

**DEPARTMENT OF LAW AND PUBLIC SAFETY  
OFFICE OF THE ATTORNEY GENERAL**



**Division of Gaming Enforcement  
Supplemental Code of Ethics**

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## **I. SCOPE AND PURPOSE**

The Casino Control Act requires the Division of Gaming Enforcement in the Department of Law and Public Safety to promulgate and maintain a Code of Ethics "governing its specific needs," N.J.S.A. 5:12-59c, and subject to the approval of the State Ethics Commission. N.J.S.A. 5:12-59e.

Employees of the Division of Gaming Enforcement are also subject to the Conflicts of Interest Law, N.J.S.A. 52:13D-12 et seq., and the Uniform Ethics Code, issued by the State Ethics Commission, to serve as the primary code of ethics for State officers and employees as well as special State officers and employees in the State agencies in the Executive Branch of State Government. N.J.S.A. 52:13D-23a(2).

Therefore, in accordance with the Casino Control Act and the Conflicts of Interest Law, the Division of Gaming Enforcement promulgates this Code of Ethics to supplement the Uniform Ethics Code and the Department of Law and Public Safety Supplementary Code of Ethics. This Code of Ethics is to be followed by all employees of the Division of Gaming Enforcement.

It shall be the continuing duty of each employee of the Division of Gaming Enforcement to review and assess his or her conduct in the light of the provisions this Code and the Uniform Ethics Code and the Department of Law and Public Safety Supplementary Code of Ethics. Each employee shall have the affirmative obligation to request advice from the Division of Gaming Enforcement's Agency Ethics Liaison Officer regarding the propriety of past or future conduct when any doubt involving ethical considerations arise. To prepare and deliver an appropriate response, the Division of Gaming Enforcement's Agency Ethics Liaison Officer shall consult with the Ethics Liaison Officer of the Department of Law and Public Safety.

When necessary, the Director of the Division of Gaming Enforcement, through its Agency Ethics Liaison Officer, shall request the Ethics Liaison Officer of the Department of Law and Public Safety to seek, on behalf of the Division of Gaming Enforcement, a formal ruling or advisory opinion from the State Ethics Commission.

## **II. ADMINISTRATION**

With the approval of the Attorney General, the Director of the Division of Gaming Enforcement shall designate an Agency Ethics Liaison Officer who shall, through the Ethics Liaison Officer of the Department of Law and Public Safety, serve as a liaison to the State Ethics Commission and perform such other duties as the Uniform Ethics Code, the Department of Law and Public Safety Supplementary Code of Ethics and this Code shall assign. The Human Resource Management section of the Division of Gaming Enforcement shall provide for the distribution of such forms, notices and advisories as may be necessary to implement the provisions of this Code. The Ethics Liaison Officer of the Department of Law and Public Safety shall meet with the Division of Gaming Enforcement's Agency Ethics Liaison Officer, Human Resource Management personnel, and Director to discuss outstanding issues and may recommend to the Attorney General and the Director additions or modifications to this Code.



### III. TERMS USED IN THIS CODE

Except where otherwise indicated, terms used in this Code shall be interpreted as defined by the Casino Control Act, the Uniform Ethics Code, or the Department of Law and Public Safety Supplementary Code of Ethics. In addition, for the purposes of this Code, the following definitions apply:

“Act” means the Casino Control Act, N.J.S.A. 5:12-1 et seq.

“AELO” means the Agency Ethics Liaison Officer, the Ethics officer of the Division of Gaming Enforcement.

“CCC” or “Commission” means the Casino Control Commission.

“COIL” means the Conflicts of Interest Law.

“Cohabit” for the purposes of Section XIII of this Code, means to reside in a house, apartment or other living quarters with any other person or persons.

“Covered entity” or “covered entities” as used in Section V of this Code means any applicant, licensee, registrant or other person or entity requiring licensure, registration or approval under the Act.

“DELO” means the Ethics Officer of the Department of Law and Public Safety.

“Department” means the Department of Law and Public Safety.

“Department Code” means the Department of Law and Public Safety Supplementary Code of Ethics.

“Director” means the Director of the Division of Gaming Enforcement.

