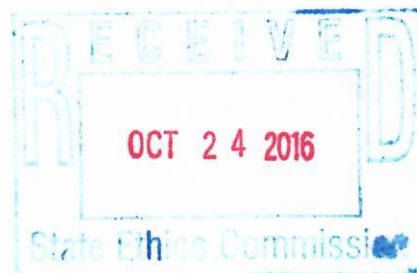


STATE OF NEW JERSEY
STATE ETHICS COMMISSION
Post Office Box 082
Trenton, New Jersey 08625-0082
(609) 292-1892



**STATE OF NEW JERSEY
STATE ETHICS COMMISSION
COMMISSION CASE NO. 16-16**

IN THE MATTER OF SHARON	:	
GORDON, DEPUTY EXECUTIVE	:	Administrative Action
DIRECTOR, SOUTH JERSEY	:	
TRANSPORTATION AUTHORITY	:	CONSENT ORDER
	:	

WHEREAS, the State Ethics Commission (“Commission”) is authorized to initiate, receive, investigate, review and hear complaints regarding violations of the New Jersey Conflicts of Interest Law, *N.J.S.A. 52:13D-12 et seq.* (“Conflicts Law”), applicable rules of the Commission, *N.J.A.C. 19:61-1.1 et seq.*, the Uniform Ethics Code, and any agency code of ethics, by any State officer or employee or special State officer or employee; and

WHEREAS, this matter was brought before the Commission by a complaint filed with the Commission; and

WHEREAS, the Commission conducted an investigation of all matters and issues raised by the complaint; and

WHEREAS, as a result of the investigation, the Commission and Sharon Gordon (“Gordon”) desire to enter into a final and complete resolution of all matters and issues raised thereby;

IT IS THEREFORE agreed by the parties as follows:

1. Gordon has been employed with the South Jersey Transportation Authority (“SJTA”) since 2000. As Director of Marketing Communications and Air Service Development, Gordon frequently partnered with various airlines at the Atlantic City Airport (“Airport”) to run marketing campaigns. In 2009, Gordon was promoted to Deputy Executive Director of Administration, wherein Gordon works with various airline employees and their representatives to determine route plans, obtain new routes and attempt to recruit air service to and from the Airport. In addition, Gordon acted as the Director of Communications with regard to any media or events that occurred at the Airport. As a result of her position, Gordon was issued a badge that allowed her access to secure locations at the Airport.

2. Specific seat assignments on Spirit Airlines (“Spirit”) flights are not required. Spirit charges a fee to reserve a specific seat. The cost to reserve a specific seat varies by route and location. In most circumstances, Spirit also charges a fee to modify or change a flight reservation but has the ability to waive said fees.

3. Landmark Aviation (“Landmark”) operates the ticket counter at the Airport for Spirit.

The State Ethics Commission’s Position:

4. In September 2015, Gordon went to the Spirit ticket counter at the Airport and showed her State business card to a Landmark employee while she was seeking a fee waiver for seat assignments on a Spirit flight from Atlantic City, New Jersey to Fort Myers, Florida for both herself and her husband.

5. Gordon requested and received fee waivers for seat assignments and changed flights for both herself and her husband. She used her State-issued badge, which gave her access

to secure areas at the Airport, for purposes of gaining access to Spirit employees to request and obtain these waivers.

6. On multiple occasions, Gordon also had her assistant at SJTA contact Spirit on her behalf to make changes to Gordon's personal flights and request fee waivers.

7. On September 1, 2010, Gordon used her State email to contact a corporate employee of Spirit to request that he instruct the General Manager of Atlantic City Airport Operations to authorize a flight change for her on a personal flight from Fort Myers to Atlantic City. Gordon also sent an email dated November 22, 2011 to two corporate employees at Spirit requesting that Spirit cancel her reservations for two round trip flights between Fort Myers and Atlantic City. After rescheduling the reservations, Gordon later cancelled the rescheduled reservations, and sent emails dated December 27, 2011, January 3, 2012 and January 4, 2012 seeking a credit voucher to be used for future flight reservations. After contacting Spirit's corporate staff directly using her State email, Gordon was not charged the standard fees for these rescheduled and cancelled flights.

8. Gordon violated sections 23(e)(3) and (e)(7) of the Conflicts Law by misusing her State position to secure unwarranted privileges or advantages for herself and her husband from Spirit Airlines. Specifically, Gordon used her State position to seek, and in some instances obtain, free seat assignments and flight changes from Spirit, and she misused State time and resources, including her State email, computer, and SJTA support staff, to secure and obtain these privileges.

Sharon Gordon's Position:

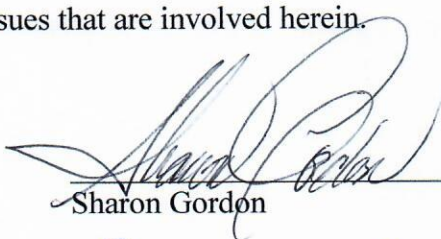
9. Gordon agrees that she produced her State business card to a Landmark employee working at the Spirit ticket counter on one occasion when she was seeking seat assignments for herself, her husband and her grandson, but maintains that she only did so because the Landmark

from Spirit, or at a minimum creating the impression that she engaged in conduct violative of the public trust.

Resolution:

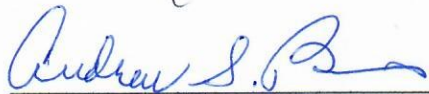
15. In consideration of the above, Gordon agrees to pay a civil penalty in the amount of \$3,000.00. \$300.00 shall be due on or before December 31, 2016. Thereafter, Gordon shall make six additional payments of \$450.00 each on or before the following dates: March 31, 2017, June 30, 2017, September 30, 2017, December 31, 2017, March 31, 2018, and June 30, 2018.

16. The parties agree to enter into this Consent Order in settlement of all matters and issues that are involved herein.



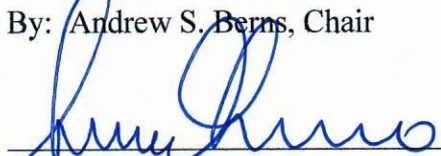
Sharon Gordon

Dated: 10/18/16



State Ethics Commission
By: Andrew S. Berns, Chair

Dated: 12/1/16



State Ethics Commission
By: Susana E. Guerrero, Executive Director

Dated: 12/6/16