



**State of New Jersey**  
STATE ETHICS COMMISSION

PO BOX 082  
TRENTON, NJ 08625-0082  
[WWW.NJ.GOV/ETHICS](http://WWW.NJ.GOV/ETHICS)

**PHILIP D. MURPHY**  
GOVERNOR

**SHEILA Y. OLIVER**  
LT. GOVERNOR

**JOSEPH P. LASALA, ESQ.**  
CHAIR

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

October 1, 2020

Pamela Hayes  
Ethics Liaison Officer  
South Jersey Transportation Authority  
Farley Service Plaza  
PO Box 351  
Hammonton, NJ 08037  
*Via email: [phayes@sjta.com](mailto:phayes@sjta.com)*

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

Dear Ms. Hayes:

At its September 29, 2020 meeting, the State Ethics Commission considered your request on behalf of Alyson Winter, Human Resource Specialist II, South Jersey Transportation Authority, who is employed by Bally's Casino in the security department. 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 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. Winter's position at South Jersey Transportation Authority and her employment with Bally's Casino. Ms. Winter'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 South Jersey Transportation Authority 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 Alyson Winter.

Very truly yours,

STATE ETHICS COMMISSION



---

For the Commission  
Mark T. Holmes  
Executive Director

MTH/sc  
*Exit\_Winter\_SJTA\_CW\_2020*