



*State of New Jersey*  
STATE ETHICS COMMISSION

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

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January 29, 2020

Patricia Warford  
Ethics Liaison Officer  
Department of State  
PO Box 300  
Trenton, New Jersey 08625

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

Dear Ms. Warford:

At its January 28, 2020 meeting, the State Ethics Commission considered your request on behalf of Lisa Avichal, Government Representative 2, Department of State, whose father-in-law, Rajendrakuma Avichal, is currently employed by the Hard Rock Hotel and Casino as a Cage Cashier. 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 ....

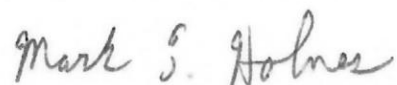
The Commission agrees that there is no conflict between Ms. Avichal's position at the Department of State and her father's employment with at The Hard Rock Hotel and Casino. Ms. Avichal's position and her father-in-law's employment do not overlap, and there is no conflict of interest or

reasonable risk of the public perceiving any kind of conflict between her position and her father-in-law'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 Lisa Avichal and her father-in-law, Rajendrakuma Avichal.

Very truly yours,

STATE ETHICS COMMISSION



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For the Commission  
Mark T. Holmes  
Executive Director

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