Oregon Government Ethics Commission

Commission Meeting Materials

November 13, 2026

OREGON GOVERNMENT ETHICS COMMISSION

Meeting Minutes

October 9, 2026

9:00 a.m.

Commissioners Jonathan Thompson and Larry Givens were present in person. Commission Chair Shenoa Payne, Commissioners Alicia McAuley, Peter Janci, Metler, Iván Resendiz Gutierrez, Richard Burke, and Cheri Helt were present via Teams. Commissioner Ann Metler was excused.

Executive Director Susan Myers, Compliance & Enforcement Coordinator Casey Fenstermaker, Curriculum & Training Coordinator Stephanie Heffner, Senior Operations Mgr. Becky Maison, Trainer Angela Nolan, and Investigators Josh Sullivan, Sheetal Digari, Silas Patterson, and Daniel Pacheco were present in person. Trainer Lex Tingey and Admin Staff Amber Heitz and Jessica Foster were present via Teams.

Department of Justice (DOJ) Counsel Sean Brady was present in person.

Members of the Press, present via Teams: Dianne Lugo, Anastasia Mason, and Katelyn Livermoore, Statesman Journal; Alex Baumhardt, Oregon Capital Chronicle; and Yesenia Amaro, Oregonian

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(File 1)

Chair Payne called the meeting to order at 9:02 a.m. Roll call was completed by Chair Payne to confirm attendance of the Commissioners.

Public Session Item 1, Comments from the Chair. None.

These minutes contain materials which paraphrase and/or summarize statements made during this meeting. Only text enclosed in quotation marks report a speaker's exact words. For complete contents of the proceedings, please refer to the recordings at https://www.oregon.gov/ogec/about-us/Pages/Meetings.aspx

Public Session Item 2, Comments from the Commissioners. None.

Public Session Item 3, Approval of Minutes.
Commissioner Thompson moved the Commission approve the minutes for the September 11, 2026 meeting. Roll call was taken as follows: Thompson, aye, Resendez Gutierrez, abstain; Burke, aye; Janci, abstain; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 5-0, 2 abstentions.

Helt joined the meeting immediately following the vote due to technical difficulties.

Chair Payne read the executive session script authorizing the executive sessions.

To consider information or records that are exempt by law from public inspection as authorized under ORS 192.660(2)(f), and

To consider Preliminary Reviews pursuant to the following authorities:

- ORS 192.660(2)(f) to consider information or records that are exempt by law from public inspection;
- ORS 244.260(4)(c) and (d), requiring Preliminary Reviews to be kept confidential and requiring the Commission to consider Preliminary Reviews in executive session; and
- ORS 192.685(1), requiring public meetings law complaints to be considered as provided in ORS 244.260, which includes the confidentiality and executive session requirements of ORS 244.260(4)(c) and (d).

Resendiz Gutierrez declared potential conflict of interest for executive session agenda items 12-17 as his firm representatives the public body but not the

individual representatives. He does not have a statutory conflict and will participate and vote.

Helt stated that she sits on the Oregon Lodging and Restaurant Board and has an interest in executive session agenda item # 8, but does not have any statutory conflicts of interest, so will participate and vote and just wanted to make a disclosure.

EXECUTIVE SESSION

The Commission convened into Executive Session at 9:12 a.m.

(File 2)

Executive Session Consent Calendar

Executive Session Item 1, Steve Elder – 26-639PCF – Garibaldi Rural Fire Protection District

Commissioner Thompson moved the Commission approve the Executive Session Consent Calendar as presented. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Reports of Preliminary Review

Facilitated by Investigators

Executive Session Item 3, Loretta Smith – 26-489ESP – City of Portland

Presenter: Silas Patterson

Respondent was not present. Investigator Patterson summarized the case and the recommendation to dismiss. Patterson advised that Smith purchased tickets to a Portland Metro Chamber meeting and the tickets were discounted. Patterson explained that the discounted tickets were analyzed two different ways, and each

way, he was able to determine the discounted tickets did not meet the definition of a gift and Smith was representing the City of Portland at the meeting. Patterson advised that it appears that Smith did not violate ORS 244. Commissioner Thompson moved the Commission to dismiss the complaint against Loretta Smith. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 4, Rodney Dieckhoff – 26-500EDP – Four Rivers Vector Control District
Executive Session Item 5, Lawrie Dieckhoff – 26-501EDP – Four Rivers Vector Control District
Presenter: Daniel Pacheco
Respondents Rodney and Lawrie Dieckhoff were not present. Investigator Daniel Pacheco summarized the recommendations. Pacheco advised that it appears that the Dieckhoffs may have violated ORS 244 at various district meetings when faced with a conflict of interest, may have attempted to use their position for financial gain for a relative, and may have violated nepotism provisions with regards to their relative.

Payne inquired about reviewing the minutes from the June meeting, why the district minutes were not reviewed, and why would staff want to review the minutes. Pacheco advised that he did not have enough time to review the minutes but would look for any possible conflicts of interest that may have come up within the minutes and discussion.

Executive Session Item 4, Rodney Dieckhoff – 26-500EDP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Rodney Dieckhoff may have violated ORS

244.040, ORS 244.120(2), and ORS 244.179 and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 5, Lawrie Dieckhoff – 26-501EDP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Lawrie Dieckhoff may have violated ORS 244.040, ORS 244.120(2), and ORS 244.179 and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 2, Claudine Walker – 26-488EJS – Deschutes County
Presenter: Josh Sullivan

Respondent was present via the telephone. Investigator Sullivan summarized the case and the recommendation. Sullivan stated that a Deschutes County report highlights that Walker used Deschutes County to financially benefit her private practice, used county resources for her private practice and did private work on County time. She did not properly notify and disclose her conflicts of interest each time she was faced with a conflict of interest.

Walker addressed the Commission and stated that she made some poor decisions that she is not proud of. She does not believe the 35%-time estimate is accurate that the Deschutes County report states. She stated that private practice activities took place in the early morning, on lunch and after work hours, did not occur daily, and did not displace County clients. She stated she lost her job with the county, was denied unemployment, and is now under investigation for her license. She is grieving the loss of her husband and mother and would

like the Commission to consider all her losses in this matter. She deeply regrets the judgement she made, accepts responsibility for what actually occurred, and respectfully asked the Commission to distinguish that conduct.

Thompson stated that there are some questions that need to be answered and the investigation should move forward.

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Claudine Walker may have violated ORS 244.040(1) and ORS 244.120(1)(c) and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 6, removed from the agenda

Executive Session Item 7, Derrick DeGroot – 26-515SCF – Klamath County
Presenter: Sheetal Digari

Respondent Derrick DeGroot was present via Teams. Investigator Sheetal Digari summarized the case and the recommendation to move to investigation. Digari advised that DeGroot failed to report his county salary and properties, such as DNS Properties, on his Statement of Economic Interest form.

Helt asked if DeGroot failed to report his Veteran's benefits and that was the issue. Fenstermaker explained that his Veteran's benefits were reported correctly but it was his County Commissioner salary that was not reported.

DeGroot addressed the Commission. He stated that he did have errors on his filings where he failed to report his County Commission salary and said it was operator error and had some small technical fixes such as explaining things as his wife's, etc. He stated that he has amended his reports. He stated that the Secretary of State DNS Properties does list his name. He stated that he is only listed there to assist his father. He stated that the way he is listed on the Secretary of State site is probably wrong and should be updated, but not his Statement of Economic Interest.

Helt asked if there was a cure for Statement of Economic Interest Filings as they are so confusing.

Myers explained that updating his Statement of Economic Interest is a cure of sorts and that as a practice have moved cases such as DeGroot's move to investigation and issue a Letter of Education to create a record, to acknowledge that he did cure during the course of the matter.

Payne agreed that since she has been on the Commission that has been the standard practice with Statement of Economic Interest filing issues.

Thompson stated that it appears that he is the second County Commissioner to appear that has not listed their county salary and that perhaps the Association of Oregon Counties should remind County Commissioners to include their County salary on their Statements of Economic Interest.

Myers stated that OGEC staff have been working on updating the SEI Filers' Guide, website, and form to help provide additional clarity.

Helt stated that she agrees with Thompson and that she is struggling because she feels that it is disclosed that he is a County Commissioner and the public should be aware of that. She stated that it is a silly ironic mistake and agrees the forms should be made more clear on what to disclose.

Payne stated that she feels that it should move to investigation so that a Letter of Education can be issued.

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Derrick DeGroot may have violated ORS 244.060(3) and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, nay; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 7-1.

Executive Session Item 8, Steven Weight – 26-517ESP – City of Cannon Beach
Presenter: Silas Patterson
Respondent Steven Weight was present in person. Investigator Patterson summarized the case and recommendation to move to investigate. Patterson stated that Weight may have failed to declare a conflict of interest and voted against a cap that would financially impact his businesses and short-term rentals. Patterson stated that if it moved to investigation, he would look at how this issue arose, who drafted the motion, and who put it on the agenda.

Thompson asked Patterson to confirm the income listed on Weight's Statement of Economic Interest. Patterson confirmed it was Sunset to Sunset Vacation rentals and a gift card.

Helt stated that the report mentions Sunset to Sunset Vacation rentals and the possibility of expansion. She asked if anyone contacted Sunset Rentals. Helt stated that it is a jump to assume a company would want to expand.
Myers stated that if Cannon Beach limited short term rentals, then renters and landlords would have to look elsewhere for rentals, such as Manzanita which would potentially have a financially impact.

Helt stated that he voted against the cap. Myers stated even if one votes against their financial benefit, one still has the obligation to state a potential conflict of interest, which this would be a potential conflict of interest.

