



State of New Jersey
STATE ETHICS COMMISSION

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September 12, 2022

Pamela Hayes
Ethics Liaison Officer
South Jersey Transportation Authority
Hammonton, NJ 08037
Via Email Only: phayes@sjta.com

Re: Waiver to the Provisions of *N.J.S.A. 52:13D-17.2b(3)*

Dear Ms. Hayes:

At its September 9, 2022 meeting, the State Ethics Commission considered the Authority's request on behalf of Michael Suleiman, Manager, South Jersey Transportation Authority, who also serves on the Floro Absecon Advisory Board, a cannabis business, as an Advisor. Based on the facts and circumstances set forth below, the Commission granted a waiver of the general prohibition of section 17.2b(3).

Generally, Section 17.2b(3) 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 a medical cannabis entity¹ or a personal use cannabis entity.² However, the statute also contains the following exception language:

a member of the immediate family of a State officer or employee, or of a person, may hold employment with [a medical cannabis entity or a personal use cannabis entity], 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

¹ Medical cannabis entity includes a holder of or applicant for a medical cannabis cultivator permit, medical cannabis manufacturer permit, medical cannabis dispensary permit, or clinical registrant permit, any entity that employs any certified medical cannabis handler to perform transfers or deliveries of medical cannabis, or any holding or intermediary company with respect thereto.

² Personal use cannabis entity includes a holder of or applicant for a cannabis cultivator, cannabis manufacturer, cannabis wholesaler, cannabis distributor, cannabis retailer, or cannabis delivery service license, any entity that employs or uses a certified personal use cannabis handler to perform work for or on behalf of a licensed cannabis establishment, distributor, or delivery service, or any holding or intermediary company with respect to thereto.

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. Suleiman's position at SJTA and his employment with the Floro Absecon Advisory Board. Mr. Suleiman's position and his cannabis 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 cannabis employment.

Based on the facts and circumstances set forth above, the Commission granted the waiver of the general prohibition of section 17.2b(3) in the case of Michael Suleiman. Please be advised that this waiver is limited to employment, thus the restrictions on interest holdings and representation noted above still apply.

Very truly yours,

STATE ETHICS COMMISSION



For the Commission
Joy-Michele Johnson
Executive Director

CCF/sc
Exit_Suleiman_SJTA_CBW