



**State of New Jersey**  
**STATE ETHICS COMMISSION**

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

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September 12, 2022

Valerie Hayes, Esq.  
Ethics Liaison Officer  
Stockton University  
Galloway, NJ 08205

**Via Email Only:** [valerie.hayes@stockton.edu](mailto:valerie.hayes@stockton.edu)

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

Dear Ms. Hayes:

At its September 9, 2022 meeting, the State Ethics Commission considered the University's request on behalf of Robert Ferguson, Teaching Specialist Management, Stockton University, who is also employed by Elite Casino Marketing Group LLC as a Lead Trumpet and Flugelhorn player. 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 Mr. Ferguson's position at Stockton University and his employment with Elite Casino Marketing Group LLC. Mr. Ferguson's position and his casino employment do not overlap, and there is no conflict of interest or reasonable risk of the public perceiving any kind of conflict between his position and his 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 Robert Ferguson.

Very truly yours,

STATE ETHICS COMMISSION



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For the Commission  
Christina C. Fullam  
Deputy Director

CCF/sc

*Exit\_Ferguson\_Stockton\_CW*