Weight addressed the Commission and stated that the gift card was presented to him two years ago by a neighbor because he assisted with a contractor and water heater. He stated he wasn't paid; he was given a gift card. He stated that Cannon Beach has two types of short-term rentals: one without limits rentals and one that limits 14-day rentals. He stated they were voting on a 165 cap between a 14-day rental and unlimited rental. He stated the cap didn't have an impact, unless it was a total cap which would be a 30 rental reduction.

Payne stated the report listed him as a local representative for short-term rentals. Weight explained that the local representative is like an emergency contact and he is one for his neighbor. He stated that he travels with his friends and they are also local representatives. He delivers toilet paper and has items shipped to him on behalf of the rentals. He says he is not paid except for when they give him things like the gift card.

Givens asked if he was still on the Planning Commission and if he was running for City Council. Weight stated yes, and yes. Givens asked if he was familiar with Andrew Tonry. Weight said yes, he is a good friend with his opponent.

Weight stated that Manzanita is 15 miles away and does not have any MOUs (memoranda of understanding) with them.

Helt asked that when he voted against the cap, did he feel it was a benefit or detriment of the short-term rentals? Weight stated that he wanted something more restrictive. Weight stated that voting to restrict the 14-day cap would not benefit or change anything.

Thompson stated that he appreciated the discussion and candor. He stated he does not see anything and is inclined to dismiss.

Janci asked if the case was moved to investigation, what would OGEC look at. Patterson stated that he would look at a 244.040 violation as there was already a failure to declare a conflict of interest, so he would look at who made the motion.

Burke stated that he would make a motion to dismiss.

Payne stated that it does not matter if someone votes against their own financial benefit, if they are faced with a vote that could or would financially impact them, they do need to declare a conflict of interest. In this case, she stated she does not see a potential or actual conflict of interest.

Myers stated that she would add that should the matter be dismissed, it would still be beneficial for a letter of advice to be issued regarding conflicts of interest and gift clauses and honorarium.

Commissioner Burke moved the Commission dismiss the complaint against Steven Weight. Roll call was taken as follows: Thompson, aye; Resendez

Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

The Commission recessed for a break from 10:26 a.m. - 10:33 a.m.

Executive Session Item 9, John Ward – 26-524EDP – Curry County
Presenter: Daniel Pacheco
Respondent John Ward and Attorney Erin Ward were present via Teams. Investigator Pacheco summarized the case and the recommendation to dismiss. The complaint alleged Ward accepted property from a non-profit organization (Adkins Foundation) and purchased ammunition and firearms from the Sheriff's Office. It appears that Ward permits the Sheriff's Office to use the travel trailer and storage. It appears that Ward did not purchase firearms or ammunition from the Sheriff's Office during his term.

Helt asked Pacheco about the taxes regarding the gift. The gift may be out of OGEC's jurisdictional time frame, but the taxes may be within OGEC's jurisdiction. Myers stated they opened the case so that they could look at the taxes and to explore if there was a violation there. It appears that the taxes were being paid by Ward, not anyone else. It appears that he is donating the money paid for the taxes as he is stating the property belongs to the Sheriff's Office.

Givens asked if the property is listed under his name or the Sheriff's Office. Pacheco stated that the property is under Ward's name. Givens asked if there was a time limit. Myers confirmed 4 years is the statutory limitation.

Gould addressed the Commission and expressed her appreciation for the report and felt the complaint was trying to discredit Ward and the Sheriff's Office.

Helt asked how they should view the taxes being paid when the property is under his name. Gould stated that Ward is donating by paying the property taxes. She stated that he is losing money by having these items on his property.

Commissioner Thompson moved the Commission dismiss the complaint against John Ward. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 10, Kelley Minty – 26-536SSD – Klamath County
Presenter: Sheetal Digari
The Respondent was not present. Investigator Digari addressed the Commission and summarized the complaint. The complaint alleged that Minty did not list two positions held by Minty on her Statement of Economic Interest. Digari stated that Minty failed to list property on her Statement of Economic Interest. Digari stated that the positions held did not need to be listed. Digari stated Minty updated her Statement of Economic Interest form during the process.

Givens asked to confirm that she did not have an interest in the two companies. Digari confirmed.

Helt asked if the form was updated. Digari confirmed.

Payne stated that the report notes that the complainant asked to withdraw part of the complaint and why the staff continued to move forward with the full complaint. Myers stated that staff do not have the ability to dismiss a complaint, so they did need to verify the information. Payne stated that it feels like it might be a waste of staff resources when a part of a complaint is withdrawn.

Givens stated that the Commission has the authority to dismiss a complaint. Payne stated there is no recommendation to move forward with the part of the complaint that was withdrawn as the staff verified that it was not valid, but there is a recommendation to move forward with the Statement of Economic Interest violation.

Payne advised that the Commission consistently moves forward with Statement of Economic Interest violations and issues a Letter of Education with first time violations.

Helt stated that she is going to vote against moving forward as she feels that it is a waste of staff time and the issue is cured.

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Kelley Minty may have violated ORS 244.060(4) and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, nay; Givens, nay; McAuley, aye; Payne, aye. Motion passed. 6-2.

Executive Session Item 11, Lamar Wise – 26-534SDP – Oregon State Legislature
Presenter: Daniel Pacheco
The Respondent was not present. Investigator Pacheco summarized the case and the recommendation to move to investigation. The complaint alleged that Wise did not report a source of income. Pacheco advised that the source of income was less than 10%, so was not needed to be reported but did have a legislative interest in his role as a public official so would need to be listed on his report in another section and Wise did not list the lobbyists associated with that business on question 7.

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Lamar Wise may have violated ORS 244.060(8) and ORS 244.090(1) and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Lane Community College

Presenter: Josh Sullivan
Executive Session Item 12, Kevin Alltucker – 26-439XJS
Executive Session Item 13, Jerry Rust – 26-456XJS
Executive Session Item 14, Zachary Mulholland – 26-457XJS
Executive Session Item 15, Julie Weismann – 26-458XJS
Executive Session Item 16, Steve Mital – 26-460XJS
Executive Session Item 17, Jesse Maldonado – 26-461XJS
Respondent Kevin Alltucker and Rust appeared by telephone. Respondents Mulholland, Weismann, and Mital were not present. Investigator Sullivan summarized the cases. Sullivan advised that it appears that the Board may have failed to provide the subject of the executive session with a notice containing information about how to request an open hearing. It also appears that the Board may have failed to cite the appropriate executive session provisions authorizing the June 3 executive session in their notice.

Rust addressed the Commission and stated that he was present when Austin objected to the executive session they entered in June. He stated that Austin gave him the gavel. He stated that he immediately asked counsel if they were okay and was advised by counsel that they were okay and could go forward. He

stated that they could use more education about Public Meetings Law, especially regarding noticing.

Alltucker addressed the Commission and stated that he was surprised that Rust was on the call at the same time. Myers explained that all Public Meetings Law cases are at default consolidated unless requested otherwise. Alltucker stated that he would like to be heard separately. Myers explained that he would need to disconnect and call back again to be in the waiting room until the Commission is done hearing the rest of the cases.

Alltucker left the meeting temporarily.

Payne asked Rust about the discussions following the end of the executive session. Rust stated that he could not remember at this time. Payne redirected the question to Sullivan. Payne asked if there were any discussions after the executive session. Sullivan stated that once the executive session started, Fölnagy left, and then the discussion continued. Payne asked to confirm that they stopped all discussions except logistics, such as noticing. Sullivan stated no, they continued to have discussions in executive session such as confidential matters with their legal counsel.

Rust left the meeting temporarily.

Alltucker rejoined the meeting and addressed the Commission. He stated that he was reading his statement on his behalf and on behalf of Weismann and Mital. He stated that in May, they received a notice about an executive session for June 3. He stated that he was not aware of Fölnagy’s concerns. He stated that at the meeting, Fölnagy raised his concerns and read a statement and the counsel offered to reschedule the meeting but Fölnagy refused. Alltucker stated he was

frustrated because Fölnagy had 5 days to raise his concerns about the meeting notice but waited until the actual meeting to address them, and then he refused to work with the counsel at the meeting. The board was under scrutiny at the time and Alltucker relied on the counsel's guidance. He was concerned about Fölnagy's characterization of events that he did not witness.

Thompson stated there are a lot of questions and differing accounts and he would recommend moving forward so staff can answer those questions.

Executive Session Item 12, Kevin Alltucker – 26-439XJS
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Kevin Alltucker may have violated ORS 192.640(1), ORS 192.660(2), OAR 199-040-0030, and OAR 199-050-0040 and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Alltucker left the meeting.

Executive Session Item 14, Zachary Mulholland – 26-457XJS
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Zachary Mulholland may have violated ORS 192.640(1), ORS 192.660(2), OAR 199-040-0030, and OAR 199-050-0040 and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 15, Julie Weismann – 26-458XJS

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Julie Weismann may have violated ORS 192.640(1), ORS 192.660(2), OAR 199-040-0030, and OAR 199-050-0040 and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 16, Steve Mital – 26-460XJS

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Steve Mital may have violated ORS 244.060(8) and ORS 244.090(1) and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 17, Jesse Maldonado – 26-461XJS

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Jesse Maldonado may have violated ORS 244.060(8) and ORS 244.090(1) and that the Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Rust rejoined the meeting.

Executive Session Item 13, Jerry Rust – 26-456XJS

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Jerry Rust may have violated ORS 192.640(1), ORS 192.660(2), OAR 199-040-0030, and OAR 199-050-0040 and that the

Commission should investigate accordingly. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Lane Community College

Presenter: Josh Sullivan

Executive Session Item 18, Austin Fölnagy – 26-459XJS

Respondent Austin Fölnagy was present via Teams. Investigator Sullivan summarized the case and recommendation to dismiss as Fölnagy left the meeting on June 3 after announcing that it was improperly noticed.

