



State of New Jersey
STATE ETHICS COMMISSION
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December 8, 2016

Robert K. Strong
Ethics Liaison Officer
Division of Developmental Disabilities
Department of Human Services
PO Box 726
Trenton, NJ 08625

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

Dear Mr. Strong:

At its December 6, 2016 meeting, the State Ethics Commission considered your request on behalf of Terri Peterson, Switchboard Operator, Woodbine Developmental Center, Division of Developmental Disabilities, Department of Human Services ("DDD"), who is seeking employment at the Borgata Hotel, Casino & Spa as a slot associate. 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 judgement of the State Ethics Commission ... such employment will not interfere with the responsibilities of

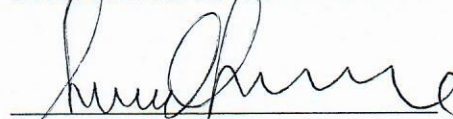
the State officer or employee, or person, and will not create a conflict of interest, or reasonable risk of the public perception of a conflict of interest, on the part of the State officer or employee, or person

The Commission agrees that there is no conflict between Ms. Peterson's position at DDD and her being employed by the Borgata Hotel, Casino & Spa. Ms. Peterson's position and her casino employment would 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 DDD 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 Terri Peterson.

Very truly yours,

STATE ETHICS COMMISSION



For the Commission

Susana E. Guerrero, Executive Director