

PASSAIC VALLEY SEWERAGE COMMISSIONERS

CODE OF ETHICS

Adopted: June 19, 2008
Revised: February 1, 2011

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
I. DEFINITIONS	3
II. GENERAL STANDARDS OF CONDUCT	5
III. ACCEPTANCE OF GIFTS	7
IV. ATTENDANCE AT EVENTS	8
V. POLITICAL ACTIVITY	9
VI. OUTSIDE ACTIVITIES AND BUSINESS INTERESTS	10
VII. OFFICIAL STATIONERY	11
VIII. POST-EMPLOYMENT RESTRICTIONS	12
IX. RECUSAL ON OFFICIAL MATTERS	14
X. CONTRACTS	15
XI. COMPENSATION FOR PUBLISHED WORKS	16
XII. INTERPERSONAL CONFLICTS OF INTEREST	17
XIII. REPORTING COMPLAINTS	18
XIV. PENALTIES	19
Appendix A – Request for Attendance at Outside Event	20
Appendix B – Outside Activity Questionnaire	21

I. DEFINITIONS

As used in this Code of Ethics, and unless a different meaning clearly appears from the context, the following terms shall have the following meanings.

“Agent” means any person hired to act for PVSC in the conduct of its business.

“Commissioner” means a member of the Passaic Valley Sewerage Commissioners appointed pursuant to N.J.S.A. 58:14-3.

“Conflicts Law” means the New Jersey Conflicts of Interest Law, N.J.S.A. 52:13D-12, et seq.

“Employee” means any individual employed by PVSC pursuant to N.J.S.A. 58:14-6.

“Ethics Liaison Officer” means the individual designated by PVSC to assist in the implementation and enforcement of the Conflicts Law and PVSC’s Code of Ethics.

“Event” means a meeting, conference, seminar, speaking engagement, symposium, training course, ground-breaking, ribbon-cutting, meal, open house, cocktail party, fundraiser, holiday party, social function, or similar event that takes place away from the PVSC official's work location, is sponsored or co-sponsored by a supplier or a non-State government source and the invitation for which is extended to the PVSC official because of his/her official position with PVSC.

“Executive Director” shall mean the person appointed by the Commissioners pursuant to N.J.S.A. 58:14-6 as the chief executive officer of PVSC.

“Gift” means any fee, commission, service, compensation, gratuity, or other thing of value of any kind. If an item has more than a minimal monetary value, it will be characterized as a gift.

“Immediate Family Member” means an individual's spouse, child, parent or sibling residing in the same household.

“Interest” means (1) the ownership or control of more than 10% of the profits or assets of a firm, association, or partnership, or more than 10% of the stock in a corporation for profit other than a professional service corporation organized under the “Professional Service Corporation Act,” P.L. 1969, c. 232 (C. 14A:17-1 et seq.) The provisions of this act governing the conduct of individuals are applicable to shareholders, associates or professional employees of a professional service corporation regardless of the extent or amount of their shareholder interest in such a corporation.

“Interested party” means: (1) any person, or employee, representative or agent thereof, who is or may reasonably be anticipated to be subject to the regulatory, licensing or supervisory authority of PVSC; (2) any supplier, or employee, representative or agent thereof; (3) any

organization that advocates or represents the positions of its members to PVSC; or (4) any organization a majority of whose members are as described in paragraphs 1 through 3 above.

"N.J.S.A. 52:13D-12, et seq." or any reference to a section of same means the New Jersey Conflicts of Interest law or Conflicts Law.

"Officers" means those individuals selected by the Commissioners to serve in official capacities, such Executive Director, Clerk or Chief Financial Officer.

"Person" means any natural person, association or corporation.

"Published work" means any tangible medium of expression, including, but not limited to, literary, pictorial, graphic and sculptural matter; sound recordings; and software.

"PVSC" means the body politic and corporate created pursuant to N.J.S.A. 58:14-1, et seq., legally known as the Passaic Valley Sewerage Commissioners.

"Relative," as used in section XIII, means an individual's spouse, and the individual's or his/her spouse's parent, child, sibling, aunt, uncle, niece, nephew, grandparent, grandchild, son-in-law, daughter-in-law, stepparent, stepchild, stepbrother, stepsister, half-brother, or half-sister, whether the relative is related to the individual or the individual's spouse by blood, marriage or adoption.