Fölnagy addressed the Commission and stated that the board needs to learn. He stated that they have already completed a Public Meetings Law training. He stated that he feels that there were more violations than reported but he left. He wants to emphasize his duty to the public. He stated it was completely avoidable. He stated that he experiences bullying from his colleagues and was told that he does not understand the law. He stated that he has experienced micro aggressions from his colleagues after making this report.

Executive Session Items 18, 26-459SJX

Commissioner Thompson moved the Commission dismiss the cases against Austin Fölnagy. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

Executive Session Item 19, Michael Olson- 26-462XJS

Respondent was not present. Investigator Sullvan summarized the recommendation to dismiss as Olson was not present at the June 3 meeting.

Executive Session Items 19, 26-462XJS

Commissioner Thompson moved the Commission dismiss the cases against Michael Olson. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

City of Rufus

Presenter: Silas Patterson

Executive Session Item 23, Daniel Ruise – 26-483XSP

Respondent Daniel Ruise was present via Teams. Investigator Patterson summarized the case and the recommendation to investigate. The complaint alleged the City Council held an improperly noticed executive session and discussed topics that were not noticed. It appears that the City Council did talk about topics not covered by the notice and improperly noticed the meeting and failed to meet the noticing requirements. Patterson stated that he would look into Ruise to see if he would be considered a public officer by statutory definition which may lead to another possible violation.

Payne asked if once the Executive Session was convened, were there any other discussions or just conversations about rescheduling the meeting? Patterson stated Ruise noted that he felt the meeting was improperly conducted and left the meeting.

Helt asked what else was discussed besides scheduling. Patterson answered that there was discussion of the citation and statutory authority.

Given asked if Ruise was present for the executive session. Patterson stated that the executive session started and he was present while it was convened and then he left at the beginning. He stated that it is ultimately the Commission's call

to dismiss, since he was there at convening of the meeting, but he did leave. Thompson asked why there is not a recommendation to dismiss since he left the meeting after he realized that it was off the rails? Patterson stated that since he was still there at the time the meeting was convened, it was recommended for investigation.

Ruise addressed the Commission and stated he takes Public Meetings Law seriously. He stated the concerns discussed in this matter are the same concerns that led to him filing the grievance. He stated that he took steps to bring forward the notice for review.

Helt stated that she felt the case against Ruise should be dismissed. Givens stated that he agreed with Helt. Payne stated that she agreed with the sentiments.

Executive Session Item 23, Daniel Ruise – 26-483XSP
Commissioner Thompson moved the Commission dismiss the complaint against Daniel Ruise. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

City of Rufus

Presenter: Silas Patterson
Executive Session Item 20, Austin Evans – 26-452XSP
Executive Session Item 21, Daniel Funkhouser – 26-481XSP
Executive Session Item 22, Wendy Boyer – 26-482XSP
Executive Session Item 24, Fred Fahrni – 26-484XSP
Respondent Austin Evans and Fred Fahrni were present via telephone. Respondent Daniel Funkhouser was present in-person. Investigator Patterson

summarized the case and the recommendation to investigate. The complaint alleged the City Council held an improperly noticed executive session and discussed topics that were not noticed. It appears that the City Council did talk about topics not covered by the notice, improperly noticed the meeting, and failed to meet the noticing requirements. Patterson stated that he would look into Ruise to see if he would be considered a public officer by statutory definition which may lead to another possible violation.

Respondent Evans addressed the Commission and stated that their positions are volunteer. Boyer had requested an executive session back in April to discuss several staff members and a Counciler. He stated that he encouraged the council to attend an OGEC Public Meetings Law training and he attended one himself.

Respondent Funkhouser addressed the Commission and stated that he wanted to be in-person as it feels more personable that way. He stated that he used to be a volunteer firefighter and was a firefighter. He is very proud of the school that was built in Rufus. He enjoys public service. He stated that he did not prepare, post, or select the notice.

Respondent Fahrni addressed the Commission, he stated that he agrees with both Evans and Funkhouser. He stated he feels that there is someone in the mix that wants to be in control of everything. He says that their secretary makes mistakes all the time. He says it is junk and garbage, and this meeting shouldn’t be happening. He says he has a bad taste in his mouth about being involved in local government because of this situation.

Thompson said that he was on the fence as there was a mistake, but when it was raised, they stopped it and made a plan to fix it. He stated he wanted to hear what everyone else had to say.

Givens stated that his feeling was that it should be dismissed.

Payne stated that she agrees with the Vice Chair as the spirit was complied with. Helt stated she agrees with what has been said by all the other Commissioners, the scheduling doesn't qualify as a serial meeting and this was very much a technicality. They did the right thing by stopping the meeting and it was basically a typo. Helt stated that it was weighing heavily on her that a statement was made regarding this matter as being a deterrent to public service. She recommends a dismissal. Commissioner Janci also supports dismissal.

Executive Session Item 20, 21, 22, 24, Austin Evans, Daniel Funkhouser, Wendy Boyer, Fred Fahrni – 26-452XSP, 26-481XSP, 26-482XSP, 26-484XSP
Commissioner Thompson moved the Commission dismiss cases 26-452XSP, 26-481XSP, 26-482XSP and 26-484XSP against Austin Evans, Daniel Funkhouser, Wendy Boyer, and Fred Fahrni. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 8-0.

The Commission recessed for a break from 12:21 p.m. – 12:45 p.m.

(FILE 3)
Payne re-read Executive Session Citation for Legal Advice as a reminder for the media.

(FILE 4)
Other Items

Executive Session Item 25, Consider information or records exempt from public

inspection (confidential attorney-client privileged legal advice), pursuant to ORS 192.660(2)(f)

Department of Justice Counsel Sean Brady summarized the legal memorandum that was sent to the Commissioners. The Commissioners asked questions regarding the memorandum and Brady responded accordingly.

Own Motion Preliminary Reviews – None

Reconvene Regular Open Session

(FILE 5)

The Commission adjourned the Executive Session at 1:15 p.m.

Commissioner Janci left the meeting at 1:15 p.m.

Filing Penalty Waivers – Consent Calendar

Lobbyist Penalty Waivers

Public Session Item 4, Serenas Campas – Rewiring America, Inc.

Lobbyist Client Penalty Waivers

Public Session Item 5, Samuel Breyer – Oregon Association of Education Service Districts

Statement of Economic Interest Penalty Waivers - None

Commissioner Thompson moved the Commission approve the filing penalty waivers as presented on the Consent Calendar (Items #4 - #5). Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 7-0.

Filing Penalty Reductions

Lobbyist Penalty Reductions - None

Lobbyist Client Penalty Reductions - None

Statement of Economic Interest Penalty Reductions - None

Stipulated Final Orders – Consent Calendar

The following Stipulated Final Orders have been placed on a consent calendar to receive a letter of education in place of a monetary penalty.

Public Session Item 6, Bob Wolverton - 25-531PCF – Ochoco West Water and Sanitation Authority (OWWSA)

Public Session Item 7, James Dunkin - 25-694PCF – OWWSA

Public Session Item 8, Ross Scrocca - 25-695PCF – OWWSA

Public Session Item 9, Mary Scrocca - 25-696PCF – OWWSA

Public Session Item 10, Tammy Dennee - 26-453LJS - Lobbyist

Commissioner Thompson moved the Commission approve the proposed Stipulated Final Orders presented on the Consent Calendar as the final orders in those cases and the chairperson be authorized to sign them as such. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, aye; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 7-0.

Columbia 911 Communications District

Compliance & Enforcement Coordinator Fenstermaker summarized the cases and the recommended Stipulated Final Orders. Fenstermaker defined conflicts of interest. She advised that these public officials were approving expenditure reports, check register, or check that included expenditures for themselves. These public officials were faced with conflicts of interest each time they were approving their expenditures.

Resendez Gutierrez declared a potential conflict of interest and stated he would be abstaining as his firm represents Columbia 911, but he does not.

Reports of Investigations

Columbia 911 Communications District

Presenter: Silas Patterson & Josh Sullivan

Public Session Item 10e, Henry Heimuller – 26-072EJS

Sullivan summarized the report for Heimuller as Heimuller voted to approve a motion that included an expenditure report for expenses for Heimuller's conference. Sullivan was able to determine that there was no direct financial benefit for Heimuller.

Commissioner Thompson moved the Commission dismiss the complaint against Henry Heimuller. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, abstain; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 6-0, 1 abstention.

Public Session Item 10f, Mike Fletcher – 26-077ESP

Patterson summarized the report for Fletcher he voted to approve a motion that included an expenditure report for expenses for Fletcher's conference. Sullivan was able to determine that there was no direct financial benefit for Fletcher.

Commissioner Thompson moved the Commission dismiss the complaint against Mike Fletcher. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, abstain; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 6-0, 1 abstention.

Public Session Item 10g, Jeff Flatt – 26-074ESP

Patterson summarized the case and the recommendation to find preliminary violation of ORS 244.120(2)(b) as it appears he voted to approve a travel

expense per diem check that was issued to himself.

Commissioner Thompson moved the Commission find there is sufficient evidence that Jeff Flatt has violated ORS 244.120(2)(b) and that the Commission adopt the Investigation Report as its preliminary findings and order this case moved to a contested case proceeding or a negotiated settlement entered. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, abstain; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 6-0, 1 abstention.

