

VIRGIN ISLANDS OF THE UNITED STATES

CASINO CONTROL COMMISSION



CODE OF ETHICS

FOR

COMMISSION MEMBERS AND EMPLOYEES

(Adopted October 21, 20/6: Source: New Jersey Casino Control Commission)

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GENERAL PROVISIONS

A. Statement of Policy

In the discharge of its powers, duties and responsibilities, the Virgin Islands Casino Control Commission conducts its business consistent with high ethical standards. Commission members and employees are expected to perform their duties with undivided loyalty and in such a manner as to promote and preserve public trust and confidence. Commission members and employees shall avoid all situations where opportunity for personal or financial gain could influence their decisions in giving favored treatment to any organization or person. They shall also avoid circumstances and conduct which might appear questionable to the general public, even if such circumstances or conduct do not constitute actual wrongdoing or present an actual conflict of interest. In order to promote public confidence in the integrity and impartiality of the Commission, Commission members and employees shall respect and comply with the law, and establish, maintain and enforce high standards of conduct.

This Code of Ethics recognizes that under our democratic form of government, public officials and employees should be drawn from all segments of our society; that citizens who serve in the government cannot and should not be expected to be without personal interest in the decisions and policies of government; that citizens who are Commission members and employees have a right to private interests of a personal, financial and economic nature; and that standards of conduct should separate those conflicts of interest which are unavoidable in a free society from those conflicts of interest which are substantial and material, or which bring government into disrepute.

B. Definitions

The following words and terms, when used in this Code of Ethics, shall have the following meanings unless the context clearly indicates otherwise:

Act means the VI Casino and Resort Control Act of 1995

Cohabit means to reside in a house, apartment or other living quarters with any other person.

Cohabitant means any person with whom a person cohabits.

Commission means the Virgin Islands Casino Control Commission.

Commission employee means an individual employed by the VI Casino Control Commission.

Commission member means an individual appointed to the Commission pursuant to the V.I. Casino and Resort Control Act of 1995.

Conflict-of-Interest Law means the V.I. Conflict of Interest law "**Consultant**" means an individual who is under contract to provide services to the Commission, and who is not a full-time or part-time employee of the Commission.

CSI means any enterprise that is determined to be a casino service industry in accordance with V.I. Casino and Resort Control Act of 1995.

Gaming-related CSI licensee or applicant means the holder of a CSI license issued pursuant to V.I. Casino and Resort Control Act of 1995 or any applicant for such a license.

Holding company is defined by V.I. Casino and Resort Control Act of 1995 to mean any corporation, association, firm, partnership, trust or other form of business organization not a natural person which directly or indirectly owns, has the power or right to control, or has the power to vote any significant part of the outstanding voting securities of a corporation which holds or has applied for a casino license, however many subsidiaries may intervene between the holding company and the licensee or applicant.

Intermediary company is defined by V.I. Casino and Resort Control Act of 1995 to mean any corporation, association, firm, partnership, trust or any other form of business organization not a natural person, which is a holding company with respect to a corporation which holds or has applied for a casino license and is a subsidiary with respect to any holding company.

Licensee, registrant or applicant means any person licensed by or registered with the Commission and any applicant for such licensure or registration.

Member of the immediate family of a person means that person's spouse, child, parent or sibling residing in the same household.

Nongaming-related CSI licensee or applicant means the holder of a casino service industry license issued pursuant to V.I. Casino and Resort Control Act of 1995 or any applicant for such a license.

Person means a corporation, association, operation, partnership, trust or other form of business association as well as a natural person.

Policy-making management position is defined by V.I. Casino and Resort Control Act of 1995

Qualifier of a licensed CS" means a person who is required to establish his or her qualifications pursuant to V.I. Casino and Resort Control Act of 1995 in connection with the application for licensure of a CSI enterprise.

Relative means a spouse, parent, child, sibling, grandparent, grandchild, uncle, aunt, nephew, niece, father-in-law, mother-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, or first cousin, whether in whole or half blood, by marriage, adoption or natural relationship, and the spouse of any such person.

Subsidiary company is defined by V.I. Casino and Resort Control Act of 1995 to mean:

(a) Any corporation, any significant part of whose outstanding equity securities are owned, subject

to a power or right of control, or held with power to vote, by a holding company or an intermediary company; or (b) A significant interest in any firm, association, partnership, trust or other form of business organization not a natural person, which is owned, subject to a power or right of control, or held with power to vote, by a holding company or an intermediary company.