"Supplier" means any person that is providing or is seeking to provide or may reasonably be expected to provide goods and/or services to PVSC, including, but not limited to, consultants, vendors and lessors.

II. GENERAL STANDARDS OF CONDUCT

It is essential that the conduct of PVSC Commissioners, officers, employees and agents shall hold the respect and confidence of the people. PVSC officers, employees and agents must, therefore, avoid conduct that is in violation of their public trust or that creates a justifiable impression among the public that such trust is being violated. Accordingly, PVSC Commissioners, officers, employees and agents shall conform their conduct to the following standards:

A. No PVSC Commissioner, officer, employee or agent should have any interest, financial or otherwise, direct or indirect, or engage in any business or transaction or professional activity which is in substantial conflict with the proper discharge of his/her duties in the public interest.

B. No PVSC Commissioner, officer, employee or agent should engage in any particular business, profession, trade or occupation which is subject to licensing or regulation by a specific agency of State Government without promptly filing notice of such activity with PVSC's Ethics Liaison Officer.

C. No PVSC Commissioner, officer, employee or agent should use or attempt to use his/her official position to secure unwarranted privileges or advantage for him/herself or others.

D. No PVSC Commissioner, officer, employee or agent should act in his/her official capacity in any matter wherein he/she has a direct or indirect personal financial interest that might reasonably be expected to impair his/her objectivity or independence of judgment.

E. No PVSC Commissioner, officer, employee or agent should undertake any employment or service, whether compensated or not, which might reasonably be expected to impair his/her objectivity or independence of judgment in the exercise of his/her official duties.

F. No PVSC Commissioner, officer, employee or agent should accept any gift, favor, service or other thing of value under circumstances from which it might be reasonably inferred that such gift, favor, service or other thing of value was given or offered for the purpose of influencing him/her in the discharge of his/her official duties.

G. No PVSC Commissioner, officer, employee or agent should knowingly act in any way that might reasonably be expected to create an impression or suspicion among the public having knowledge of his/her acts that he/she may be engaged in conduct violative of his trust as a PVSC Commissioner, officer, employee or agent.

H. No PVSC Commissioner, officer, employee or agent shall willfully disclose to any person, whether or not for pecuniary gain, any information not generally available to members of the public which he/she receives or acquires in the course of and by reason of his/her official duties. No PVSC Commissioner, officer, employee or agent shall use for the purpose of pecuniary gain, whether directly or indirectly, any information not generally available to

members of the public which he/she receives or acquires in the course of and by reason of his/her official duties.

I. No PVSC Commissioner, officer, employee or agent, nor any partnership, firm or corporation in which he/she has an interest, nor any partner, officer or employee of any such partnership, firm or corporation, shall represent, appear for, or negotiate on behalf of, or agree to represent, appear for, or negotiate on behalf of, any person or party other than PVSC in connection with any cause, proceeding, application or other matter pending before PVSC. Nothing contained herein shall be deemed to prohibit any such partnership, firm or corporation from appearing on its own behalf.

Nothing contained in this section shall be deemed to prohibit any PVSC Commissioner, officer, employee or agent from representing, appearing for or negotiating on behalf of, or agreeing to represent, appear for, or negotiate on behalf of, any person or party other than PVSC in connection with any proceeding:

1. Pending before any court of record of this State;
2. In regard to a claim for compensation arising under chapter 15 of Title 34 of the Revised Statutes (Workers' Compensation);
3. In connection with the determination or review of transfer inheritance or estate taxes;
4. In connection with the filing of corporate or other documents in the office of the Secretary of State;
5. Before the Division on Civil Rights or any successor thereof;
6. Before the New Jersey State Board of Mediation or any successor thereof;
7. Before the New Jersey Public Employment Relations Commission or any successor thereof;
8. Before the Unsatisfied Claim and Judgment Fund Board or any successor thereof solely for the purpose of filing a notice of intention pursuant to P.L.1952, c.174, s.5 (C.39:6-65); or
9. Before any State agency on behalf of a county, municipality or school district, or any authority, agency or commission of any thereof except where the State is an adverse party in the proceeding and provided he is not holding any office or employment in the State agency in which any such proceeding is pending.

III. ACCEPTANCE OF GIFTS

No PVSC Commissioner, officer, employee or agent shall accept any gift, favor, service or other thing of value related in any way to the that person's public duties.