Stipulated Final Orders

Public Session Item 10a, Jeremy Hipes - 26-071EJS
Public Session Item 10b, Rob Anderson - 26-076ESP
Public Session Item 10c, Bruce Holsey - 26-075ESP
Public Session Item 10d, Shelley Hennessy - 26-073EJS
Sullivan summarized the Stipulated Final Orders and the checks that they received for themselves.

Public Session Item 10a, Jeremy Hipes - 26-071EJS
Commissioner Thompson moved the Commission approve the proposed Stipulated Final Order as the final order in this case and the chairperson be authorized to sign it as such. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, abstain; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 6-0, 1 abstention.

Public Session Item 10b, Rob Anderson - 26-076ESP
Commissioner Thompson moved the Commission approve the proposed Stipulated Final Order as the final order in this case and the chairperson be authorized to sign it as such. Roll call was taken as follows: Thompson, aye;

Resendez Gutierrez, abstain; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 6-0, 1 abstention.

Public Session Item 10c, Bruce Holsey - 26-075ESP
Commissioner Thompson moved the Commission approve the proposed Stipulated Final Order as the final order in this case and the chairperson be authorized to sign it as such. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, abstain; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 6-0, 1 abstention.

Public Session Item 10d, Shelley Hennessy - 26-073EJS
Commissioner Thompson moved the Commission approve the proposed Stipulated Final Order as the final order in this case and the chairperson be authorized to sign it as such. Roll call was taken as follows: Thompson, aye; Resendez Gutierrez, abstain; Burke, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 6-0, 1 abstention.

Default Final Orders - None.

Commission Advisory Opinions – None.

Correspondence Received/Responses

No Action – For Review Only

Staff Advisory Opinions - None.

Staff Advice – Informational Letters
Public Session Item 11, Jin Lan – 26-608I – Oregon-China Sister State Committee Public Session Item 12, Kimberly Stuart – 26-623I – Washington Co.

Sheriff's Office

Public Session Item 13, Kevin Barton – 26-590I – Washington Co. District Attorney

Public Session Item 14, Rep. Jami Cate – 26-637I – Oregon Legislative Assembly

Public Session Item 15, Travis Meuwissen – 26-644I – Hospital Association of Oregon

Public Meetings Law Training Approval Letters - None

Other Correspondence

Public Session Item 16, Correspondence with Heather Van Meter

No action taken.

Miscellaneous Items

Facilitated by Staff

Public Session Item 17, Memo re Delegation to Commission Chair and Vice Chair Authority to Act on Executive Director's COI disclosures

Myers explained her reasoning for the memo as the Commission could not act on her disclosure of possible conflicts of interest without a public meeting.

Payne stated that the Commission could hold an emergency meeting or a special meeting.

Myers stated that she wanted to explore ways without having to hold a meeting.

Helt stated that it seems prudent to have a meeting and that is part of their job.

Thompson asked if there is a way to set up a criterion where a case is automatically opened no matter what. He stated he wanted to remove a decision from her.

Payne stated that someone still must open the case.
Helt asked if there was a way to create a standing order for a year where staff can open any complaints against the OGEC Executive Director and the decision is pre-done.

Helt stated that they could create guidelines on what criteria would need to be met. She suggested having a third person to assist with opening cases.
No action taken at this time.

Public Session Item 18, Trainers' Report
Trainer Angela Nolan addressed the Commission and summarized the training team's activity since the last meeting.

Public Session Item 19, Executive Director's Report
Myers summarized the agency's activities since the last meeting in September.
Myers stated the Public Meetings Law Workgroup is continuing to meet. She is meeting with smaller groups to go over topics and continue to fine tune topics.

She advised that the work session is scheduled for November 12, 2026, with four associations (The League of Oregon Cities, Special Districts Associations of Oregon, Association of Oregon Counties, and Oregon Community College Association), as requested by the Commission and associations to continue to address the topics brought up earlier.

She stated that there are other associations that OGEC is reaching out to, such as the School Board Association and Municipal Recorders Association.
Myers shared information regarding complaints that Helt requested.

Helt stated that she would like a cure and a timeframe for Statement of Economic

Interest filings and possible letters of advice being sent.

The Commission adjourned the meeting at approximately 2:02 p.m.

The next regularly scheduled Commission meeting will be November 13, 2026, at 3218 Pringle Road SE, Suite 220, Large Conference Room, Floor 2, Salem, Oregon 97302.

DRAFT

Gianluca Scoppa

Request to Waiver Late Submission Fee Friday, October 16, 2026 4:08:43 PM

Good afternoon, I spoke with Amber from OGEC over the phone regarding a

misunderstanding I had
regarding submitting any lobby hours to my employer vs individually submitting lobbying expenditures directly to OGEC. I just joined OCJ on September 11 and misunderstood the process for submitting expenditures, of which there were none for quarter 3.

I would like to humbly request a waiver for the one day late fee I was notified of. I will be sure to complete the quarterly filing in advance of the deadline moving forward and sincerely appreciate your understanding.

Please let me know if you need anything from me and thanks to Amber for walking me through this process.

Best regards,

Gianluca

- **Past Violations: NONE**
- **Current Penalties: 2026 Q3 Report ($10.00 owed)**

SVM

Recommendation: 1st violation - Letter of Education

From: JT Flowers
To: Mail * OGEC
Subject: Penalty Waiver Request
Date: Tuesday, October 27, 2026 1:50:06 PM
Attachments:

To whom it may concern,

My name is JT Flowers and for the past few years, I have been registered as a representational lobbyist for the Albina Vision Trust, my former employer. I left Albina Vision Trust at the beginning of July 2026 to found my own organization, Article V, and terminated my lobbyist status prior to my departure.

I did not realize, however, that because we were technically 10 days into Q3, I was supposed to file a lobbying report from my personal account. My account was tethered to my old work email address, and I accordingly lost access when I departed my role at the beginning of July.

Because of this confluence of events and misunderstandings, I was not aware of the need to file and all reminder notifications were being sent to an email address to which I no longer had access.

I thus am respectfully asking that my penalty for late filing be waived.

Thank you very much for your consideration,



JT Flowers
Founder & Executive Director

- **Past Violations: None**
- **Current Penalties: 2026 Q3 Report ($40.00 owed)**

SVM

Recommendation: 1st violation - Letter of Education

NELSON Ethan A

Request for Penalty Waiver Thursday, October 1, 2026 2:51:18 PM

Greetings,

I am requesting a waiver for the Late Fee Penalty that was assessed on my Lobbyist account on 7/16/26.

Thank you.

Ethan Nelson | Intergovernmental Relations

- **Past Violations: No Past Violations**
- **Current Penalties: 2026, Q2, $10**
- **Recommendation: 1st violation - Letter of Education** SVM

Tricia Tillman

Deactivate Lobbyist Status
Monday, October 5, 2026 1:52:47 PM

Good afternoon,

I am writing to request a waiver of fees that were incurred because I did not file Q2 reports.

I ended my employment at Espousal Strategies in April 2026 and did not cancel my status as an obvious or file my report at that time. I have since filed that report and ended my status with the help of staff in the Oregon government ethics commission, but I was hoping I could get the fees waived for this one time oversight.

Thank you.

Best wishes,
Latricia

- **Past Violations: No Past Violations**
- **Current Penalties: 2026, Q2, $130** SVM
- **Recommendation: 1st violation - Letter of Education**

[redacted] * OGEC

From: [redacted]
Sent: Monday, October 19, 2026 1:25 PM
To: Mail * OGEC; FOSTER Jessica * OGEC
Subject: Re: Failure to File Quarterly Report

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Penalty Waiver Request

I will request waiver per info below. Thanks for all of your patience.

PENALTY WAIVER REQUEST

Account username: [redacted]

Account first and last name: Janet (Jan) Lee

Reason for late report: I filed the lobby form under my name but did not realize I needed a separate filing for client, Water & Energy Resource Services (my firm). When I found out today that was also needed I immediately filed and received confirmation. I have subsequently withdrawn my registration as a lobbyist as I would not spend the amount of time required for reporting. I am aware I still need to file one more time in January and will file both forms of the report due. I apologize for the inconvenience. Jan

Oregon Government Ethics Commission

3218 Pringle Road SE, Suite 220

Salem, OR 97302-1544

503-378-5105

Oregon Government Ethics Commission Website

Please take our customer service survey!

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From: [redacted]
Sent: Monday, October 19, 2026 9:30 AM
To: Mail * OGEC <Mail@ogec.oregon.gov>
Subject: Re: Failure to File Quarterly Report

- **Past Violations: NONE**
- **Current Penalties: 2026, Q3, Amount Owed: $40**

SVM

Recommendation: 1st violation - Letter of Education

HEITZ Amber * OGEC

From: Michelle DuBarry <[redacted]>
Sent: Wednesday, October 21, 2026 3:33 PM
To: Mail * OGEC
Cc: [redacted]
Subject: letter of explanation

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Penalty Waiver Request

Dear Oregon Government Ethics Commissioners:

I am writing to request a waiver of late penalties incurred by Families for Safe Streets for filing our quarterly report late. Please consider the following:

- We are a newly-formed organization, with no staff and no regular source of income beyond a small amount of donations. A $60 penalty would be a significant hit on our bank account, which currently holds less than $1,000. This is our first time going through the reporting process.
- I am the Board Chair for the organization and also registered as a lobbyist. I filed a quarterly report, not realizing that I also needed to submit a client report. I initially thought the late notices were in error.
- I work full time, and it took me a few days to sort out what needed to be done. After receiving the late notice on Oct. 16, I was not able to connect by phone with your office until today (Oct. 21).
- Now that we have been through the process, we understand the reporting requirements and will be sure to submit on time in the future.

Thank you for your consideration.