C. Standards of Conduct

Commission members and employees are governed by ethical standards set forth in the Act, Commission rules and this Code of Ethics. As employees of the

Government of the Virgin Islands, Commission members and employees are also governed by ethical standards set forth in the Conflict of Interest Laws of the Territory.

It is the responsibility of each Commission member and employee to comply with all applicable statutory and regulatory provisions and any amendments thereto, whether or not such provisions and amendments are included in this Code of Ethics.

D. Continuing Obligations

It is the continuing duty of each Commission member and employee to review and assess his or her conduct in light of this Code of Ethics. A Commission member or employee has an affirmative obligation to request advice when he or she has any reasonable doubt regarding the propriety of his or her past, present or future conduct or the conduct of any other Commission member or employee, or if he or she has any question regarding the applicability or meaning of any provision of this Code of Ethics or any other restriction.

ARTICLE II. PRE-EMPLOYMENT RESTRICTIONS

A. Prior Employment and Interests

1. No person shall be appointed to or employed by the Commission if, at any time during the three years prior to appointment or employment, he or she was employed

by, or held any direct or indirect interest in, a casino licensee or applicant, or a gaming-related CSI licensee or applicant, except that:

(a) Such person may be employed by the Commission in a secretarial or clerical position if the Commission determines that the previous employment or interest would not interfere with the objective discharge of such person's employment obligations; or

(b) Such person may be employed by the Commission if his or her interest in a licensee or applicant was not a controlling interest and if the Commission determines that such interest would not interfere with the objective discharge of his or her employment obligations.

2. Prior to appointment or employment, each Commission member and employee shall certify in writing that he or she possesses no interest in any person licensed by or registered with the Commission.

ARTICLE III. RESTRICTIONS APPLICABLE TO MEMBERS AND EMPLOYEES DURING APPOINTMENT OR EMPLOYMENT

A. Outside employment

1. Except as provided herein, the Act requires that Commission members and employees devote their entire vocational time and attention to their Commission duties. Therefore, a Commission member shall not pursue any other business, occupation or

employment while working for the Commission. A Commission employee shall not pursue any other business, occupation or employment while working for the Commission unless such activities satisfy the following requirements:

2. No Commission employee shall hold employment with a casino licensee or applicant, a holding company or intermediary company or a gaming related CSI licensee or applicant. A
3. Commission employee may hold employment with a non-gaming-related CSI licensee or applicant, or with any registrant, provided that the employee complies with all requirements otherwise applicable under Article III.A and that such employment does not, in the Commission's determination, present a real or apparent conflict of interest.
 - a) All Commission employees shall, in advance of accepting any outside employment or business responsibilities, advise the Commission of the prospective activity by completing a Commission employee certification form, and shall file such employee certification form annually thereafter during the course of employment.
 - b) A Commission secretarial or clerical employee may, without the prior approval of the Commission, engage in outside employment or business activity if it does not interfere with his or her duties to the Commission.
4. Any other Commission employee may, with the prior approval of the Commission, engage in an outside employment or business activity if it will not interfere with or conflict with his or her duties to the Commission.
 - a) No Commission employee shall engage in any employment which might reasonably be expected to impair his or her objectivity and independence of judgment in the exercise of his or her official duties.

If a Commission member or employee engages in any business, profession, trade or occupation that is licensed by any State agency, he or she must promptly file written notice of such activity with the Commission.

5. No Commission member or employee shall engage in any business or transaction or professional activity which is in substantial conflict with the discharge of his or her duties in the public interest.

6. No Commission member or employee in a policy-making management position shall have any personal contractual or business relationship with another Commission member or employee.

B. Representation

1. A Commission member or employee shall not represent, appear for or negotiate on behalf of:

- a) Any licensee, registrant or applicant or any holding company or intermediary company;
- b) Any person or party other than the State in connection with any cause, proceeding application or other matter pending before any State agency.

C. Interests

1. No Commission member or employee shall hold any direct or indirect interest in a licensee, registrant or applicant, including a holding company or intermediary company.

2. No Commission member or employee shall hold any direct or indirect interest, financial or otherwise, which is in substantial conflict with the discharge of his or her duties in the public interest.