PVSC has adopted a zero tolerance policy for acceptance of gifts. Accordingly, any gift that is offered to or received by a Commissioner, officer, employee or agent or, his/her spouse, immediate family member, partner or associate shall be immediately reported to PVSC's Ethics Liaison Officer ("ELO"). Unless the Commissioner, officer, employee or agent is permitted to receive the gift or thing of value in accordance with PVSC's rules on attendance at events (see section IV), no Commissioner, officer, employee or agent or, his/her spouse, immediate family member, partner or associate shall accept, either directly or indirectly, any gift, favor, service or other thing of value related in any way to the Commissioner's, officer's, employee's or agent's public duties.

The exceptions to the zero tolerance rules for acceptance of gifts are set forth below:

1. Unsolicited gifts or benefits of trivial or nominal value, such as complimentary articles offered to the public in general, and gifts received as a result of mass advertising mailings to the general business public may be retained by the recipient or the recipient's department for general use if such use does not create an impression of a conflict of interest or a violation of the public trust. The receipt of such complimentary articles is not required to be reported to the ELO.
2. A Commissioner, officer, employee or agent may receive a gift, favor, service or other thing of value from a vendor under the same terms and conditions as are offered or made available to members of the general public.
3. A Commissioner, officer, employee or agent is permitted to give or receive a gift from a co-worker, a supervisor or a subordinate. The gift should not be excessive or inappropriate for a business environment. Such gift shall not be reported to the ELO.
4. In accordance with N.J.S.A. 52:13D-24, gift provisions do not apply to the acceptance of contributions to the campaign of an announced candidate for elective public office.

In addition, the following guidelines governing the receipt of gifts and favors shall be followed:

5. All PVSC Commissioners, officers, employees and/or agents are required to fully disclose in writing to PVSC's ELO the receipt of any gift or any other thing of value related in any way to that person's public duties.
6. The ELO shall monitor compliance with specific procedures under which personnel shall proceed upon receipt of a gift or any other thing of value related in any way to their public duties.

7. All Commissioners, officers, employees or agents should be instructed that any gift or other thing of value offered to or by a Commissioner, officer, employee or agent that is related in any way to his/her public duties must be reported and remitted immediately to the ELO. Similarly, any favor, service, employment or offer of employment from such person or corporation must be reported immediately.

8. The ELO shall return a gift or thing of value that is related in any way to a Commissioner, officer, employee or agent officer or employee's public duties to the donor or shall otherwise appropriately dispose of it.

9. Unsolicited gifts or benefits of trivial or nominal value, such as complimentary articles offered to the public in general, and gifts received as a result of mass advertising mailings to the general business public may be retained by the recipient or the recipient's department for general use if such use does not create an impression of a conflict of interest or a violation of the public trust. An impression of a conflict may be created, for example, if an employee of a regulatory agency uses a pocket calendar conspicuously marked with the name of a company that it regulates or if an office in a State agency displays a wall calendar from a vendor, creating the impression of an endorsement.

10. The ELO will have the responsibility of keeping the records of all such occurrences; names of the employees, individuals, and companies involved, and the final disposition of the gift or thing of value.

11. The assistance of the Director of the New Jersey State Ethics Commission will be available to the ELO to aid him or her in individual cases.

IV. ATTENDANCE AT EVENTS

Attendance at an event that is sponsored or co-sponsored by an entity other than PVSC must be approved by the Executive Director or, in the case of events which are out-of-state and require air travel, by the Commissioners.

A PVSC employee must complete a "Request For Approval To Attend Event" form prior to attendance, a copy of which is attached hereto as Appendix A. Forms shall be available from the Ethics Liaison Officer.

A PVSC employee shall not attend an event in his or her official capacity unless a legitimate PVSC purpose will be served.

Costs associated with attendance at an event shall be paid or reimbursed by PVSC in accordance with PVSC policy and/or according to contractual provisions.

A PVSC employee is prohibited from accepting honoraria in connection with his/her attendance or participation at an event.

A PVSC employee is prohibited from accepting entertainment, or reimbursement for entertainment, that is collateral to an event other than in a group setting offered to all attendees.

V. POLITICAL ACTIVITY

Upon giving notice to the Ethics Liaison Officer, PVSC personnel may be involved in political activities unless:

- A. the PVSC employee is prohibited from such activities by State or federal statute or PVSC rule; or
- B. the political activity conflicts with the employee's official duties.