Sincerely,

Michelle DuBarry
Board Chair, Families for Safe Streets (Portland chapter)

• Past Violations: NONE

• Current Penalties: 2026 Q3 Report ($60.00 owed)

Reccomendation 1st violation-Letter of Education SVM

Brian Brooks

Wednesday, October 28, 2026 12:25 PM

ABCbirds Penalty Waiver Request

Penalty Waiver Request

Hello,

I am writing to request a wavier of fines for American Bird Conservancy's late Q3 lobbyist registration for Steve Holmer.

Mr. Holmer was abruptly let go this summer and was unable to file without access to email. We apologize for the inconvenience. This is the first lobbyist filing violation and fine for ABC in Oregon and any of the several dozen states we work in. We are very proactive and punctual in maintaining our filings and because of Mr. Holmer's sudden departure, this one slipped through. We have already changed the person responsible with registration/filing authorization and it will not happen again.

Please let me know if you have any questions or comments. We appreciate the partnership we have with the State of Oregon and your proactive efforts to help us through this brief transition.

Thank you,

BB

Brian Brooks
Vice President, Advocacy and Threats

- **Past Violations: None**
- **Current Penalties: 2026 Q3 Report ($130.00 owed)**

SVM

Recommendation: 1st violation - Letter of Education

Aimee McAuliffe
Request for Waiver of Late Filing Penalty Sunday, October 11, 2026 3:35:39 PM

Dear Members of the Oregon Government Ethics Commission,

I am writing on behalf of the Professional Land Surveyors of Oregon (PLSO) to respectfully request a waiver or reduction of the penalties assessed for our late Lobbyist Client/Employer Quarterly Expenditure Reports.

In January 2025, the filing deadline coincided with our Annual Conference, which is our largest event of the year and requires my full attention as Executive Director. In July 2026, I was on a previously scheduled vacation in Washington, D.C., when the filing deadline occurred, and unfortunately, I overlooked it before leaving.

I only became aware of the outstanding penalties today, October 11, 2026.

I recognize that these circumstances do not excuse our responsibility to file on time, and I take responsibility for both oversights. I understand the importance of timely reporting and am putting additional reminders in place to ensure future deadlines are met, regardless of my schedule.

I would sincerely appreciate the Commission's consideration of a waiver or reduction of these penalties.

Thank you for your time and consideration.

Aimee McAuliffe
Executive Director
Professional Land Surveyors of Oregon

- **Past Violations: 2016 Q3 $20, PAID 10/20/2016**

- **Current Penalties:**
  - **2025 Q4 Report ($10.00 owed)**
  - **2026 Q2 Report ($20.00 owed)**

Recommendation: **2nd & 3rd violations - reduction to $15** SVM

Toni Tabora

Re: Explanation of late filing

Friday, October 16, 2026 7:16:23

Hello, I never received a response to this letter after the Commission's meeting in August. I still see penalties accrued in my account, but never received notice if my explanation letter was considered. Please let me know.

Toni Tabora
(she/her)
Interim Executive Director

On Thu, Jul 23, 2026 at 1:25 PM Toni Tabora wrote:

Hello,
I am the new Interim Executive Director at Rahab's Sisters, the fiscal sponsor for Sex Worker Affirming Advocates (SWAA). We have been in a leadership transition including the departure of Rahab's long-time executive director and my onboarding as interim executive director. I did not see the reporting window reminders until last week and I was not able to access my accounts due to the transitions of emails and usernames for the OGEC report filing site as well as access to accounts on my end.
I called and left several messages as well as emails beginning July 16 to have someone help me gain access. I learned the several messages were left for me, but I was unable to access them because I was not receiving them and also because I was traveling July 18-21. I was finally able to send new user account information yesterday and update my accounts and file the report today. We had no activity to report.
I kindly request that the fees be waived due to this unusual situation of transition, and because we also had no lobbying activities to
report.
Thanks for your consideration.
Toni Tabora
(she/her)
Interim Executive Director

- **Past Violations: 2026 Q2 Report ($80.00 owed)**
- **Current Penalties: 2026 Q3 Report ($10.00 owed)**
- **Recommendation: 2026 Q2 - 1st violation - Letter of Education**
  2026 Q3 - 2nd violation - no reduction - $10

SVM

OACO
Oregon Advocacy Commissions Office

Oregon Advocacy Commissions Office
Executive Director: Jeff Selby
o

October 22, 2026To Whom It May Concern

I am writing to request a waiver of the $150 in late fees assessed to OACO for quarterly filings that were not submitted on time during staff FMLA absences in 2024 and 2025. The staff members responsible for these filings were unable to access the system to submit their reports while on leave.

Although the fees have been paid, I respectfully request that they be waived and the $150 refunded to OACO.

Best regards,

Ava Stevens, Executive Support

- **Past Violations:**
  - **12/19/2016 2016 Q3 Letter of Ed**
  - **3/14/2019 2018 Q4 ($20.00) PAID**
  - **5/18/2022 2022 Q1 ($40.00) PAID**

- **Current Penalties: 2025 Q1 ($150.00 owed)**

Recommendation: 2025 Q1 - reduction to $20 SVM

RE: OR Gov. Ethics Commission re EFS Account Balance - James Anderson
Friday, October 30, 2026 8:28:53 AM

Good Morning Commission –

This was an oversight on our end. We did not receive the reporting rates from lobby firm in our normal manner which made reporting of Client/lobby/SEI for 2026 Q! late AND we have a new bookkeeper in place (other bookkeeper was here for 30 years) and I was under the impression that the previous bookkeeper had reached out and requested a waiver of the fee. Not that any of this is an excuse, but is there any chance you would be willing to waive the $10.00 late fee for this filing for James Anderson at Operating Engineers Local 701 (IUOE). Thank you for your consideration!

Best Regards,
Melissa Savage

- **Past Violations: 2021 Q1 Report, Paid 4/30/2021**
- **Current Penalties: 2026 Q1 Report ($10.00 owed)**

Recommendation: 2nd violation - no reduction as penalty is below minimum threshold

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Lena Richardson**	**STIPULATED FINAL ORDER**
Case No.:	**26-103PJS**	
Date:	**November 13, 2026**	

---

1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Lena Richardson.

2. Jurisdiction:

At all material times, Lena Richardson was the Mayor of the City of Shady Cove (City). As such, Lena Richardson was a public official subject to the jurisdiction of the Commission pursuant to ORS Chapter 244.

3. Applicable Law:

A. ORS 192.630(1) requires that all meetings of the governing body of a public body shall be open to the public and all persons shall be permitted to attend any meeting except as otherwise provided in Public Meetings Law.

B. Pursuant to ORS 192.670(3)(a), “all meetings held by a governing body of a public body, excluding executive session, must provide to members of the general public, to the extent reasonably possible, an opportunity to access and attend the meeting by telephone, video or other electronic or virtual means.”

C. ORS 192.640(1) provides that a governing body "shall provide for and give public notice, reasonably calculated to give actual notice to interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

D. OAR 199-050-0040(3) outlines what is required to be included in a meeting's public notice. That information includes the time, date, location of the meeting, and to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means. [OAR 199-050-0040(3)(a)].

E. The public notice is also required to include the agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting. [ORS 192.640(1); OAR 199-050-0040(3)(b)].

4. Stipulated Facts:

A. Lena Richardson is the former Mayor of the City of Shady Cove and held that position in February 2026.

B. The City Council held a public meeting at the City Hall Chamber at 10:00 a.m. on February 2, 2026. The meeting notice posted on January 29, 2026 states that the City Council Workshop would include a "Discussion about Franchise Agreements vs Rights of Way Licensing/Permits." The recording of the

February 2 meeting indicates that the City Council discussed a variety of franchise and rights of way agreements.

C. Prior to the February 2, 2026 City Council meeting, the City received a request for electronic access to the meeting; however, telephone, video, or electronic access to the meeting was not provided. Although it was reasonably possible for the City to provide telephone or other electronic access to the public for their meetings, the City Council failed to provide such access to their February 2, 2026 meeting, in violation of ORS 192.670(3)(a).

D. The February 2, 2026 meeting notice did not include an electronic link or telephone access information to allow members of the public to attend the meeting remotely. Thus, the City Council violated ORS 192.640(1) and OAR 199-050-0040(3)(a) by failing to include required information in the meeting notice.

E. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 192.640(1), ORS 192.670(3)(a), and OAR 199-050-0040(3)(a).

F. Lena Richardson contends that the facts set forth in this Stipulated Final Order are insufficient to establish a violation of ORS 192.640(1), ORS 192.670(3), and OAR 199-050-0040(3); but she agrees to the entry of this stipulated final order in order to resolve this matter.

5. Terms of Settlement:

The parties agree as follows:

A. On June 12, 2026, the Commission considered information in the preliminary review phase of Case No. 26-103PJS and acted to find cause to initiate an investigation of this matter. Lena Richardson has indicated

that she wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the investigative phase.

B. Lena Richardson will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Lena Richardson within the scope of the above-referenced case.

D. Lena Richardson will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

6. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

7. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Lena Richardson agrees to waive her right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Lena Richardson agrees to waive her right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:
Lena Richardson
1FD0ADD08EF4471...

October 29, 2026

Respondent: Lena Richardson — Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Steve Mitchell**	**STIPULATED FINAL ORDER**
Case No.:	**26-104PJS**	
Date:	**November 13, 2026**	

---

1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Steve Mitchell.

2. Jurisdiction:

At all material times, Steve Mitchell was a Member of the City Council for the City of Shady Cove (City). As such, Steve Mitchell was a public official subject to the jurisdiction of the Commission pursuant to ORS Chapter 244.

