



*State of New Jersey*  
STATE ETHICS COMMISSION

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September 21, 2016

Valerie Hayes  
Ethics Liaison Officer  
Stockton University  
101 Vera King Farris Drive  
Galloway, New Jersey 08205-9441

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

Dear Ms. Hayes:

At its September 20, 2016 meeting, the State Ethics Commission considered your request on behalf of Amber Watts, Clerk Typist, Stockton University ("Stockton"), and her brother, Larry Watts. Mr. Watts is currently employed by the Borgata Hotel, Casino and Spa as a security specialist. 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:

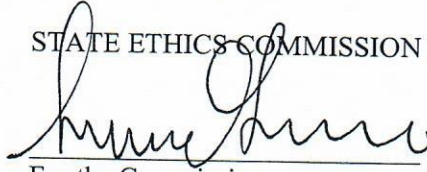
except that ... a member of the immediate family of a State officer or employee, or person, may hold employment with the holder of, or applicant for, a casino license if, in the judgment of the State Ethics Commission ... such employment will not interfere with the responsibilities of the State officer 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 Ms. Watts' position at Stockton and her brother's employment with the Borgata Hotel, Casino and Spa. Ms. Watts' position and her brother's casino employment do not overlap, and there is no conflict of interest or reasonable risk of the public perceiving any kind of conflict between her position and her brother's casino employment.

Based on the facts and circumstances set forth above, the Commission granted a waiver of the general prohibition of section 17.2(b) in the case of Amber Watts and her brother, Larry Watts.

Very truly yours,

STATE ETHICS COMMISSION

A handwritten signature in black ink, appearing to read "Susana Guerrero", written over a horizontal line.

For the Commission  
Susana E. Guerrero, Executive Director

SEG/sc

*Exit\_Watts\_CW\_9-2016*