STATE OF NEW JERSEY STATE ETHICS COMMISSION P.O. Box 082 Trenton, New Jersey 08625-0082 (609) 292-1892

STATE OF NEW JERSEY STATE ETHICS COMMISSION COMMISSION CASE NO. 20-14

IN THE MATTER OF)	
Christina Genovese Renna,)	Administrative Action
former Director,)	
Intergovernmental Affairs,)	CONSENT ORDER
Office of the Governor)	

WHEREAS, the State Ethics Commission ("Commission") is authorized to initiate, receive, investigate, review, and hear complaints regarding violations of the New Jersey Conflicts of Interest Law ("Conflicts Law"), *N.J.S.A.* 52:13D-12 *et seq.*, applicable rules of the Commission, *N.J.A.C.* 19:61-1.1 *et seq.*, the Uniform Ethics Code and any agency code of ethics by any State officer or employee or special State officer or employee; and

WHEREAS, this matter was brought before the Commission by a complaint filed with the Commission; and

WHEREAS, the Commission conducted an investigation of all the matters and issues raised by the complaint;

WHEREAS, as a result of the investigation, the Commission and Christina Genovese Renna ("Renna") desire to enter into a final and complete resolution of all of the matters and issues raised thereby;

IT IS THEREFORE agreed by the parties as follows:

1. Renna began working for the Office of Intergovernmental Affairs ("IGA"), Office of the Governor, in April 2010. From April 2010 through January 2014, Renna held several positions within IGA in which she was responsible for liaising between elected officials and representatives of the business community and troubleshooting any state government-related issues that may arise.

2. In July of 2012, Renna married Michael J. Renna ("MJR"), the President and Chief Operating Officer of South Jersey Energy Solutions, a subsidiary of South Jersey Industries ("SJI") and an affiliate company of South Jersey Gas ("SJG") as well as several other subsidiaries.

3. Renna regularly exchanged and/or forwarded spousal communications through emails with MJR using her State-issued email address and MJR's SJI email address. Some of Renna's emails to MJR disclosed information related to the Office of the Governor or the Administration which she obtained during the course of her official duties, namely: (1) information regarding the attendance of the BPU Commissioners, the BPU President, Lt. Governor Guadagno, and Governor Christie at an upcoming SJI event; and, (2) a BPU press release on an issue MJR had prior knowledge of regarding residential natural gas customers a day before its scheduled release.

4. Renna contacted an employee at the BPU during Superstorm Sandy regarding the safety of SJI personnel and Atlantic City residents. Specifically, the purpose of Renna's outreach to the BPU was to allow SJI operator's access to Atlantic City, so power could be maintained at certain casinos allowing the buildings to be used as emergency refuges during the storm. The BPU employee relayed the concerns to the BPU President, and Renna forwarded BPU's response to MJR.

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5. In the days and weeks following Superstorm Sandy, the Governor's Office held a series of conference calls. The dial-in information for the conference calls was sent to a broad list of elected officials, emergency officials, representatives from the business community that serve the Sandy-affected region, and certain Sandy-affected New Jersey residents. Renna was routinely sent the dial-in information for these calls. IGA employees who sent the information noted that the calls were meant for only the specified invitees. The President of the United States participated on one of these calls. Renna sent the call-in information for several of the calls, including the call on which President Obama participated, to her family members. Renna also told MJR that he could circulate the call-in information for the call on which President Obama would participate to others at SJI.

6. It is the Commission's position that Renna's disclosure of information to MJR and other members of her family violated sections 23(e)(7) and 25 of the Conflicts Law because the information disclosed was obtained through her official duties and was not generally available to members of the public.

7. It is Renna's position that at no time did she act to secure unwarranted privileges or advantages for herself or her family members. Moreover, at no time did she act willfully or in any manner to secure financial gain for herself or her family. Finally, there was never a conflict of interest between her work at the Governor's Office and her husband's employment at SJI. During her tenure at the Governor's Office, she did communicate privately with family members as people commonly do, in good faith. Consequently, she did not at the time believe - nor does she believe now – that she was acting unethically or improperly. In hindsight, however, she can understand how sharing certain emails with her family could be perceived as careless behavior regardless of the fact there was never any intent to behave inappropriately.

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8. Renna acknowledges that the contents of some of the emails she sent to her family members contained information that was not generally available to members of the public which she received in the course of and by reason of her official duties. None of the information shared, was shared for financial gain for herself or any member of her family. Still, Renna knew or should have known at the time she sent the emails that information contained in some of the emails was not generally available to the public.

9. Renna acknowledges that her disclosure of the information described above violated section 23(e)(7) of the Conflicts Law, because it might reasonably be expected to create an impression or suspicion among the public that she may have engaged in conduct violative of her public trust.

10. The parties agree to enter into this Consent Order in settlement of all matters and issues that are involved herein.

11. In consideration of the above, Renna agrees to pay a civil penalty of \$500.00.

Christina Genovese Renna

Andrew S. Berns, Chair State-Ethics Commission

Susana E. Guerrero, Executive Director State Ethics Commission

 $\frac{4}{27}/15$ Dated:

Dated:

5/19/15 Dated: