



*State of New Jersey*

STATE ETHICS COMMISSION

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[WWW.NJ.GOV/ETHICS](http://WWW.NJ.GOV/ETHICS)

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**MARK T. HOLMES, ESQ.**  
EXECUTIVE DIRECTOR

December 4, 2019

Valerie Hayes, ELO  
Stockton University  
101 Vera King Farris Drive  
Galloway, New Jersey 08205

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

Dear Ms. Hayes:

At its December 3, 2019 meeting, the State Ethics Commission considered your request on behalf of Jennifer Aarons, Adjunct Professor, Stockton University, who is employed by the Borgata Hotel and Casino as a Director of Spa Operations. 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 (1) a State officer or employee other than a State officer or employee included in the definition of person, and (2) a member of the immediate family of a State officer or employee, or of a person, may hold employment with the holder of, or applicant for, a casino license if, in the judgement 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 ....

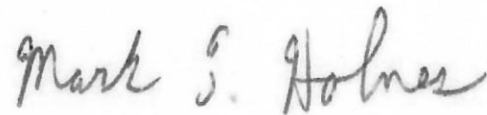
The Commission agrees that there is no conflict between Ms. Aaron's position at the University and her employment with the Borgata Hotel and Casino. Ms. Aaron's position and her casino employment do not overlap, and there is no conflict of interest or a reasonable risk of the

public perceiving any kind of conflict between her position at Stockton University and her secondary 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 Jennifer Aarons.

Very truly yours,

STATE ETHICS COMMISSION

A handwritten signature in cursive script that reads "Mark T. Holmes".

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For the Commission  
Mark T. Holmes  
Executive Director

MTH/sc

*Exit\_Aarons\_CW\_Stockton\_2019*