.73	N	E
V6972	KARL POPEK	29.58	N	250
V8266	KENNETH WADOSKY	49.30	N	250
V6124	KIRK KLEIN	123.38	N	250
V6490	LABOR LAW CENTER	131.70	N	250
V6250	LAVONYA LESTER	893.43	N	E
D0358	LEAH HEPWORTH	1,848.08	N	D
V6340	LEN-CO LUMBER CORP	93.42	N	250
V6230	LEONARD KOWALSKI	122.96	N	250
V2512	LESLIE BROGAN/PETTY CASH	354.34	N	E
V6532	LORI MOLINA	501.13	N	E
V6453	LOWES COMPANIES INC	8,193.68	N	C
V1358	MANUFACTURERS & TRADERS TRUST COMPANY	24,432.00	N	C
V6684	MASSACHUSETTS MUTUAL LIFE INSURANCE CO	1,425.00	N	W
V3741	MATTHEW J BAUDO	11,435.14	N	E
V0103	MATTHEW W. BARRETT	639.20	N	E
V9794	MAYER BROTHERS APPLE PRODUCTS	2,407.61	N	R
V6076	MELINDA L ALM JAMES	11,435.14	N	E
V5334	MICHAEL FAHEY	145.88	N	250

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V7986	MICHAEL HAENDIGES	99.76	N	250
V6224	MICHAEL KATILUS	317.28	N	E
V6491	MICHAEL LEWKOWICZ	415.40	N	E
V6758	MICHIGAN STATE UNIVERSITY	4,950.00	N	E
V6718	MID-RANGE USERS GROUP OF WNY	85.00	N	250
V4579	NATALE BUILDING CORP	19,646.72	N	R
V7891	NATHANIEL SKIBA	285.44	N	E
V1401	NATIONAL FUEL GAS CORPORATION	172,740.50	N	U
D0250	NATIONAL FUEL GAS DISTRIBUTION CORP.	12,395.61	N	D
V8574	NATIONAL INSTITUTE OF GOV'T PURCHASING	356.00	N	S
V1415	NATIONALGRID	818,457.12	N	U
V1461	NEW YORK SECTION AWWA	7,405.00	N	S
V8025	NEW YORK STATE DEPARTMENT OF LABOR	3,950.00	N	M
V1410	NEW YORK STATE DEPT OF ENVIRONMENTAL	3,725.00	N	M
V1407	NEW YORK STATE ELECTRIC & GAS CORP	363,222.90	N	U
V8054	NEW YORK STATE THRUWAY AUTHORITY	1,251.50	N	M
V7333	NIAGARA FALLS DRINKING WATER LABORATORY	6,090.00	N	M
V4510	NIAGARA FRONTIER EQUIPMENT SALES, INC	326.22	Y	
V1439	NIAGARA FRONTIER TRANSPORTATION AUTH	75.00	N	250
V8588	NIAGARA SCIENTIFIC PRODUCTS	426.35	Y	
V4501	NLR,INC	322.30	Y	
V1494	NOCO ENERGY CORP	150,125.12	N	C
V4567	NORTHERN SAFETY CO., INC.	48.37	N	250

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V8587	NXTEC-NXKEM SALES GROUP, INC.	206.53	N	250
V8044	NYAAEL, INC	40.00	N	250
V1408	NYS & LOCAL EMPLOYEES RETIREMENT SYSTEM	2,689,751.94	N	M
V8042	NYS DEFERRED COMPENSATION PLAN	943,790.38	N	W
V8014	NYS GOVERNMENT FINANCE OFFICERS ASSOC	1,990.00	N	S
V8524	NYS INDUSTRIES FOR THE DISABLED INC	427,908.99	N	P
V8540	NYS JOINT COMMISSION ON PUBLIC ETHICS	100.00	N	250
V1430	NYS UNEMPLOYMENT INSURANCE	2,685.13	N	M
V1502	O.G. SUPPLY, LLC	103.45	N	250
D0356	PAUL A. CASEY	3,315.00	N	D
V3438	PAUL ALAGNA	256.05	N	E
D0354	PAUL FRONCKOWIAK	2,238.95	N	D
V7595	PAUL SIENKIEWICZ	17,575.07	N	E
V7895	PAUL SUDYN	310.88	N	E
V1570	PEERLESS INC	80.99	N	250
V4067	PENELOPE POREBSKI	224.70	N	250
V1580	POSTMASTER BUFFALO NEW YORK	33,271.27	N	U
V4132	PROVANTAGE CORPORATION	484.50	Y	
V1649	PYRAMID SCHOOL PRODUCTS	153.31	N	250
V5096	R M F PRINT MANAGEMENT GROUP, INC.	459.00	Y	
V3414	RANDY ANDERS	8,000.00	N	E
V4735	RAYMOND DITTMER	8,000.00	N	E
D0355	RAYMOND NAPIERALA	260.94	N	D

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V7278	REGIONAL DISTRIBUTORS INC	320.79	Y	
V4899	RICHARD DEREN	2,382.52	N	E
V0315	ROBERT E. DICKEY	334.08	N	E
V6395	ROBERT J LICHTENTHAL JR	188.80	N	250
V4955	RUSSELL J STOLL	1,384.84	N	E
V8247	SABRINA FIGLER	3,880.75	N	E
V4900	SAMPO	275.00	N	S
V3322	SCOTT A AIPLE	544.85	N	E
V6158	SCOTT KLUBEK	85.77	N	250
V7845	SEAL & DESIGN INC	40.90	N	250
V7749	SHARE CORP	431.65	Y	
V8706	SHARON L ZAJDEL	63.92	N	250
V1772	STANLEY STEEL SERVICE CORPORATION	187.51	N	250
V1768	STAPLES BUSINESS ADVANTAGE	10,272.74	N	C
V1473	STATE OF NEW YORK DEPARTMENT OF HEALTH	2,345.76	N	M
V4455	STEVEN DENZLER	78.19	N	250
V4463	STEVEN G. DEVLIN	149.07	N	250
V1787	SUNOCO CREDIT CARD CENTER	7,018.76	N	C
V6342	SUSAN RINALDO	1,435.10	N	E
D0352	SUZANNE MARZEC	679.69	N	D
V8455	TELEPHONETICS INC	249.95	N	250
V6965	TERRENCE MCCRACKEN	291.10	N	E
V2858	THADDEUS CZOSNYKA	14.67	N	250