3. Applicable Law:

A. ORS 192.630(1) requires that all meetings of the governing body of a public body shall be open to the public and all persons shall be permitted to attend any meeting except as otherwise provided in Public Meetings Law.

B. Pursuant to ORS 192.670(3)(a), “all meetings held by a governing body of a public body, excluding executive session, must provide to members of the general public, to the extent reasonably possible, an opportunity to access and attend the meeting by telephone, video or other electronic or virtual means.”

C. ORS 192.640(1) provides that a governing body "shall provide for and give public notice, reasonably calculated to give actual notice to interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

D. OAR 199-050-0040(3) outlines what is required to be included in a meeting's public notice. That information includes the time, date, location of the meeting, and to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means. [OAR 199-050-0040(3)(a)].

E. The public notice is also required to include the agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting. [ORS 192.640(1); OAR 199-050-0040(3)(b)].

4. Stipulated Facts:

A. Steve Mitchell is a Member of the City Council for the City of Shady Cove and held that position in February 2026.

B. The City Council held a public meeting at the City Hall Chamber at 10:00 a.m. on February 2, 2026. The meeting notice posted on January 29, 2026 states that the City Council Workshop would include a "Discussion about Franchise Agreements vs Rights of Way Licensing/Permits." The recording of the

February 2 meeting indicates that the City Council discussed a variety of franchise and rights of way agreements.

C. Prior to the February 2, 2026 City Council meeting, the City received a request for electronic access to the meeting; however, telephone, video, or electronic access to the meeting was not provided. Although it was reasonably possible for the City to provide telephone or other electronic access to the public for their meetings, the City Council failed to provide such access to their February 2, 2026 meeting, in violation of ORS 192.670(3)(a).

D. The February 2, 2026 meeting notice did not include an electronic link or telephone access information to allow members of the public to attend the meeting remotely. Thus, the City Council violated ORS 192.640(1) and OAR 199-050-0040(3)(a) by failing to include required information in the meeting notice.

E. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 192.640(1), ORS 192.670(3)(a), and OAR 199-050-0040(3)(a).

F. Steve Mitchell contends that the facts set forth in this Stipulated Final Order are insufficient to establish a violation of ORS 192.640(1), ORS 192.670(3), and OAR 199-050-0040(3); but he agrees to the entry of this stipulated final order in order to resolve this matter.

5. Terms of Settlement:

The parties agree as follows:

A. On June 12, 2026, the Commission considered information in the preliminary review phase of Case No. 26-104PJS and acted to find cause to initiate an investigation of this matter. Steve Mitchell has indicated that

he wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the investigative phase.

B. Steve Mitchell will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Steve Mitchell within the scope of the above-referenced case.

D. Steve Mitchell will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

6. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

7. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Steve Mitchell agrees to waive his right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Steve Mitchell agrees to waive his right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

DocuSigned by:
Steve Mitchell
DFDF09F01E504CF...

October 30, 2026

Respondent: Steve Mitchell — Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Kathy Nuckles**	**STIPULATED FINAL ORDER**
Case No.:	**26-105PJS**	
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Kathy Nuckles.

2. Jurisdiction:

At all material times, Kathy Nuckles was a Member of the City Council for the City of Shady Cove (City). As such, Kathy Nuckles was a public official subject to the jurisdiction of the Commission pursuant to ORS Chapter 244.

3. Applicable Law:

A. ORS 192.630(1) requires that all meetings of the governing body of a public body shall be open to the public and all persons shall be permitted to attend any meeting except as otherwise provided in Public Meetings Law.

B. Pursuant to ORS 192.670(3)(a), “all meetings held by a governing body of a public body, excluding executive session, must provide to members of the general public, to the extent reasonably possible, an opportunity to access and attend the meeting by telephone, video or other electronic or virtual means.”

C. ORS 192.640(1) provides that a governing body "shall provide for and give public notice, reasonably calculated to give actual notice to interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

D. OAR 199-050-0040(3) outlines what is required to be included in a meeting's public notice. That information includes the time, date, location of the meeting, and to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means. [OAR 199-050-0040(3)(a)].

E. The public notice is also required to include the agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting. [ORS 192.640(1); OAR 199-050-0040(3)(b)].

4. Stipulated Facts:

A. Kathy Nuckles is a Member of the City Council for the City of Shady Cove and held that position in February 2026.

B. The City Council held a public meeting at the City Hall Chamber at 10:00 a.m. on February 2, 2026. The meeting notice posted on January 29, 2026 states that the City Council Workshop would include a "Discussion about Franchise Agreements vs Rights of Way Licensing/Permits." The recording of the

February 2 meeting indicates that the City Council discussed a variety of franchise and rights of way agreements.

C. Prior to the February 2, 2026 City Council meeting, the City received a request for electronic access to the meeting; however, telephone, video, or electronic access to the meeting was not provided. Although it was reasonably possible for the City to provide telephone or other electronic access to the public for their meetings, the City Council failed to provide such access to their February 2, 2026 meeting, in violation of ORS 192.670(3)(a).

D. The February 2, 2026 meeting notice did not include an electronic link or telephone access information to allow members of the public to attend the meeting remotely. Thus, the City Council violated ORS 192.640(1) and OAR 199-050-0040(3)(a) by failing to include required information in the meeting notice.

E. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 192.640(1), ORS 192.670(3)(a), and OAR 199-050-0040(3)(a).

F. Kathy Nuckles contends that the facts set forth in this Stipulated Final Order are insufficient to establish a violation of ORS 192.640(1), ORS 192.670(3), and OAR 199-050-0040(3); but she agrees to the entry of this stipulated final order in order to resolve this matter.

5. Terms of Settlement:

The parties agree as follows:

A. On June 12, 2026, the Commission considered information in the preliminary review phase of Case No. 26-105PJS and acted to find cause to initiate an investigation of this matter. Kathy Nuckles has indicated that

she wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the investigative phase.

B. Kathy Nuckles will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Kathy Nuckles within the scope of the above-referenced case.

D. Kathy Nuckles will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

6. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

7. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Kathy Nuckles agrees to waive her right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Kathy Nuckles agrees to waive her right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:
Kathy Nuckles
DCDA150451BF4DF...

October 29, 2026

Respondent: Kathy Nuckles — Date

Shenoa Payne, Chairperson — Date
Oregon Government Ethics Commission

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Jeffrey Vanier**	**STIPULATED FINAL ORDER**
Case No.:	**26-106PJS**	
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Jeffrey Vanier.

2. Jurisdiction:

At all material times, Jeffrey Vanier was a Member of the City Council for the City of Shady Cove (City). As such, Jeffrey Vanier was a public official subject to the jurisdiction of the Commission pursuant to ORS Chapter 244.

3. Applicable Law:

A. ORS 192.630(1) requires that all meetings of the governing body of a public body shall be open to the public and all persons shall be permitted to attend any meeting except as otherwise provided in Public Meetings Law.

B. Pursuant to ORS 192.670(3)(a), “all meetings held by a governing body of a public body, excluding executive session, must provide to members of the general public, to the extent reasonably possible, an opportunity to access and attend the meeting by telephone, video or other electronic or virtual means.”

C. ORS 192.640(1) provides that a governing body "shall provide for and give public notice, reasonably calculated to give actual notice to interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

D. OAR 199-050-0040(3) outlines what is required to be included in a meeting's public notice. That information includes the time, date, location of the meeting, and to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means. [OAR 199-050-0040(3)(a)].

E. The public notice is also required to include the agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting. [ORS 192.640(1); OAR 199-050-0040(3)(b)].

4. Stipulated Facts:

A. Jeffrey Vanier was a Member of the City Council for the City of Shady Cove and held that position in February 2026.

B. The City Council held a public meeting at the City Hall Chamber at 10:00 a.m. on February 2, 2026. The meeting notice posted on January 29, 2026 states that the City Council Workshop would include a "Discussion about Franchise Agreements vs Rights of Way Licensing/Permits." The recording of the

February 2 meeting indicates that the City Council discussed a variety of franchise and rights of way agreements.

C. Prior to the February 2, 2026 City Council meeting, the City received a request for electronic access to the meeting; however, telephone, video, or electronic access to the meeting was not provided. Although it was reasonably possible for the City to provide telephone or other electronic access to the public for their meetings, the City Council failed to provide such access to their February 2, 2026 meeting, in violation of ORS 192.670(3)(a).

D. The February 2, 2026 meeting notice did not include an electronic link or telephone access information to allow members of the public to attend the meeting remotely. Thus, the City Council violated ORS 192.640(1) and OAR 199-050-0040(3)(a) by failing to include required information in the meeting notice.

E. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 192.640(1), ORS 192.670(3)(a), and OAR 199-050-0040(3)(a).

F. Jeffrey Vanier contends that the facts set forth in this Stipulated Final Order are insufficient to establish a violation of ORS 192.640(1), ORS 192.670(3), and OAR 199-050-0040(3); but he agrees to the entry of this stipulated final order in order to resolve this matter.

5. Terms of Settlement:

The parties agree as follows:

A. On June 12, 2026, the Commission considered information in the preliminary review phase of Case No. 26-106PJS and acted to find cause to initiate an investigation of this matter. Jeffrey Vanier has indicated that

he wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the investigative phase.

B. Jeffrey Vanier will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Jeffrey Vanier within the scope of the above-referenced case.

D. Jeffrey Vanier will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

6. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

7. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Jeffrey Vanier agrees to waive his right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Jeffrey Vanier agrees to waive his right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

DocuSigned by:
Jeffrey Vanier
0807DABF9D5C4ED...

