

State of New Jersey

STATE ETHICS COMMISSION

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ACTING EXECUTIVE DIRECTOR

March 14, 2018

William Spearman
Ethics Liaison Officer
South Jersey Transportation Authority
Farley Service Plaza
PO Box 351
Hammonton, New Jersey 08037

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

Dear Mr. Spearman:

At its March 13, 2018 meeting, the State Ethics Commission considered your request on behalf of Susan Lubrano, project manager, South Jersey Transportation Authority ("SJTA"), who is also currently employed by Harrah's Casino as a bartender. 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 (1) a State officer or employee other than a State officer or employee included in the definition of person, and (2) a member of the immediate family of a State officer or employee, or of a 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

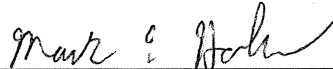
interest, or reasonable risk of the public perception of a conflict of interest, on the part of the State officer or employee, or person

The Commission agrees that there is no conflict between Ms. Lubrano's position at SJTA and her employment with Harrah's Casino. Ms. Lubrano's position and her casino employment do not overlap, and there is no conflict of interest or a reasonable risk of the public perceiving any kind of conflict between her position at SJTA and her secondary 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 Susan Lubrano.

Very truly yours,

STATE ETHICS COMMISSION



For the Commission

Mark T. Holmes

Acting Executive Director

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