3. No Commission employee, other than a secretarial or clerical employee, shall hold any direct or indirect interest in a closely-held corporation, partnership, sole proprietorship, or similar business entity except with the prior approval of the Commission. A Commission employee shall amend his or her financial disclosure

statement filed pursuant to Article III. I.2 of this Code of Ethics within 30 days of gaining knowledge of the employee's or his or her spouse's acquisition of any interest in such a business entity.

D. Political activity

1. A Commission member shall not engage in any political activity, including, without limitation, the following:

- (a) Acting as a leader or holding an office in a political organization;
- (b) Making speeches for a political organization or candidate or publicly endorsing a candidate for political office;
- (c) Attending political functions or functions that are likely to be considered as being political in nature; and
- (d) Soliciting funds for or paying any assessment or making any contribution to a political organization or candidate, or purchasing tickets for political party dinners or other functions.

2. A Commission member shall resign from office when he or she becomes a candidate either in a party primary or a general, special or municipal election for an elective public office.

3. A Commission member or employee shall not:

- (a) Use his or her official authority or influence for the purpose of interfering with or affecting the result of an election or a nomination for office;
- (b) Directly or indirectly coerce, attempt to coerce, command or advise any person to pay, lend or contribute anything of value to a party, committee, organization, agency or person for political purposes; or
- (c) Take any active part in political campaigns or the management thereof.

4. Nothing herein shall prohibit a Commission member or employee from voting as he or she chooses or expressing his or her personal opinions on political subjects and candidates.

E. Charitable and other outside activities

1. A Commission member shall not attend any convention, meeting, show, exhibition or other event, eat any meal, drink any beverage, or purchase any thing or service in any premises subject to licensure or approval by the Commission except in the course of the performance of his or her duties. However, a Commission member may attend a family or similar social gathering, or civic, charitable or professional association function, provided that:

(a) He or she does not permit payment for any such attendance
by any
other person, other than the host or sponsoring organization;

(b) He or she shall not, directly or indirectly, sponsor or
contract for such
gathering or function; and

(c) Prior to or within 48 hours after the event, he or she shall
file with the Chairman a statement identifying the location and circumstances of
the event; the cost and manner of payment thereof, if known, and the payor
therefore. Such
statements shall be maintained by the Chairman and made available for public inspection.

2. No Commission member or employee shall attend any event, the invitation for which is extended because of his or her official position, unless he or she complies with the requirements set forth in the VI Casino and Resort Control Act of 1995.

3. A Commission member shall not solicit funds for any educational, religious, charitable, fraternal or civic organization, or use or permit the use of his or her office for that

purpose; be listed as an officer, director or trustee of such an organization in any letter or other document used in such solicitation; be a speaker or guest of honor at an organization's fundraising events, but may attend such events and contribute to such organizations; or give investment advice to such an organization or serve on its board of directors or trustees if it has the responsibility for approving investment decisions.

4. A Commission member or employee shall not permit the use of his or her official title for the purpose of fundraising for a private organization.

5. A Commission member may speak, write, lecture or participate in other activities concerning the casino industry, if in so doing the Commission member does not cast doubt on his or her ability to decide impartially any matter which may come before the Commission, and provided that the Commission member does not accept compensation or honoraria for any such activity.

6. A Commission employee shall not accept compensation for published works created as part of his or her official duties on Territorial Government time using Territorial Government resources.

7. A Commission member or employee may accept compensation for published works not created as part of his or her official duties provided that he or she complies with the VI Code.

8. A Commission employee may participate in any civic or charitable activities that do not interfere with his or her independence of judgment.

F. Gambling

Commission members and employees are prohibited from gambling in any establishment licensed by the Commission, except in the course of their official duties and with the prior written approval of the Commission.

G. Conduct

1. A Commission member or employee shall not:

(a) Knowingly act in any way that might reasonably be expected to create

an impression among the public that he or she may be engaged in conduct that violates his or her trust as a Commission member or employee;

(b) Use or attempt to use his or her official position to obtain unwarranted

privileges or advantages for himself or herself or others;

(c) Act in his or her official capacity in any matter in which the member or employee or any cohabitant or relative has a direct or indirect financial interest that might reasonably be expected to impair his or her objectivity or independence of judgment;

(d) Act in his or her official capacity in any matter concerning a licensee or applicant who is the employer of a cohabitant or relative when the fact of the employment might reasonably be expected to impair his or her objectivity and independence of judgment;

(e) Willfully disclose, directly or indirectly, without the prior authorization of the Commission, any confidential information concerning the affairs of the Commission not generally known or legally available to the public. Any direct or indirect willful disclosure of confidential information under circumstances other than those identified in the VI Casino and Resort Control Act of 1995 shall subject such person to the penalties set forth in the Act;

(f) Use or permit the use of any confidential information which he or she receives or to which he or she has access by virtue of his or her official duties, to advance his or her personal or financial interests or those of any other person;

(g) Directly or indirectly accept any gift, favor, service, employment, offer of employment or other thing of value under circumstances from which it might be reasonably inferred that such gift, service or other thing of value was given or offered for the purpose of influencing the member or employee in the discharge of his or her official duties.