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V7889	THE SARATOGA HILTON	2,156.00	N	C
V8128	THE UNITED STATES POSTAL SERVICE	316,480.88	N	U
V1958	TILE PHARMACY INC	66.25	N	250
V2714	TIME WARNER CABLE - SPECTRUM BUSINESS	78,525.16	N	U
V5188	TIMOTHY J ELLING	122.32	N	250
V2208	TIMOTHY W MEEGAN	39.38	N	250
V6730	TODD MEYERS	95.48	N	250
V2790	TOLLS BY MAIL	12.25	N	250
V1921	TONAWANDA TOWN CLERK	1,584.95	N	M
V2641	TOWN OF CHEEKTOWAGA	397,056.01	N	M
V0685	TOWN OF EVANS	1,252,017.71	N	M
V4658	UNITED LABORATORIES, INC.	248.00	N	250
V2030	UNITED PARCEL SERVICE	1,961.65	N	U
V2005	UNITED WAY OF BUFFALO & ERIE COUNTY	3,825.00	N	W
V8104	UPSTATE STEEL INC	196.90	N	250
V8410	VALLEY FAB AND EQUIPMENT INC	445.26	Y	
V8716	VALUE VISION	250.00	Y	
V1411	VERIZON	230,128.96	N	U
V3919	VILLAGE OF BLASDELL	239,940.25	N	M
V2054	VILLAGE OF WILLIAMSVILLE WATER DEPT	277,514.54	N	M
V8357	WATERISAC	6,298.00	N	S
V2137	WEST HERR AUTOMOTIVE GROUP	211.95	N	250
V2113	WEST PUBLISHING PAYMENT CENTER	11,530.96	N	S

VENDOR ANALYSIS - PAID IN 2019

VEN NO	VENDOR NAME	PAID	Y/N	REASON
V8249	WESTERN NEW YORK SAFETY CONFERENCE	225.00	N	250
V2143	WESTERN NEW YORK WATER WORKS CONFERENCE	380.00	N	S
V6560	WILLIAM C. SOJDA	39.00	N	250
D0350	WILLIAM RICHARDSON	413.00	N	D
V4971	WILLIAM STONE III	150.00	N	250
V0320	WILLIAN J. SIMSON JR.	362.31	N	E
V8655	WNY OPTICAL SHOP	250.00	Y	
V8721	YOUNG DEVELOPMENT INC	3,335.52	N	R

REASON DESCRIPTION

250	Total payments less than \$250 in 2019
C	Large corporate vendor - no employee could influence pricing
D	Damage claim paid
E	Current or former employee or payments for employee/customer parking/petty cash
M	Municipal or State agency
P	Preferred source
R	Refunds for customer payments or large service deposits
S	Subscriptions or membership dues
U	Utilities or postage
W	Withholding remittances



Erie County Water Authority

295 Main Street • Room 350 • Buffalo, NY 14203-2494
716-849-8484 • Fax 716-849-8463

Independent Ethics Panel

Paul W. Wolf, Chair

Maureen Krause, Ad Hoc Member

March 31, 2020

EMPLOYEE NAME
ADDRESS
CITY, STATE ZIP

RE: 2019 ECWA Financial Disclosure Statement

Dear NAME:

As part of the Erie County Water Authority's Code of Ethics Policy, revised on March 24, 2020, you are required to file an in-house financial disclosure statement with the Authority's Independent Ethics Panel within ten days of appointment or commencement of employment and thereafter annually. In that regard, attached please find the following:

1. Policy No 11.0 - Code of Ethics & Conflict of Interest Policy, revised on March 24, 2020
2. Policy No. 16.0 – Whistleblower Protection Policy, revised on March 24, 2020.
3. 2019 ECWA Financial Disclosure Statement, a PDF fillable form that can be completed on your computer, then printed and signed.
4. 2019 ECWA Vendor List
5. Employee Acknowledgement

PLEASE NOTE: If you have any questions regarding Policy No. 11.0, you may email the Independent Ethics Panel (IEP@ecwa.org) or you may contact Associate Attorney Jackie Mattina, at extension 8452 or by email at jmattina@ecwa.org.

Please also note that you are required to return your completed 2019 ECWA Financial Disclosure Statement no later than May 15, 2020.

Enclosed please find a hard copy of this paperwork together with an envelope in which you are to place your **completed, signed financial disclosure statement** and return via interoffice mail (or by USPS postmarked by May 15, 2020) to the Independent Ethics Panel, c/o Legal Department, 295 Main Street, Room 350, Buffalo, New York 14203. All envelopes will be time-stamped when received.

Thank you.

INDEPENDENT ETHICS PANEL

Paul W. Wolf, Chairman, Ad hoc Member

Maureen Krause, Ad hoc Member

2019 ECWA Financial Disclosure Statement

March 31, 2020

Page 3

Good Afternoon,

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INDEPENDENT ETHICS PANEL

Paul W. Wolf, Chairman, Ad hoc Member
Maureen Krause, Ad hoc Member