



State of New Jersey
STATE ETHICS COMMISSION
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July 13, 2017

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 July 12, 2017 meeting, the State Ethics Commission considered your request on behalf of Michael Brandenberger, Jr., firefighter, South Jersey Transportation Authority ("SJTA"), and his father-in-law, Detlef Ams. Mr. Ams is currently employed by Caesar's Entertainment as a limousine driver. 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 Mr. Brandenberger's position at SJTA and his father-in-law's employment with Caesars Entertainment. Mr. Brandenberger's position and his father-in-law's casino employment do not overlap, and there is no conflict of interest or reasonable risk of

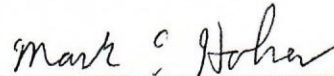
Page 2
July 13, 2017

the public perceiving any kind of conflict between his State position and his father-in-law's 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 Michael Brandenberger, Jr. and his father-in-law, Detlef Ams.

Very truly yours,

STATE ETHICS COMMISSION



For the Commission
Mark T. Holmes, Deputy Director

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