Pursuant to N.J.S.A. 52:13D-14 and N.J.S.A. 52:13D-24 of the New Jersey Conflict Law, PVSC personnel may accept a contribution to the campaign of an announced candidate for elective public office provided the contribution is not known to be given in lieu of a payment that is prohibited by the Conflicts Law.

Further, all PVSC personnel shall comply with and be subject to N.J.A.C. 4A:10-1.2 governing political activity, specifically as same applies to career service employees.

Finally, no PVSC employee is permitted to serve as a campaign treasurer on any campaign that is subject to the jurisdiction of the Election Law Enforcement Commission.

VI. OUTSIDE ACTIVITIES AND BUSINESS INTERESTS

No PVSC Commissioner, officer, employee or agent should undertake any employment or service, whether compensated or not, which might reasonably be expected to impair his/her objectivity and independence of judgment in the exercise of his /her official duties.

A PVSC Commissioner, officer, employee or agent's participation in any service, activity or employment that is outside his/her official PVSC duties may be prohibited by the Conflicts Law, other State or Federal law or regulation, or any code of ethics adopted by PVSC. Accordingly, a PVSC Commissioner, officer, employee or agent shall obtain the approval of the Ethics Liaison Officer prior to engaging in any of the following outside activities:

A. Commencement of any business, trade, profession or other compensated employment, including the acceptance of compensation for a speech or published work;

B. Uncompensated or volunteer work for or with any entity other than a IRS §501(c)(3) non-profit or political campaign; or

C. Holding office or title in the governing or advisory board of any entity.

Notwithstanding the requirement to disclose outside employment and activities, PVSC may exempt disclosure of specific kinds of outside employment or activities if PVSC is satisfied that such activity or employment does not present a conflict of interest.

A PVSC Commissioner or officer who is subject to financial disclosure by law or executive order shall not be permitted to hold employment with, hold an interest in, or represent, appear for, or negotiate on behalf of a holder of or applicant for a casino license.

All PVSC Commissioners, officers, employees and agents shall complete the Outside Activity Questionnaire in accordance with the procedures adopted by PVSC. These procedures shall, at a minimum, require that all current PVSC personnel complete the questionnaire and that each new employee complete the questionnaire upon commencement of employment with PVSC. The procedures shall also require that a PVSC Commissioner, officer, employee or agent amend his/her Outside Activity Questionnaire whenever there is a change in the employee's outside activity or PVSC employment. PVSC shall require disclosure of additional information regarding the outside activities of its employees as necessary to address the particular needs and problems of PVSC.

The PVSC Ethics Liaison Officer shall review all outside activity questionnaires and determine whether the outside activity is permissible in accordance with the Conflicts Law and this Code of Ethics. A PVSC Commissioner, officer, employee or agent may appeal the Ethics Liaison Officer's decision to disapprove an outside activity. Such appeal shall be submitted in writing to the Executive Director within 60 days of the employee's receipt of the Ethics Liaison Officer's decision. The appeal shall cite the relevant section(s) of the Conflicts Law, this Code of Ethics or other authority which supports the position of the employee that such outside activity should be permitted.

VII. OFFICIAL STATIONERY

Official stationery shall be used only in connection with PVSC's official business. The limitations on use of official stationery also apply to personal stationery paid for by a PVSC Commissioner, officer, employee or agent if it is imprinted with "PVSC" or the title of the PVSC Commissioner, officer, employee or agent.

A PVSC Commissioner, officer, employee or agent may not use official stationery to promote a candidate for elective office, endorse a State vendor or contractor, express a personal opinion on a matter that is not related to his/her official duties, or to promote his/her financial or other self-interest.

Exceptions: A PVSC Commissioner, officer, employee or agent may use official stationery to write a letter of recommendation for, or respond to an inquiry about, a current or former colleague or employee. These permissible uses are only acceptable so long as the use of official stationery does not create an impression that the PVSC Commissioner, officer, employee or agent is engaged in an unwarranted use of his /her position. For example, it would not be appropriate for a PVSC employee to recommend an individual for inclusion in a program over which the PVSC employee has supervisory or regulatory authority. In addition, there must be a reasonable connection between the employee's official duties and the use and purpose of the letter.

PVSC may not use official stationery to solicit a contribution from any interested party. Solicitation of any other entity must be reviewed and approved by the agency's Ethics Liaison Officer.