“Division” or “DGE” means the Division of Gaming Enforcement.

“Employee” means an employee of the Division, including attorneys and investigators and all clerical and secretarial personnel.

“FDS” means a financial disclosure statement.

“Gaming consultant firm” means any individual or entity engaged in activities, whether or not for compensation, on behalf of a New Jersey gaming entity, an out of State gaming entity, an out of State regulatory agency, any persons interested in gaming, or the DGE, the CCC, the Division of the New Jersey Racing Commission, the New Jersey Legalized Games of Chance Commission or the New Jersey State Lottery Commission. Such activities include, but are not limited to, legal, regulatory, research and analysis, technical services related to the



operation of gaming activity, security or investigative services, financial or other auditing services, services related to planning, developing, or securing real estate for or construction of a gaming facility, services related to lobbying or public advocacy campaigns, or any other consulting service.

"Licensure, approval or registration" means any license, approval or registration, including any certificate, permit or other qualification required under the Act or by the Division of the New Jersey Racing Commission, the New Jersey Legalized Games of Chance Control Commission, the New Jersey State Lottery Commission, or any out of State regulatory agency.

"New Jersey gaming entity" means any individual or entity subject to licensure, approval, or registration under the Act or by the Division of the New Jersey Racing Commission, the New Jersey Legalized Games of Chance Control Commission or the New Jersey State Lottery Commission or any applicant for such licensure, approval, or registration, or any holding or intermediary company, parent company, affiliate or subsidiary with respect thereto.

"Out of State gaming entity" means any individual or entity located outside the State of New Jersey which is subject to an out of State regulatory agency or is engaged in activities which if conducted in New Jersey would be subject to licensure, approval, or registration under the Act or by the Division of the New Jersey Racing Commission, the New Jersey Legalized Games of Chance Control Commission or any individual or entity that is an applicant before an out of State regulatory agency, including any holding or intermediary company, parent company, affiliate or subsidiary with respect thereto, or any individual or entity engaged in internet gambling or other gaming activity which would be illegal if conducted in the State of New Jersey.

"Out of State regulatory agency" means any agency of another State, tribal jurisdiction, foreign country, or any agency of a local jurisdiction therein which has powers, duties or responsibilities which are the same as or similar to those of the DGE, CCC, the Division of the New Jersey Racing Commission, the New Jersey Legalized Games of Chance Commission or the New Jersey State Lottery Commission.

"Persons interested in gaming" means any individual or entity, including any governmental entity in this or a foreign country, which is studying, planning to engage in, publicly advocating a position or lobbying for or against a policy, rule, regulation or legislation related to a gaming activity which, if conducted in the State of New Jersey would be subject to licensure, approval or registration under the Act or by the Division of the New Jersey Racing Commission, the New Jersey Legalized Games of Chance Control Commission or the New Jersey State Lottery Commission, or which would be illegal if conducted in the State of New Jersey. This includes any individual or entity engaged in these activities whether in New Jersey or another jurisdiction.



“Published work” for the purposes of Section VII of this Code, means any tangible medium of expression, including, but not limited to, literary, pictorial, graphic and sculptural matter, sound recordings, and software as well as a patent or any other form of intellectual property.

“SEC” means the State Ethics Commission.

“UEC” means the Uniform Ethics Code.

#### **IV. SUPPLEMENTAL PROVISIONS**

All employees are subject to the provisions of this Code set forth below. Employees shall read these provisions in conjunction with the UEC and the Department Code to determine standards applicable to their conduct. Like this Code, the UEC and the Department Code are posted on the DGE intranet for the ease of reference of all employees.