October 31, 2026

Respondent: Jeffrey Vanier — Date

Shenoa Payne, Chairperson — Date
Oregon Government Ethics Commission

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Paige Winfrey**	**STIPULATED FINAL ORDER**
Case No.:	**26-107PJS**	
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Paige Winfrey.

2. Jurisdiction:

At all material times, Paige Winfrey was a Member of the City Council for the City of Shady Cove (City). As such, Paige Winfrey was a public official subject to the jurisdiction of the Commission pursuant to ORS Chapter 244.

3. Applicable Law:

A. ORS 192.630(1) requires that all meetings of the governing body of a public body shall be open to the public and all persons shall be permitted to attend any meeting except as otherwise provided in Public Meetings Law.

B. Pursuant to ORS 192.670(3)(a), “all meetings held by a governing body of a public body, excluding executive session, must provide to members of the general public, to the extent reasonably possible, an opportunity to access and attend the meeting by telephone, video or other electronic or virtual means.”

C. ORS 192.640(1) provides that a governing body "shall provide for and give public notice, reasonably calculated to give actual notice to interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

D. OAR 199-050-0040(3) outlines what is required to be included in a meeting's public notice. That information includes the time, date, location of the meeting, and to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means. [OAR 199-050-0040(3)(a)].

E. The public notice is also required to include the agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting. [ORS 192.640(1); OAR 199-050-0040(3)(b)].

4. Stipulated Facts:

A. Paige Winfrey is a Member of the City Council for the City of Shady Cove and held that position in February 2026.

B. The City Council held a public meeting at the City Hall Chamber at 10:00 a.m. on February 2, 2026. The meeting notice posted on January 29, 2026 states that the City Council Workshop would include a "Discussion about Franchise Agreements vs Rights of Way Licensing/Permits." The recording of the

February 2 meeting indicates that the City Council discussed a variety of franchise and rights of way agreements.

C. Prior to the February 2, 2026 City Council meeting, the City received a request for electronic access to the meeting; however, telephone, video, or electronic access to the meeting was not provided. Although it was reasonably possible for the City to provide telephone or other electronic access to the public for their meetings, the City Council failed to provide such access to their February 2, 2026 meeting, in violation of ORS 192.670(3)(a).

D. The February 2, 2026 meeting notice did not include an electronic link or telephone access information to allow members of the public to attend the meeting remotely. Thus, the City Council violated ORS 192.640(1) and OAR 199-050-0040(3)(a) by failing to include required information in the meeting notice.

E. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 192.640(1), ORS 192.670(3)(a), and OAR 199-050-0040(3)(a).

5. Terms of Settlement:

The parties agree as follows:

A. On June 12, 2026, the Commission considered information in the preliminary review phase of Case No. 26-107PJS and acted to find cause to initiate an investigation of this matter. Paige Winfrey has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the investigative phase.

B. In lieu of a civil penalty, Paige Winfrey will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Paige Winfrey within the scope of the above-referenced case.

D. Paige Winfrey will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

6. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

7. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Paige Winfrey agrees to waive her right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Paige Winfrey agrees to waive her right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:
Paige Winfrey
61F06B32A337...

October 28, 2026

Respondent: Paige Winfrey — Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMISSION

In the Matter of:

	Adrien Bennings	**STIPULATED FINAL ORDER**
Case No.:	**26-141EJS**	
Date:	**November 13, 2026**	

1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Dr. Adrien Bennings.

2. Jurisdiction:

At all material times, Dr. Bennings was the President of Portland Community College. As such, Dr. Bennings was a public official subject to the jurisdiction of the Commission pursuant to ORS Chapter 244.

3. Applicable Law:

A. ORS 244.040(1) prohibits a public official from using or attempting to use their official position or office to obtain a financial gain or avoid a financial detriment for themselves, their relatives or household members, or any business with which they or their relatives or household members are associated, if the

financial gain or avoidance of financial detriment would not otherwise be available but for the public official's holding their official position or office.

B. ORS 244.020(16)(a) states that a "relative" includes the "spouse, parent, stepparent, child, sibling, stepsibling, son-in-law or daughter-in-law of the public official or candidate."

C. ORS 244.020(3) defines a "business with which a person is associated" as including any private business or closely held corporation of which the person or their relative is a director, officer, owner, employee, or agent, or one in which the person or their relative currently owns or has owned within the preceding year, stock, another form of equity interest, stock options or debt instruments worth $1,000 or more, or for those public officials required to file a Statement of Economic Interest, any business the public official lists as a source of income on their SEI.

4. Factual and Legal Assertions:

A. Dr. Bennings was the President of Portland Community College (PCC) from July 1, 2022 until June 30, 2026.

B. Jonathan Bennings is Dr. Bennings' spouse, making him a relative as defined in ORS 244.020(16)(a).

C. G7 Enterprises LLC, a professional consulting business, was first registered with the Oregon Secretary of State on October 27, 2022. Dr. Bennings and Jonathan Bennings are both Members of G7 Enterprises LLC. Therefore, G7 Enterprises LLC is a business with which Dr. Bennings and her relative are associated.

D. Dr. Bennings developed the phrase "One Together Together One" expressly for her candidacy for President of PCC. The phrase was first introduced during her presidential finalist forums on March 23, 2022, as an expression of

her personal leadership philosophy and proposed approach to leading the college, including her 30-60-90-day plan. See Exhibit (Dr. Bennings' finalist materials).

E. When Dr. Bennings went through the selection process to become the PCC President in early 2022, she used the phrase "One Together Together One" in association with her proposed "30-60-90" day plan.

F. After being selected for the PCC President position in April 2022, she continued to sue the phrase both in a personal capacity and a professional capacity. In September 2022, Dr. Bennings created a monthly e-newsletter she titled "One Together. Together One. 1TT1," which she distributed to PCC staff via email from the Office of the President.

G. In January 2023, Dr. Bennings instructed the creation of PCC's 1TT1 Spotlight," a recognition program designed to "highlight student success initiatives and celebrate institutional milestones in fulfillment of PCC's mission." Dr. Bennings widely incorporated the phrase "One Together Together One" into her work at PCC to express her professional outlook and overall leadership approach.

H. On August 21, 2023, G7 Enterprises LLC filed a Trademark/Service Mark Application (trademark application) for "ONE TOGETHER TOGETHER ONE" with the United States Patent and Trademark Office (USPTO). The trademark application indicates that the phrase was first used in commerce as early as March 23, 2022, and it indicates that the phrase was in use in commerce as of the filing date of the application. The trademark application indicates that the phrase was used in a "point of purchase display" on the website www.adrienbennings.com, and it states that the phrase was used in connection with "[p]rofessional coaching services in the field of personal branding, leadership, wellness, and personal development." As of August 13,

2024, G7 Enterprises LLC became the registered owner of the service mark “ONE TOGETHER TOGETHER ONE” under the USPTO.

I. After trademarking the phrase with her business, Dr. Bennings continued to use “One Together Together one” in her role as PCC President for PCC events, official PCC communication, and PCC marketing campaigns. Dr. Bennings continued to promote PCC’s 1TT1 Spotlight program until it ended in December 2025. The 1TT1 Spotlight program widely used the phrase “One Together Together one.” Through 2026, PCC’s Office of the President webpage prominently featured the phrase “One Together Together One.” Additionally, Dr. Bennings continued to use the phrase “One together, together one” in messaging including PCC newsletters and her email signature after the phrase was trademarked.

J. Michael Matthews, PCC’s Chief Procurement Officer, explained by email that he had conducted historical and current searches across the College's contract and accounting systems. His email states that there have been no supplier setup request, contract, purchase order, procurement card transaction, or direct payment involving G7 Enterprises LLC, JBT (Jonathan Bennings Technologies), Stuck Up Studio, or any related subsidiary.

K. In connection with her separation from Portland Community College, Dr. Bennings entered into a Separation Agreement on June 30, 2026 that expressly addressed PCC’s continued use of the phrase ‘One Together Together One.’ The agreement provides that Dr. Bennings releases PCC from any and all claims she may have related to PCC's use of the slogan.

L. The Commission contends that Dr. Bennings used her official position to create an opportunity for her own financial gain when she used and promoted the use of the phrase “One Together Together One” as PCC President. When G7 Enterprises LLC trademarked the phrase, it became an asset of financial

value for a business with which Dr. Bennings is associated; however, she continued to use the phrase for PCC events and programs, and on the PCC website. But for her position as PCC President, Dr. Bennings would not have had the opportunity to promote the phrase on PCC messaging, both before and after it was trademarked. The Commission therefore contends that the results of its investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 244.040(1).

M. Dr. Bennings disputes that she used or attempted to use her official position to obtain a financial gain for herself or for any business with which she is associated, and contends that the facts asserted in Section 4 of this Order are insufficient to establish a violation of ORS 244.040(1). Dr. Bennings contends that she developed the phrase “One Together Together One” as an expression of her personal leadership philosophy, that the phrase reflected leadership principles extending beyond her role as President, and that she pursued trademark protection to preserve the phrase’s association with her broader professional identity, not to obtain a private financial benefit. She further contends that a registered mark has no inherent value apart from consumer recognition associated with its use in commerce; that there is no evidence of any valuation of the mark or of any revenue, licensing arrangement, or other payment attributable to PCC’s use of the phrase; and that PCC’s own review confirmed that no contract, purchase order, or payment was ever requested or made involving G7 Enterprises LLC or any related business. Dr. Bennings further contends that the fact that her position afforded her access to PCC’s institutional communications does not, standing alone, establish that she obtained or attempted to obtain a financial gain that would not otherwise have been available but for her holding that position. Consequently, Dr. Bennings contends that the evidence, if submitted through

exhibits and testimony at a contested case hearing, would not establish a preponderance of evidence in support of finding such a violation.