VIII. POST-EMPLOYMENT RESTRICTIONS

A. Future Employment

PVSC Commissioners, officers, employees or agents who have direct and substantial contact with any interested parties must refrain from circulating resumes or in any manner seeking employment with those individuals or entities while still in PVSC service. If an employee is solicited for potential employment by an entity with which he/she has direct and substantial contact, that solicitation must be disclosed immediately to the PVSC's Ethics Liaison Officer. Employees who do not have direct and substantial contact with interested parties may circulate resumes and enter into discussions regarding potential employment with those individuals or entities so long as they avoid any situations that may give rise to an unwarranted advantage. All employees are cautioned that discussions, interviews, and negotiations shall not take place on PVSC time.

Solicitation or discussion of employment with regulated entities, or their representatives, that have a specific cause, proceeding, application or other matter pending before PVSC is not permitted. There may be circumstances when solicitation or discussion of employment with respect to regulated entities, or their representatives, could be approved if no specific cause, proceeding, application or other matter is pending before PVSC. These situations must be reviewed on a case-by-case basis before the employee proceeds with any job seeking activities.

B. Lifetime Ban

At no time subsequent to the termination of his/her office or employment with PVSC may a former PVSC Commissioner, officer, employee or agent represent, appear for, negotiate on behalf of, or provide information or services not generally available to members of the public, or agree to perform any of those activities, for any party other than PVSC in connection with a specific cause, proceeding, application or matter with which the PVSC Commissioner, officer, employee or agent had been substantially and directly involved at any time during the course of his/her office or employment. This lifetime ban applies not only to the PVSC Commissioner, officer, employee or agent personally, but also to the partnership, firm or corporation under the following circumstances: (1) if the former PVSC Commissioner, officer, employee or agent is a shareholder, associate or professional employee of a firm organized as a professional service corporation or (2) if the former PVSC Commissioner, officer, employee or agent owns or controls more than 10% of the stock of a corporation or more than 10% of the profits or assets of a firm, association or partnership.

C. One-Year Ban – Certain Officials

A one-year ban on the activities described in this section shall apply to any Commissioner, officer or employee at Step 16 and above.

For one year after the termination of the PVSC office or employment of any of the individuals noted above, he/she shall not represent, appear for, or negotiate on behalf of, or agree to represent, appear for, or negotiate on behalf of any person or party other than PVSC with or

before any officer or employee of PVSC. The provisions of this subsection shall not apply to any partnership, firm or corporation in which he/she has an interest or is employed, or to any partner, officer, director or employee of such partnership, firm or corporation. Nothing contained in this section shall prohibit PVSC from contracting with a former PVSC officer or employee to act on behalf of PVSC.

IX. RECUSAL ON OFFICIAL MATTERS

A PVSC Commissioner, officer, employee or agent is required to recuse him/herself, for one year after commencing PVSC service, on an official matter that involves any private sector individual, association, corporation or other entity that employed or did business with the PVSC Commissioner, officer, employee or agent during the year prior to the employee's commencement of PVSC service.

A PVSC Commissioner, officer, employee or agent is required to recuse him/herself on an official matter if he/she had any involvement in that matter, other than on behalf of the PVSC, prior to commencement of his /her PVSC service.

A PVSC Commissioner, officer, employee or agent is required to recuse him/herself on an official matter if he/she has a financial or personal interest that is incompatible with the proper discharge of his /her public duties.

An incompatible personal or financial interest includes, but is not limited to, outside employment; a debtor/creditor relationship; a fiduciary relationship; a source of income; any matter pertaining to or involving a relative or cohabitant; a relationship with a person providing funds, goods or services without compensation; any matter pertaining to or involving a business associate or business investment; and a leadership role in a professional or trade organization, which interest might reasonably be expected to impair a PVSC employee's objectivity and independence of judgment in the exercise of his/her official duties or might reasonably be expected to create an impression or suspicion among the public having knowledge of his or her acts that he/she may be engaged in conduct violative of his /her trust as a PVSC employee.

Upon determining that a PVSC employee shall recuse him/herself on any matter, the PVSC employee shall execute the recusal in writing or on the official record, and shall have no involvement with the subject matter of the recusal. If a PVSC employee cannot determine whether he/she should execute a letter of recusal in any matter, the employee shall contact the PVSC Ethics Liaison Officer for guidance. A PVSC employee shall seek the advice of PVSC's counsel or the Ethics Liaison Officer as to the propriety of participation in a matter if any person requests that a PVSC employee recuse him/herself from that matter. Oral advice, followed up by a writing, shall be provided by the agency's counsel or Ethics Liaison Officer to avoid delay. Oral advice shall subsequently be memorialized by a writing or by inclusion in public minutes.