##### **Section I General Standards of Conduct**

###### **A. Prescribed by the Act**

1. It shall be the duty of the Director and any employee to appear and testify upon matters directly related to the conduct of their offices, positions or employment before any State or Federal court, grand jury, or the State Commission of Investigation. Any Director or employee who fails to appear and testify, after having been informed of his or her duty to appear and testify by the prosecuting attorney, or a member of or an attorney for the State Commission of Investigation, as the case may be, shall be subject to removal from his or her office. N.J.S.A. 2A:81-17.2a1; N.J.S.A. 5:12-55.
2. No employee shall personally or through another, whether in person or online, gamble with a casino or wager on sports with an entity licensed by the CCC, the DGE, or the New Jersey Racing Commission; provided, however, that nothing contained herein shall prevent an employee from gambling in any establishment in the course of his or her official duties in accordance with operational procedures governing such activity. N.J.S.A. 5:12-59e(1).
3. No employee shall act in his or her official capacity in any matter wherein his or her spouse, domestic partner, or civil union partner, child, parent or sibling has a direct or indirect personal or financial interest that might reasonably be expected to impair his or her objectivity or independence of judgment. N.J.S.A. 5:12-59e(3).
4. No employee shall act in his official capacity in a matter concerning an applicant for licensure or a licensee who is the employer of a spouse, domestic partner or civil union partner, child, parent, or sibling of said employee when the fact of the

employment of such spouse, domestic partner or civil union partner, child, parent or sibling might reasonably be expected to impair the objectivity and independence of judgment of said employee. N.J.S.A. 5:12-59e(4).

5. No spouse, domestic partner or civil union partner, child, parent or sibling of the Director shall be employed in any capacity by an applicant for a casino license or a casino licensee nor by any holding, intermediary or subsidiary company thereof. N.J.S.A. 5:12-59e(5).
6. No employee shall have any interest, direct or indirect, in any applicant or in any person licensed or registered under the Act during his or her term of office or employment. N.J.S.A. 5:12-59f.

B. Financial Disclosure

1. The Director shall file with the SEC a financial disclosure statement listing all assets and liabilities, property and business interests, and sources of income of said Director and his or her spouse, domestic partner or civil union partner, as the case may be, and shall provide to the SEC a financial disclosure statement listing all assets and liabilities, property and business interests, and sources of income of the parents, brothers, sisters, and children of said Director. Such statement shall be under oath and shall be filed at the time of employment and annually thereafter. N.J.S.A. 5:12-58d.
2. Each employee, except for secretarial and clerical personnel, shall file with the SEC a financial disclosure statement listing all assets and liabilities, property and business interests, and sources of income of said employee and his or her spouse, domestic partner or civil union partner, as the case may be, and any other financial information that may be required by the SEC. Such statement shall be under oath and shall be filed at the time of employment and annually thereafter. N.J.S.A. 5:12-58e.

C. Additional Requirements

1. It shall be the duty of each employee to refrain at all times from any criminal conduct and to cooperate with law enforcement officers in the proper performance of their official duties.
2. Public comment regarding any investigation or proceeding to which the DGE is a party or is otherwise involved shall not be made except upon the express approval of the Attorney General or his or her designee.
3. Prior to making any formal written or verbal statement which identifies him or her as an employee, the employee shall seek the approval of the Director or his or her designee.



4. No employee shall transfer any present or potential direct financial interest in any personal property, real property, intellectual property or commercial business to his or her spouse, domestic partner or civil union partner, or any relative as that term is defined by the COIL, when such transfer is for the purpose of allowing the spouse, domestic partner or civil union partner or relative to engage in an activity that the employee would not be permitted to engage in under the provisions of the COIL, the UEC, the Department Code or this Code had the employee retained such property.
5. Attorneys employed by the Division shall conduct themselves in accordance with every affirmative duty and obligation imposed by the New Jersey Rules of Professional Conduct and other court rules and directives or statutes governing the conduct of attorneys.
6. Each employee who is aware of conduct by himself, herself or any other employee which violates this Code of Ethics, or State or federal law shall disclose the conduct to the AELO, the DELO and the Director. In situations where the conduct of an employee involves potential criminality, disclosure should be made to the Director of the Division of Criminal Justice.

## **Section II      Acceptance of Gifts**

- A. No employee shall solicit or knowingly accept any gift, gratuity, favor, meal, service or other thing of value, individually or through or on behalf of another person, from any applicant, licensee, registrant or other person or entity requiring licensure, registration or approval under the Act or from any person or entity acting on their behalf. N.J.S.A. 5:12-59a; N.J.S.A. 52:13D-24a.
- B. No employee shall solicit or accept any fee, honorarium, or other thing of value for any article, speaking engagement or other participation in any activity in which the employee acts in an official capacity. N.J.S.A. 5:12-59a; N.J.S.A. 52:13D-24a.