(h) Solicit or accept, directly or indirectly, any complimentary service or

discount from any casino licensee or applicant which he or she knows or has reason to know is other than a service or discount that is offered to the general public in like circumstances;

(i) Make any reservation, arrange any meeting, or solicit or accept anything, service or favor for or on behalf of another party from any person subject to licensure or approval by the Commission except in the course of the performance of his or her duties and in accordance with the operational procedures governing such activity; or

(i) Stay overnight in a guest room at any casino hotel licensed by the Commission, except in the course of his or her official duties and with the prior approval of the Commission.

2. (a) It is the duty of each Commission member and employee to refrain at all times from any criminal conduct, and to cooperate with law enforcement officers in the proper performance of their official duties.

(b) It is the duty of each Commission member and employee who is charged with a crime or disorderly persons offense or with any motor vehicle violation that would adversely affect the performance of his or her duties, to report the charge to the Chairman.

3. It is the duty of each Commission member and employee to appear and testify upon matters directly related to the conduct of his or her office, position or employment before any State or federal court, grand jury, or any Territorial investigative body. after having been informed of his or her duty to appear and testify by the prosecuting attorney or an territorial investigations officer or attorney, shall be subject to removal from his or her office, position or employment.

4. A Commission member shall not testify as a character witness.

5. A Commission employee shall not testify as a character witness in any matter before the Commission.

6. Commission members shall not lend the prestige of their office to advance the private interests of others, nor convey or permit others to convey the impression that they are in a special position of influence.

7. Commission members shall uphold the integrity and independence of the Commission; shall perform the duties of their office impartially and diligently; and shall be patient, dignified and courteous to those individuals with whom they deal in their official capacity. They shall diligently discharge their administrative responsibilities.

They shall require members of the Commission staff to comply with this Code of Ethics. They shall not make unnecessary appointments, shall exercise the power of appointment only on the basis of merit, and shall allow only such compensation as is fair value for the services rendered.

H. Pending proceedings

1. A Commission member shall disqualify himself or herself in a proceeding in which his or her impartiality may reasonably be questioned, including but not limited to instances where he or she has a personal bias or prejudice concerning a party or personal knowledge of disputed evidentiary facts concerning the proceeding, or in other circumstances requiring disqualification of a judge pursuant to the provisions of the Code of Judicial Conduct.

2. A Commission member shall abstain from public comment about a pending proceeding, except in the course of his or her official duties or in explaining for public information the procedures of the Commission.

3. A Commission member shall neither initiate nor consider *ex parte* or other communications regarding a pending proceeding, except for consulting with their staff whose function it is to aid the Commission in carrying out its responsibilities.

4. A Commission member shall not meet with any person, except for any other Commission member or employee, or discuss with him or her any issues involving any pending or proposed application or any matter whatsoever which may reasonably be expected to come before the Commission or any member thereof for determination unless the meeting or discussion takes place on the business premises of the Commission. However, Commission members may meet to consider matters requiring the physical inspection of equipment or premises at the location of the equipment or premises. All meetings or discussions subject to this section of the Code shall be noted in a log maintained for this purpose and available for inspection, pursuant to the provisions of The VI Casino and Resort Control Act of 1995.

I. Disclosure

1. **Cohabitants and Relatives.** Each Commission member and employee shall disclose, in writing, the following information to the Commission upon commencement of membership or employment, within five days of the date when he or she becomes aware of any required information not previously reported, and annually no later than January 31 of each year during the course of appointment or employment:

(a) Any cohabitant or relative who holds or has filed an application for any license or registration issued by the Commission;

(b) Any cohabitant or relative who is employed by a casino licensee or applicant, or a holding company, intermediary company or subsidiary company;

(c) Any cohabitant or relative who is a qualifier of a licensed CSI; and

- (d) Any cohabitant or relative who holds a financial interest on a casino

licensee or applicant or any holding company, intermediary company or subsidiary company.

