

**St. Lawrence County Board of Ethics**  
48 Court Street  
Canton, New York 13617-1194  
*Telephone: (315) 379-2269; FAX: (315) 379-2254*

DAVID E. HORNING, Chair

**MEMBERS**

RICKY NEWVINE, Vice Chair

MICHAEL J. GIRARD

GALEN K. PLETCHER

JOHANNE SULLIVAN

March 16, 2012

Hon. Sallie Brothers, Chair  
St. Lawrence County Board of Legislators  
48 Court Street  
Canton, New York 13617

Dear Chair Brothers:

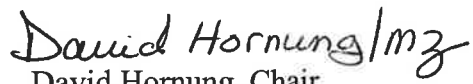
As required in Article 15, Section 7 of the St. Lawrence Country Ethics Law, this document is the Annual Report for the period from January 1, 2011 to December 31, 2011 of the activities of the St. Lawrence County Board of Ethics. In 2011:

1. We finalized our procedure for investigating complaints.
2. We established a procedure for gifts and donations (copy attached).
3. We established an ethics training procedure for current and future country employees.
4. We proposed a revision of the Annual Disclosure Statement that was adopted by the County Legislature.
5. We began a systematic review of the St. Lawrence Country Ethics Law. Our recommendations concerning proposed changes in the law will be sent to the Country Legislature for its consideration later this year.
6. We responded to seven requests for advisory opinions and eight complaints.
7. We reviewed the Annual Disclosure Statements submitted by country employees and county policy makers as required by the St. Lawrence Country Ethics Law.
8. We reviewed the disclosure statements submitted by the St. Lawrence County Industrial Development Agency (IDA).

The members of the Board believe that the disclosure statement designed and promulgated by the IDA is lacking in substance. Although we realize the IDA has the legislative mandate to design its own form, we believe that a form like that prescribed by the St. Lawrence County Ethics Law gives a clearer picture of the members' commitments. With the increased emphasis across the country on ethics reform, we hope the IDA will revise their annual disclosure statement to more

nearly resemble the County form. We believe that openness about possible conflicts of interest instills confidence in government and government agencies.

Very truly yours,

A handwritten signature in cursive script that reads "David Hornung/mz". The signature is written in dark ink and is positioned above the printed name.

David Hornung, Chair

St. Lawrence County Board of Legislators