## **Section III      Attendance at Events**

- A. Employees shall be permitted to attend a convention, meeting, show, exhibition or other event, eat meals, drink beverages, and purchase any thing or service at any premises subject to licensure, registration or approval under the Act without specific prior approval, provided that such employee:
  1. does not solicit or request special or unusual treatment or services at any licensed premises;
  2. pays prevailing rates for all meals, beverages, goods, services, shows, and events, or will have the same paid by his or her spouse or other person accompanying such employee;



3. does not solicit or accept any complimentary food, beverages, goods, services or rooms; and
  4. retains for a period of one year following the date of attendance or purchase, true copies of all bills marked paid or accompanied by a customer credit card receipt, which the employee shall make available for review upon request of the Director or his or her designee.
- B. Employees shall be permitted to stay overnight in a guest room at any casino hotel licensed by the CCC without specific prior approval, provided that such employee:
1. pays the prevailing rate for such guest room or will have the same paid by his or her spouse or other person accompanying such employee; and
  2. retains for a period of one year following the date of any overnight stay, a true copy of the room receipt marked paid or accompanied by a customer credit card receipt, which the employee shall make available for review upon request of the Director or his or her designee.
- C. Out of State Casino Hotel
1. **Traveling in the Course of Official Business:** An employee traveling in the course of official business may stay at an out of State casino hotel affiliated with a New Jersey casino hotel provided that (a) the DGE pays the prevailing rate for any room; (b) the cost of the room falls within the limits established by the applicable OMB Circular and Department guidelines; and (c) the employee does not solicit or request any special or unusual treatment or services for himself or herself or another or solicit or accept any complimentary food, beverages, goods, services, rooms, or admission to shows or events for himself or herself or another by virtue of his or her position with the DGE.
  2. **Traveling in a Private Capacity:** An employee traveling in his or her private capacity may stay at an out of State casino hotel affiliated with a New Jersey casino hotel provided the employee does not solicit or request or accept special or unusual treatment or services for himself or herself or another by virtue of his or her position with the DGE.

#### **Section IV Political Activity**

- A. No employee shall:
1. use his or her official authority or influence for the purpose of interfering with or affecting the result of an election or a nomination for office, N.J.S.A. 5:12-59h(1);

2. directly or indirectly coerce, attempt to coerce, command or advise any person to pay, lend or contribute anything of value to a party, committee, organization, agency or person for political purposes, N.J.S.A. 5:12-59h(2);
  3. take any active part in political campaigns or the management thereof, N.J.S.A. 5:12-59h(3), or authorize the use of his or her name in connection with any political candidate or material;
  4. perform any polling duties; or
  5. display a political picture or sticker on any state-owned or state-leased property or wear any indicia of political affiliation while on duty.
- B. Nothing herein shall prohibit an employee from voting as he or she chooses or privately expressing his or her personal opinions on political subjects and candidates. N.J.S.A. 5:12-59h(3).

## **Section V      Outside Employment and Other Activities**

### **A.      Prior Employment and Interests**

#### **1.      General Standards**

- (a) No person shall be employed by the DGE if, during the period commencing 3 years prior to employment, said person held any direct or indirect interest in, or any employment by:
  - i. any person licensed as a casino licensee pursuant to N.J.S.A. 5:12-87;
  - ii. any person licensed as a casino service industry enterprise pursuant to N.J.S.A. 5:12-92(a); or
  - iii. any person who has an application pending. N.J.S.A. 5:12-58b.
- (b) Persons with pre-employment by and interests in gaming consultant firms, an out of State gaming entity, or out of State regulatory agency must disclose such facts and the nature of contacts, if any, with the New Jersey gaming industry, including but not limited to any entities subject to licensure, approval or registration under the Act. Upon review of the Director and the AELO, recusal mechanisms may be imposed, provided the prior employment and interests do not otherwise interfere with the objective discharge of such person's employment obligations.
- (c) The Director and each employee shall, prior to appointment or employment, swear or affirm that he or she possesses no interest in any



business or organization licensed or registered under the Act. N.J.S.A. 5:12-58c.