2. **Financial Disclosure.** Each Commission member and employee, except for secretarial and clerical employees, shall at the time of appointment or employment and annually thereafter during his or her appointment or employment, file a sworn financial disclosure statement with the Justice Department, Office of the Attorney General listing all of his or her assets and liabilities, property and business interests and sources of income, and those of his or her spouse.

3. The failure to file the above-required disclosures, or the filing of a willfully false disclosure, is grounds for termination of employment.

ARTICLE IV. POST-EMPLOYMENT RESTRICTIONS

A. Applicable regulations

Commission regulations regarding post-employment restrictions are set forth at VI Casino Control Regulations and are incorporated herein as if set forth in full.

B. Solicitation or acceptance of employment

1. Upon termination of his or her office or employment with the Commission, a Commission member or employee shall not solicit or accept employment with, or acquire any direct or indirect interest in, any casino licensee or applicant or holding company or intermediary company, or any other licensee, registrant or applicant, except for a nongaming CSI licensee or applicant, as follows:

- (a) For a former Commission member, for a period of two years following the termination of his or her office;
- (b) For a former Commission employee other than a secretarial or

clerical employee, for a period of two years following termination of employment; provided, however, that any person who held a position with the Commission that was defined as a policy-making management position at any time during the five years prior to termination of his or her employment, at the end of the two-year period and for two years thereafter, he or she shall not solicit or accept employment with any licensee, registrant or applicant, except with the prior approval of the Commission upon a finding that the employment will not create a real or apparent conflict of interest;

(c) Notwithstanding (b) above, if a Commission employee is terminated as the result of a reduction in workforce, he or she may at any time accept employment with a licensee, registrant or applicant with the prior approval of the Commission upon a finding that the employment will not create a real or apparent conflict of interest. This provision does not apply to any person who held a position with the Commission that was defined as a policy-making management position at any time during the five years prior to termination of his or her employment.

(d) Secretarial and clerical employees are not subject to any post-employment restriction.

C. Representation

1. For a period of two years following the termination of his or her office or employment with the Commission, a former Commission member or employee shall not:

(a) Represent, appear for or negotiate on behalf of, any casino licensee or applicant or any holding company or intermediary company; or

(b) Represent any person or party other than the State before or against the Commission.

2. No former Commission member or employee shall represent, appear for, negotiate on behalf of, provide information not generally available to members of the public or services to, or agree to do so, whether directly or through any partnership, firm or corporation in which he or she has an interest, or through any partner, officer or employee thereof, any person or party other than the State in connection with any cause, proceeding, application or other matter with respect to which he or she has made any investigation, rendered any ruling, given any opinion or been otherwise substantially and directly involved in at any time during the course of his or her office or employment.

D. Interests

No former Commission member or employee, other than a secretarial or clerical employee, shall acquire any direct or indirect interest in any casino licensee or applicant or any holding company or intermediary company, as follows:

(a) For a former Commission member, for a period of two years following the termination of his or her office;

(b) For a former Commission employee other than a secretarial or clerical employee, for a period of two years following termination of employment; provided, however, that any person who held a position with the Commission that was defined as a policy-making management position at any time during the five years prior to termination of his or her employment, at the end of the two-year period in (b) above and for two years thereafter, he or she shall not acquire any interest in any licensee, registrant or applicant, except with the prior approval of the Commission upon a finding that the interest will not create a real or apparent conflict of interest.

ARTICLE V. RESTRICTIONS APPLICABLE TO COHABITANTS AND RELATIVES

A. Employment

1. No spouse, parent, child or sibling of a Commission member shall be employed in any capacity by a casino licensee or applicant or any holding company, intermediary company or subsidiary.

2. No Commission member or employee shall cohabit with any person who is an employee of a casino licensee or applicant or any holding, intermediary or subsidiary company, except that a Commission employee may cohabit with such person upon obtaining a prior waiver of this prohibition from the Commission. If such cohabitant is or later becomes a member of the immediate family of a Commission employee, the Conflicts Law requires that the employee obtain a second waiver from the State Ethics Commission. Violation of this provision is grounds for termination of employment.

(a) A Commission employee may request such a waiver from the Commission by submitting a written request to the Commission Chairman, setting forth all the relevant facts, including:

1. The relationship between the employee and the prospective cohabitant;
11. The employer, employment location and job title and responsibilities of the prospective cohabitant;
- m. The anticipated duration of the cohabitation; andiv. If applicable, the Commission employee must also certify that the prospective cohabitant is not a member of his or her immediate family.

