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July 20, 2016

Jessica Moses Ethics Liaison Officer Office of the Public Defender PO Box 850 Trenton, New Jersey 08625

Re: Waiver to the Provisions of *N.J.S.A.* 52:13D-17.2(b)

Dear Ms. Moses:

At its July 19, 2016 meeting, the State Ethics Commission considered your request on behalf of Debra Wong, Investigator 3, Office of the Public Defender ("OPD"), and her daughter, Elisa Wong, who is currently employed by Caesars Casino as a Total Rewards Coordinator. Based on the facts and circumstances set forth below, the Commission granted a waiver of the general prohibition of section 17.2(b).

Generally, Section 17.2(b) of the Conflicts Law prohibits all State officers and employees and members of their immediate families from holding an interest in, holding employment with, representing, appearing for, or negotiating on behalf of the holder of, or applicant for, a casino license or any holding or intermediary company with respect thereto. However, the statute also contains the following exception language:

except that ... a member of the immediate family of a State officer or employee, or person, may hold employment with the holder of, or applicant for, a casino license if, in the judgment of the State Ethics Commission ... such employment will not interfere with the responsibilities of the State officer or employee, or person, and will not create a conflict of interest, or reasonable risk of the public perception of a conflict of interest, on the part of the State officer or employee, or person

The Commission agrees that there is no conflict between Ms. Wong's position at OPD and her daughter's employment with Caesar's Casino. Ms. Wong's position and her daughter's casino employment

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do not overlap, and there is no conflict of interest or reasonable risk of the public perceiving any kind of conflict between Ms. Wong's employment at OPD and her daughter's casino employment.

Based on the facts and circumstances set forth above, the Commission granted the waiver of the general prohibition of section 17.2(b) in the case of Debra Wong and her daughter, Elisa Wong.

Very truly yours,

STATE ETHICS COMMISSION

For the Commission

Susana E. Guerrero, Executive Director

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