2. Exceptions

- (a) A person may be employed by the DGE in a secretarial or clerical position if, in the opinion of the DGE, his or her previous employment by, or interest in, any casino licensee or casino service industry enterprise would not interfere with the objective discharge of such person's employment obligations. N.J.S.A. 5:12-58b.
- (b) A person may be employed by the DGE if the interest of such person in any casino licensee or casino service industry enterprise which is publicly traded, would not, in the opinion of the DGE, interfere with the objective discharge of such person's employment obligations, but in no instance shall any person be employed by the DGE if his or her interest in such a publicly traded casino licensee or casino service industry enterprise constituted a controlling interest in that casino licensee or casino service industry enterprise. N.J.S.A. 5:12-58b.

B. During the Term of Employment

1. General Standards

- (a) Each employee shall devote his or her entire time and attention to his or her duties and shall not pursue any other business, occupation or other gainful employment; provided, however, that secretarial and clerical personnel may engage in such other gainful employment as shall not interfere with their duties to the DGE, unless otherwise directed; and provided further, however, that other DGE employees may, upon prior approval by the Director, engage in such other gainful employment as shall not interfere or be in conflict with their duties to the DGE. N.J.S.A. 5:12-59g.
- (b) Attorneys employed by the DGE shall refer to Section VI of the Department Code for special obligations which apply to them.
- (c) Each employee who seeks to engage in secondary employment or to act as an independent contractor, whether or not for compensation, while in the employ of the DGE shall, in advance of accepting such employment, or agreeing to act as an independent contractor, be required to submit a written request for approval to do so through his or her supervisor and the AELO to the Director, whose approval shall require the concurrence of the Attorney General or his or her designee.

- (d) It shall be the affirmative responsibility of each employee who is granted approval pursuant to the provisions of this Code to advise the AELO of any material change to the circumstances of his or her outside employment or other activity.
- (e) Although an employee may adhere to this Code, the Act, the COIL, the UEC and the Department Code with respect to outside employment, the DGE, in its discretion, may subject the employee's outside employment or other activities to review and may refuse to permit the outside employment or other activity if it adversely affects the employee's work habits, performance and attendance record.
- (f) Notwithstanding the provisions of paragraphs (a) through (e) above or any other provision of this Code, all employees shall be subject to the restrictions set forth in subsection 2 below with respect to outside employment or other activity as an independent contractor related to the gaming industry.

2. Gaming Industry Restrictions

- (a) No DGE employee, whether or not for compensation, shall be employed by or provide services as an independent contractor to any gaming consultant firm, New Jersey gaming entity, out of State gaming entity, out of State regulatory agency, or persons interested in gaming or to any individual or entity which, as determined by the Director or the Attorney General or his or her designee, has an interest related to the gaming industry that presents a conflict or the appearance of a conflict with the work of the DGE or the Department.
- (b) Entities Not Otherwise Related to the Gaming Industry - No DGE employee may participate in the application of any individual or entity for licensure, approval or registration required by the New Jersey Legalized Games of Chance Control Commission or the New Jersey State Lottery Commission.
  - i. Nothing in this section is intended to prohibit a DGE employee from providing uncompensated voluntary services on behalf of a religious organization, charity or other not for profit entity which is unrelated to the gaming industry. To the extent such entity conducts activity subject to the jurisdiction of the New Jersey Legalized Games of Chance Control Commission, including but not limited to bingo and raffles, the DGE employee shall not oversee, conduct, keep records for, or otherwise manage or direct such activity. A DGE employee who provides compensated services to such an entity must obtain the approval required by subsection 1 above.



