



*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

**JOSEPH P. LASALA, ESQ.**  
CHAIR

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

June 6, 2019

Catherine Schafer  
Ethics Liaison Officer  
Department of Children and Families  
50 East State Street  
PO Box 171  
Trenton, New Jersey 08625

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

Dear Ms. Schafer:

At its June 6, 2019 meeting, the State Ethics Commission considered your request on behalf of Lacheiar Clark, Assistant Family Service Worker, Department of Children and Families, whose husband, Aharon Keitt, is employed by Bally's Hotel and Casino as a security manager. 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

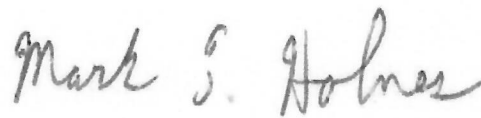
....

The Commission agrees that there is no conflict between Ms. Clark's position at Department of Children and Families and her husband's employment with Bally's Hotel and Casino. Ms. Clark's position and her husband's 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 husband'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 Lacheiar Clark and her husband, Aharon Keitt.

Very truly yours,

STATE ETHICS COMMISSION

A handwritten signature in cursive script that reads "Mark T. Holmes".

---

For the Commission  
Mark T. Holmes  
Executive Director

MTH/sc

*Exit\_Clark\_CW\_DHS\_6-2019*