



*State of New Jersey*  
STATE ETHICS COMMISSION

PO Box 082  
TRENTON, NJ 08625-0082  
[WWW.NJ.GOV/ETHICS](http://WWW.NJ.GOV/ETHICS)

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LT. GOVERNOR

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CHAIR

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

January 30, 2019

Robert Strong  
Ethics Liaison Officer  
Department of Human Services  
Division of Developmental Disabilities  
P.O. Box 726  
Trenton, NJ 08625-0340

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

Dear Mr. Strong:

At its January 29, 2019 meeting, the State Ethics Commission considered your request on behalf of Elisa Ford, Habilitation Plan Coordinator, Division of Developmental Disabilities, Department of Human Resources, whose brother, Wyatt Ford, is currently employed by Ocean's Resort and Casino as a food runner-expeditor. 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:

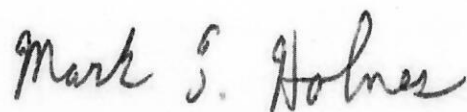
except that ... a member of the immediate family of a State officer or employee, or person, may hold employment with the holder of, or applicant for, a casino license if, in the judgment of the State Ethics Commission ... such employment will not interfere with the responsibilities of the State officer 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. Ford's position at Department of Human Services and her brother's employment with the Ocean's Resort and Casino. Ms. Ford's position and her brother'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 brother'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 Elisa Ford and her brother, Wyatt Ford.

Very truly yours,

STATE ETHICS COMMISSION

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

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For the Commission  
Mark T. Holmes  
Executive Director

MTH/sc

*Exit\_Ford\_CW\_DHS\_1-2019*