- ii. All DGE employees who seek to provide compensated or uncompensated services to an entity which is unrelated to the gaming industry, but is authorized by the New Jersey State Lottery Commission to sell lottery tickets and other game cards, shall disclose to the DGE that the entity is a distributor of lottery tickets or other game cards. To the extent that the DGE employee is involved in handling, distributing or selling lottery tickets or other game cards for such entity, the DGE employee shall obtain specific approval from the Attorney General and the Director to engage in such conduct and shall comply with the requirements of subsection 1 above.
  - (c) Teaching\Training - A DGE employee may be employed by or enter into a contract with an educational entity to serve as a teacher or trainer or perform other educational consulting services relating to a gaming industry-related curriculum provided that the DGE employee submits a request in accordance with subsection 1 above; that the educational entity is not owned or operated by or affiliated with any gaming consultant firm, New Jersey gaming entity, out of State gaming entity, out of State regulatory agency or persons interested in gaming as those terms are defined in this Code; and subject to any applicable provisions of the COIL regarding an employee's ability to contract with a State agency.
  - (d) Assistance to Out of State Regulatory Agencies - Nothing in this section prohibits the DGE in accordance with applicable State law regarding the exchange of services with other jurisdictions, from providing the services of DGE employees to assist an out of State regulatory agency, provided all assistance shall be conducted by DGE employees acting in their official capacity.
  - (e) Subject to approval by the Attorney General or his or designee, the Director may permit an exception to the prohibitions stated in paragraphs (a) through (d) above when the facts sufficiently demonstrate that the activity in which the DGE employee proposes to engage will not be contrary to the purposes of this section or interfere with the work of the DGE or the Department.
3. Non-Profit Organizations (NPOs)
- (a) Notwithstanding the prohibitions in Section II A of this Code, an employee may
    - i. provide volunteer, uncompensated services to an NPO where the employee is neither a member of the board of trustees nor an officer of the NPO and the employee does not personally or



otherwise directly participate in the NPO's solicitation or acceptance of any thing of value from covered entities;

- ii. engage in compensated employment for an NPO if the services provided are unrelated to fund-raising, the employee is not personally or directly involved with the solicitation of or acceptance of any thing of value from a covered entity, and there are no other facts to suggest that the covered entity is making a donation to the NPO to benefit the employee;
  - iii. serve as an uncompensated board member of an advisory board or a non-voting member of the board of trustees of the NPO, as long as the employee: does not personally or otherwise directly participate in the NPO's solicitation or acceptance of any thing of value from covered entities; recuses himself or herself in writing from any involvement in NPO matters concerning the solicitation and acceptance of things of value from covered entities, including the planning stages of any charitable contribution campaign by the NPO that the employee knows or has reason to believe will target covered entities; and removes his or her name from the NPO's letterhead on any solicitations that go to covered entities; or
  - iv. provide services as an independent contractor to an NPO that solicits and/or accepts things of value from a covered entity. As an independent contractor, however, the employee cannot personally or otherwise directly perform services for the NPO which constitute participation in the NPO's solicitation or acceptance of any thing of value from a covered entity. This prohibition includes not only participation in the soliciting or acceptance or things of value from covered entities but also direct participation by the independent contractor in the planning stages of any charitable contribution campaign by the NPO that the employee knows or has reason to believe will target covered entities.
- (b) An employee who is not involved in the solicitation or acceptance of anything of value from a covered entity by an NPO with which he or she is affiliated must still recuse himself or herself from any official involvement with matters concerning the donor in his or her official State capacity to avoid a violation of the COIL, N.J.S.A. 52:13D-23e(4), (7).

## **Section VI Post-Employment Restrictions**

- A. The Director shall not hold any direct or indirect interest in, or be employed by, any applicant or by any person licensed by or registered under the Act for a period of four years commencing on the date his directorship terminates. N.J.S.A. 5:12-60a.



