



*State of New Jersey*  
STATE ETHICS COMMISSION  
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CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

October 22, 2015

Kimberly Ward  
Ethics Liaison Officer  
NJ Casino Reinvestment Development Authority  
2314 Pacific Avenue  
Atlantic City, New Jersey 08401

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

Dear Ms. Ward:

At its October 20 2015 meeting, the State Ethics Commission considered your request on behalf of Ronald Shannon, Maintenance Worker, Special Improvement Division, Casino Reinvestment Development Authority ("CRDA"), and his sister, Andrea Shannon. Ms. Shannon is currently employed by Bally's Casino as a dealer. 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

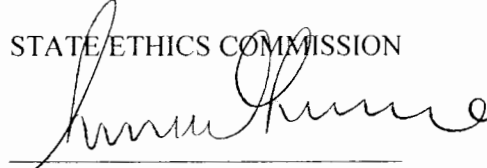
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The Commission agrees that there is no conflict between Mr. Shannon's position at CRDA and his sister's employment with Bally's Casino. His State position and his sister's casino employment do not overlap, and there is no reasonable risk of the public perceiving any kind of conflict between Mr. Shannon's position and his sister's casino employment.

Based on the facts and circumstances set forth above, the Commission granted the waiver of the general prohibition of section 17.2(b) in the case of Ronald Shannon and his sister, Andrea Shannon.

Very truly yours,

STATE ETHICS COMMISSION

A handwritten signature in black ink, appearing to read "Susana Guerrero", written over a horizontal line.

For the Commission  
Susana E. Guerrero, Executive Director

SEG/sc

*Exit Shannon CW 10-2015*