(b) The Commission may grant, with or without special conditions, or

deny the application after considering the following, without limitation:

1. The impact of the cohabitation on the effective discharge of the employee's duties, including the ability of the Commission to insulate the Commission employee from any functions related to the regulation of the cohabitant's employer; and

11. The impact of the cohabitation on the reasonable public expectation of the Commission employee's independence and lack of personal interest.

- (c) If the prospective cohabitant is a member of the immediate family of a Commission employee the Commission will make a determination in accordance with law.

B. Interests

No member of the immediate family of a Commission member or employee shall hold any direct or indirect interest in any licensee, registrant or applicant.

C. Representation

No member of the immediate family of a Commission member or employee shall represent, appear for or negotiate on behalf of, any casino licensee or applicant or any holding company or intermediary company.

D. Gambling

The spouse of a Commission member or employee is prohibited from gambling in any establishment licensed by the Commission.

E. Post-employment restrictions

1. No member of the immediate family of a former Commission member or employee shall, for a period of two years following the termination of the office or employment with the Commission, accept employment with any casino licensee or applicant or any holding company or intermediary company, except that such person may hold

employment with a casino licensee or applicant if the Commission determines that such employment will not interfere with the responsibilities of such person and will not create a conflict of interest or a reasonable risk of the public perception of a conflict of interest.

2. No member of the immediate family of a former Commission member or employee shall, for a period of two years following the termination of the office or employment with the Commission, acquire any direct or indirect interest in, or represent, appear for or negotiate on behalf of, any casino licensee or applicant or any holding company or intermediary company.

ARTICLE VI. RESTRICTIONS APPLICABLE TO PARTNERSHIPS, FIRMS AND CORPORATIONS

A. Employment, representation and interests

1. No partnership, firm or corporation with which a Commission member or employee is associated or in which he or she has an interest, and no partner, officer, director or employee thereof, shall:

(a) Hold employment with, or represent, appear for or negotiate on behalf of any casino licensee or applicant or any holding company or intermediary company.

(b) Hold any direct or indirect interest, as defined by law, in any casino licensee or applicant or any holding company or intermediary company. (c) 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 the State in connection with any cause, proceeding, application or other matter pending before any State agency, except as otherwise provided in the VI Casino and Resort Control Act of 1995.

B. Post-employment restrictions

1. No partnership, firm or corporation with which a former Commission member or employee has an interest, and no any partner, officer, director or employee thereof, shall make any appearance or representation that is prohibited to the former member or employee, other than on behalf of a nongaming-related CSL

2. No partnership, firm or corporation with which a former Commission member or employee has an interest, and no any partner, officer, director or employee thereof, shall, for a period of two years following the termination of the office or employment with the Commission, acquire any direct or indirect interest in, or represent, appear for or negotiate on behalf of, any casino licensee or applicant or any holding company or intermediary company. For purposes of this restriction, "interest" is defined by law.

ARTICLE VII. CONSULTANTS A. Conflicts Law

A consultant shall be deemed to be a "special territorial employee without responsibility for matters affecting casino activity" for purposes of applying the provisions of the VI Conflicts of Interest Law, except as otherwise provided herein.

B. Applicable Restrictions

1. No consultant, nor any corporation, firm or partnership in which he has an interest or by which he is employed, shall represent any person or party other than the Commission or the Division before the Commission.

2. The provisions of this Code of Ethics shall not apply to a consultant, except as follows:

- (a) The general provisions of Article I;
- (b) The prohibition against gambling in Article III, paragraph F and Article V, paragraph D;

- (c) The guidelines for conduct in Article III, paragraph G. 1 (a)-(g);
- and(d) The disclosure requirements of Article III, paragraph I. 1.

3. In order to avoid the appearance of a violation of the public trust, no consultant who provides services directly related to the implementation of the Act or Commission regulations shall simultaneously enter any contract for services with the Commission and any of the following:

- (a) A casino licensee or applicant;
- (b) A holding company or intermediary company;

or

- (c) Any gaming-related CSI licensee or applicant.

4. No consultant, nor any member of his or her immediate family, nor any partnership, firm or corporation with which he or she is associated or with which he or she has an interest, shall acquire any direct or indirect interest in a licensee, registrant or applicant, or any holding company or intermediary company, during the course of his or her contract for services with the Commission.