- B. No employee may acquire any direct or indirect interest in, or accept employment with, any applicant or any person licensed by or registered under the Act for a period of two years commencing at the termination of employment with the DGE, except that a secretarial or clerical employee of the DGE may accept such employment at any time after the termination of employment with the DGE. At the end of two years and for a period of two years thereafter, a former employee who held a policy-making management position at any time during the five years prior to termination of employment may acquire an interest in, or accept employment with, any applicant or person licensed or registered under the Act upon application to and the approval of the Director, upon a finding that the interest to be acquired or the employment will not create the appearance of a conflict of interest and does not evidence a conflict of interest in fact. N.J.S.A. 5:12-60b(1).
- C. Notwithstanding the provisions of paragraph B above, if the employment of an employee, other than an employee who held a policy-making management position at any time during the five years prior to termination of employment, is terminated as a result of a reduction in the workforce at the DGE, the employee may, at any time prior to the end of the two-year period, accept employment with any applicant or person licensed or registered under the Act upon application to and the approval of the DGE, upon a finding that the employment will not create the appearance of a conflict of interest and does not evidence a conflict of interest in fact. The DGE shall take action on such an application within 30 days of receipt, and such an application may be submitted to the DGE prior to or after the commencement of the employment. N.J.S.A. 5:12-60b(2).
- D. No employee shall represent any person or party other than the State before or against the CCC or DGE for a period of two years from the termination of his office or employment with the DGE. N.J.S.A. 5:12-60c.
- E. No partnership, firm or corporation in which a former DGE employee has an interest, nor any partner, officer or employee of any such partnership, firm or corporation shall make any appearance or representation which is prohibited to said former DGE employee; provided, however, that nothing herein shall prohibit such partnership, firm or corporation from making such appearance or representation on behalf of a casino service industry enterprise registered under N.J.S.A. 5:12-92c. N.J.S.A. 5:12-60d.
- F. Notwithstanding any post-employment restriction imposed by this section, nothing herein shall prohibit a former DGE employee, at any time after termination of such employment, from acquiring an interest in, or soliciting or obtaining employment with, any person registered as a casino service industry enterprise under N.J.S.A. 5:12-92c. N.J.S.A. 5:12-60e.

## **Section VII Compensation for Published Works**

No employee shall solicit, receive or agree to receive any compensation for any published work without the prior approval of the Director in accordance with Section XII of the UEC and Section XII of the Department Code.



## **Section VIII Family Members Conflicts of Interest: Cohabitants and Relatives**

- A. Any employee who cohabits with any registrant, employee of a casino licensee or applicant, or any holding, intermediary or subsidiary company thereof, or any qualifier of any licensed casino service industry as defined by the Act and regulations promulgated thereunder, or who is employed by a New Jersey gaming entity, an out of State gaming entity, or an out of State regulatory agency, or a person interested in gaming shall file a disclosure of the relevant facts with the Director, in a form to be provided by the DGE. Such disclosures shall be re-filed annually, not later than January 31 of each year, during such period of time as the cohabitation shall continue. Failure to file such disclosure, or the filing of a false disclosure, shall be grounds for appropriate disciplinary action.
- B. Any employee who is related by blood, marriage, civil union or domestic partnership to a registrant, employee of a casino licensee or applicant, or any holding, intermediary or subsidiary company thereof, or any qualifier of a licensed casino service industry as defined by the Act and regulations promulgated thereunder, or any person who is employed by or doing business with a New Jersey gaming entity, an out of State gaming entity, an out of State regulatory agency, or a person interested in gaming, shall file a disclosure of the relevant facts with the Director, in a form to be provided by the Division. Such disclosures shall be re-filed annually, not later than January 31 of each year, during such period of time as the employment of the relative shall continue. Failure to file such disclosure, or the filing of a false disclosure, shall be grounds for appropriate disciplinary action.
- C. Upon review of the disclosures made pursuant to this section, the Director shall make such assignments and take such action as is necessary to preserve the integrity of the DGE and prevent any actual or perceived conflicts of interest.

## **Section IX Reporting Complaints**

Any complaint alleging a violation of this Code received by the DGE, whether anonymously or from an employee or member of the public, shall be promptly referred to the AELO, who shall forward the complaint to the DELO for review and referral to the SEC.

## **Section X Penalties**

Any employee who willfully violates the COIL, the Act, the Department Code or this Code may be subject to criminal sanctions, including fine and imprisonment, and to civil penalties, including fine, suspension, removal, demotion or other disciplinary action.

### **Effective Date:**

This Code shall take effect immediately and supersedes all previous codes of ethics the DGE has promulgated. Any administrative directive or other policy or guidance previously issued with respect to such codes that conflicts with the provisions of this Code are hereby rescinded. Formally approved by the SEC on December 4, 2012.