



*State of New Jersey*  
STATE ETHICS COMMISSION  
PO Box 082  
Trenton, NJ 08625-0082  
[www.nj.gov/ethics](http://www.nj.gov/ethics)

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

ANDREW S. BERNES, Esq.  
*Chair*

SUSANA E. GUERRERO, Esq.  
*Executive Director*

*Tel: (609) 292-1892  
(888) 223-1355 in NJ  
Fax: (609) 633-9252  
Email: [ethics@ethics.state.nj.us](mailto:ethics@ethics.state.nj.us)*

December 3, 2014

Bonny E. Fraser  
Director, Office of Legal and Regulatory Affairs  
Department of Human Services  
PO Box 700  
Trenton, NJ 08625

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

Dear Ms. Fraser:

At its December 2, 2014 meeting, the State Ethics Commission considered your request on behalf of Kristina Buhl, Guardian Specialist, Bureau of Guardianship Services, Department of Human Services and her daughter, Elizabeth Buhl, a waitress employed by the Resorts Casino and Hotel. 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:

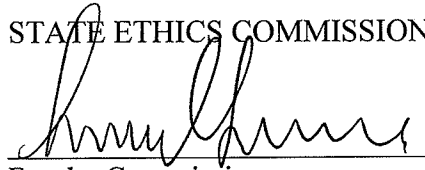
except that a member of the immediate family of a State officer or employee, or person, may hold employment with the holder of, or applicant for, a casino license if, in the judgment of the State Ethics Commission ... such employment will not interfere with the responsibilities of the State officer or 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 since Ms. Buhl's position does not require her to interact with her daughter, and given that she will be screened from any documents or filings related to her, there is no reasonable risk of the public perceiving any kind of conflict of interest between Ms. Buhl's position and her daughter's employment. As you also indicated, the waiver would be subject to the condition that she notify the Commission if Ms. Buhl's job responsibilities or licensing requirements change and that Ms. Buhl be screened from any information related to her daughter's key license, including but not limited to its resubmission or any action initiated by the Division against her key license.

Based on the facts and circumstances set forth above, the Commission then granted the waiver of the general prohibition of section 17.2(b) in the case of Kristina Buhl and her daughter Elizabeth Buhl.

Very truly yours,

STATE ETHICS COMMISSION



For the Commission

Susana E. Guerrero, Executive Director

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