



**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

**STEPHANIE A. BROWN, ESQ.**  
CHAIR

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

February 2, 2022

Valerie Hayes  
Ethics Liaison Officer  
Stockton University  
101 Vera King Farris Drive  
Galloway, New Jersey 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 February 1, 2022 meeting, the State Ethics Commission considered the University's request on behalf of Kevin Zulauf, Head Men's Lacrosse Coach, Stockton University, whose spouse, Serena Zulauf, is currently employed by the Hard Rock Hotel and Casino as Cocktail Server. 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. Zulauf's position at Stockton University and his spouse's employment with the Hard Rock Hotel and Casino. Mr. Zulauf's

position and his spouse's 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 spouse'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 Kevin Zulauf and his spouse, Serena Zulauf.  
Very truly yours,

STATE ETHICS COMMISSION



---

For the Commission  
Mark T. Holmes  
Executive Director

MTH/sc  
*Exit\_Zulauf\_Stockton\_CW\_2022*