X. CONTRACTS

With few exceptions, PVSC personnel may not enter into a contractual agreement with the State.

A. Limitation on contracting by a PVSC Commissioner, officer, employee or agent

Pursuant to N.J.S.A. 52:13D-19, no Commissioner, officer, employee or agent shall knowingly undertake or execute, in whole or in part, any contract, agreement, sale or purchase of the value of \$25.00 or more, made, entered into, awarded or granted by any State agency. With the prior approval of the Commissioners, however, a PVSC Commissioner, officer, employee or agent is permitted to enter into purchases, contracts, agreements or sales with other State agencies which are made or let after public notice and competitive bidding or which, in accordance with public bidding laws or regulations applicable to other State agencies, may be made, negotiated or awarded without public advertising for bids.

XI. COMPENSATION FOR PUBLISHED WORKS

A PVSC Commissioner, officer, employee or agent may not solicit, receive, or agree to receive, compensation from sources other than PVSC or the State of New Jersey for published work(s) created as part of his /her official duties on PVSC time and/or using PVSC resources.

However, a PVSC Commissioner, officer, employee or agent may, in connection with any service, advice, assistance, appearance, speech or other matter related to his/her official duties, receive or agree to receive, whether directly or indirectly, from sources other than PVSC or the State, reasonable fees for published works on matters within his/her official duties not created on PVSC time and/or using PVSC resources.

In addition, a PVSC Commissioner, officer, employee or agent may accept compensation from sources other than the PVSC or the State for published work(s) on matters unrelated to his/her official duties created on his/her own time and with non-PVSC resources.

Before agreeing to accept or accepting any compensation from a source other than the PVSC or the State for any published work, a PVSC Commissioner, officer, employee or agent must secure PVSC's approval to do so.

In determining whether to grant such approval, PVSC shall consider, among other things, whether the compensation is offered by an interested party, and whether the published work uses or discloses information not generally available to the public. The determination shall be consistent with applicable law and agency policy.

No PVSC Commissioner, officer, employee or agent may use his/her official title in soliciting compensation for a published work..

XII. INTERPERSONAL CONFLICTS OF INTEREST

A. Commencing March 15, 2006, PVSC shall not appoint or hire:

- 1. a relative of the Governor for employment in any unclassified office or position; or**
- 2. a relative of a Commissioner.**

B. No PVSC Commissioner, officer, employee or agent may supervise his/her relative or exercise any authority with regard to personnel actions involving his/her relative. This section shall also apply to non-related individuals who share the same household with the same financial interdependence that PVSC views as creating a conflict in spousal situations.

C. PVSC shall require Commissioners, officers, employees or agents and employees to disclose information sufficient for PVSC to determine whether the employment of any individual within the agency is prohibited.

D. It shall be a violation of the Conflicts Law for a PVSC Commissioner, officer, employee or agent to have any involvement in his/her official capacity in any matter that pertains to or involves an individual with whom he/she has a dating relationship.

XV. REPORTING COMPLAINTS AND COMPLAINTS PROCEDURE

Allegations that a PVSC Commissioner, officer, employee or agent has violated a provision of this Ethics Code, the Conflicts Law or any other standard should be reported to the Ethics Liaison Officer. Allegations should contain as much detailed information as possible and, if the complainant chooses to identify him/herself, should include contact information so that the Ethics Liaison Officer can obtain additional information if necessary. A complainant is not required to disclose his/her identity when reporting an alleged ethics violation.

XVI. PENALTIES

A violation of PVSC's Code of Ethics or the Conflicts Law shall be cause for removal, suspension, demotion or other disciplinary action by PVSC. Violations shall, in appropriate cases, also be referred to appropriate law enforcement officials for prosecution.

Any person who willfully induces or attempts to induce a PVSC Commissioner, officer, employee or agent to violate any of the provisions of the Conflicts Law shall be subject to the penalty as stated in the Conflicts Law, that is, a disorderly persons offense, and shall be subject to a fine not to exceed \$500 or imprisonment not to exceed 6 months, or both.