5. Terms of Settlement:

The parties agree as follows:

A. On May 13, 2026, the Commission considered information in the preliminary review phase of Case No. 26-141EJS and acted to find cause to initiate an investigation of this matter.

B. Dr. Bennings has indicated that due to the burden of this matter pending and her desire to bring this matter to a close with finality, she wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the investigative phase.

C. In lieu of a civil penalty, Dr. Bennings will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

D. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Dr. Bennings within the scope of the above-referenced case.

E. Dr. Bennings will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

6. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

7. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Dr. Bennings agrees to waive her right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Dr. Bennings agrees to waive her right to obtain judicial review of this order as provided in ORS 183.482.

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:
Dr. Adrien Bennings
CC7A0E7C459E450...

November 2, 2026

Respondent: Dr. Adrien Bennings — Date

Shenoa Payne, Chairperson — Date
Oregon Government Ethics Commission

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Carol Raymond**	**STIPULATED FINAL ORDER**
Case No.:	**26-198EDP**	
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Carol Raymond.

2. Jurisdiction:

A. Carol Raymond is the Mayor and a Member of the City of Antelope (City) City Council (Council). As such, she was a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law in ORS Chapter 244.

B. On June 12, 2026, the Commission considered the information in the preliminary review phase of Case No. 26-198EDP and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 244.020(16)(a) defines a “relative” to include the spouse, parent, stepparent, child sibling, stepsibling, son-in-law or daughter-in-law of the public official. In this case, Carol Raymond’s spouse, Patrick Raymond, meets this definition.

B. ORS 244.040(1) prohibits a public official from using or attempting to use their official position or office to obtain a financial gain or avoid a financial detriment for themselves, their relatives or household members, or any business with which they or their relatives or household members are associated, if the financial gain or avoidance of financial detriment would not otherwise be available but for the public official's holding their official position or office.

C. A conflict of interest means any action, decision, or recommendation by a person acting in their capacity as a public official, the effect of which would be (actual conflict of interest) or could be (potential conflict of interest) to the private financial benefit or detriment of the person, their relative, their household member or a business with which they, their relative, or their household member are associated. [ORS 244.020(1) and ORS 244.020(13)].

D. When met with a conflict of interest, a public official serving on a board or commission, such as Carol Raymond, must make a public announcement of the nature of the conflict of interest. If met with a potential conflict of interest, this announcement must be made prior to taking any action on the matter in the capacity of a public official. If met with an actual conflict of interest, the public official must make the public announcement and then refrain from participating as a public official in any discussion, debate or vote on the matter out of which the actual conflict of interest arises, unless their vote is necessary to meet a minimum vote requirement, in which case the public official may vote but may not participate in any discussion or debate on the matter. [ORS 244.120(2)].

4. Stipulated Facts:

A. Carol Raymond and Patrick Raymond were elected to the positions of Mayor and Council Member and joined the City Council on January 2, 2026.

B. In addition to his elected position, Mr. Raymond volunteered as the City's watermaster.

C. On April 9, 2026, the Council convened a public meeting. Prior to the meeting, Ms. Raymond added a discussion item to the meeting agenda in order to have the Council consider a paid stipend for the City's watermaster.

D. At the April 9th meeting, the Council discussed and voted to approve the watermaster stipend. During the discussions, Ms. Raymond stated that it was common practice for the watermaster to receive a stipend and added that because her spouse was volunteering, the Council should consider providing him with the stipend. Ms. Raymond failed to declare a conflict of interest prior to discussing the stipend for her spouse or prior to the vote on the matter, though she did abstain.

E. Because Ms. Raymond's actions, decisions and recommendations when adding the watermaster stipend discussion to the April 9th meeting agenda and advocating for the watermaster stipend during a Council meeting, would or could have a private financial impact on her spouse, she was met with an actual conflict of interest. Thus, she was required to publicly declare the nature of her conflict of interest and abstain from the discussions during the Council's consideration and the vote on the watermaster stipend. By failing to do so, Ms. Raymond violated ORS 244.120.

F. Through her actions, Ms. Raymond also used or attempted to use her position to obtain a financial gain for her spouse by adding the issue to the agenda and advocating for her spouse, specifically, to approve the watermaster stipend. These opportunities were only available to Ms. Raymond but for her official position as Mayor and Council Member. Thus, she violated ORS 244.040(1).

5. Conclusion/Violation

A. Because Ms. Raymond failed to disclose the nature of her conflict of interest at the April 9, 2026, meeting: concerning her inclusion of watermaster stipend as a discussion item to the meeting agenda; and when advocating for the approval of the stipend during the public meeting, Ms. Raymond's actions, decisions and recommendations, as described in paragraph 4(D), constitute one violation of ORS 244.120(2)(b) with one equivalent action.

B. The actions described in paragraph 4(E) constitute one violation of ORS 244.040(1) with one equivalent action. But for Ms. Raymond's official position on the City Council, she would not have had the same opportunities to obtain or attempt to obtain a financial gain for her spouse. Thus, Ms. Raymond engaged in a prohibited use of office.

C. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 244.040(1) and ORS 244.120(2) with one equivalent action each.

6. Terms of Settlement:

The parties agree as follows:

A. Carol Ryamond has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigation phase.

B. In lieu of a civil penalty, Carol Raymond will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Carol Raymond within the scope of the above-referenced case.

D. Carol Raymond will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

7. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

8. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Carol Raymond agrees to waive her right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Carol Raymond agrees to waive her right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this

stipulated final order on the dates set forth below.

Signed by:
Carol Raymond
749EFD16622D4EF...

October 30, 2026

Respondent: Carol Raymond — Date

Shenoa Payne, Chairperson — Date
Oregon Government Ethics Commission

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Wendy Adams**	**STIPULATED FINAL ORDER**
Case No.:	**26-291EDP**	
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Wendy Adams.

2. Jurisdiction:

A. Wendy Adams was a member of the City of Pheonix (City) Planning Commission. As such, she was a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law in ORS Chapter 244.

B. On August 14, 2026, the Commission considered the information in the preliminary review phase of Case No. 26-291EDP and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 244.020(16)(a) defines a “relative” to include the spouse, parent, stepparent, child sibling, stepsibling, son-in-law or daughter-in-law of the public official. In this case, Ms. Adam’s spouse meets this definition.

B. A conflict of interest means any action, decision, or recommendation by a person acting in their capacity as a public official, the effect of which would be (actual conflict of interest) or could be (potential conflict of interest) to the private financial benefit or detriment of the person, their relative, their household member or a business with which they, their relative, or their household member are associated. [ORS 244.020(1) and ORS 244.020(13)].

C. When met with a conflict of interest, a public official serving on a board or commission, such as Wendy Adams, must make a public announcement of the nature of the conflict of interest. If met with a potential conflict of interest, this announcement must be made prior to taking any action on the matter in the capacity of a public official. If met with an actual conflict of interest, the public official must make the public announcement and then refrain from participating as a public official in any discussion, debate or vote on the matter out of which the actual conflict of interest arises, unless their vote is necessary to meet a minimum vote requirement, in which case the public official may vote but may not participate in any discussion or debate on the matter. [ORS 244.120(2)].

4. Stipulated Facts:

A. The Planning Commission is responsible for reviewing and approving City planning policies and decisions. One of the matters considered by the Planning Commission was a site construction application (the Developer Application) which would establish a 7-Eleven convenience store and refueling station (the proposed Property) in the City.

B. Planning Commission Member Wendy Adams and her spouse live in a community which borders the proposed Property.

C. On May 11, 2026, the Planning Commission considered public testimony on whether to approve the Developer Application. Some of the concerns raised

by the public regarding the proposed Property included congestion, ground water contamination, livability and the impact on local property values. During the Planning Commission's consideration of the matter, Ms. Adam's did not declare a conflict of interest and recommended that the Planning Commission keep the public comment period open longer and participated in several votes regarding the Developer Application.

D. Because Ms. Adam's actions at the May 11th meeting, when recommending and voting on the consideration of the Developer Application, could financially impact the property value and her and her spouse's home, she was met with a potential conflict of interest. Accordingly, before participating in the discussions and votes regarding the Developer Application, Ms. Adams was required to publicly declare the nature of her conflict of interest. By failing to do so, she violated ORS 244.120(2).

5. Conclusion/Violation

A. The actions described in paragraph 4(D) constitute one violation of ORS 244.120(2). When taking actions and making recommendations regarding the Developer Application at the Planning Commission's May 11th meeting, which could financially impact her and her relative, Ms. Adams was met with a potential conflict of interest. As such, she was statutorily required to declare the nature of her conflict of interest. By failing to do so, Ms. Adams violated ORS 244.120(2).

B. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 244.120(2).

6. Terms of Settlement:

The parties agree as follows:

A. Wendy Adams has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigation phase.

B. In lieu of a civil penalty, Wendy Adams will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Wendy Adams within the scope of the above-referenced case.

D. Wendy Adams will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

7. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

8. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Wendy Adams agrees to waive her right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this

Case No. 26-291EDP
Adams Stipulated Final Order – Page 5
matter shall become part of the record.

By signing this agreement, Wendy Adams agrees to waive her right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:
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Respondent: Wendy Adams — October 28, 2026
Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of: **Larry Magill** Case No.: **26-363ESP** Date: **August 27, 2026**	**STIPULATED FINAL ORDER**

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Larry Magill.

2. Jurisdiction:

At all material times, Larry Magill was the Fire Chief for the Wamic Rural Fire Protection District. As such, Larry Magill was a public official subject to the jurisdiction of the Commission pursuant to ORS Chapter 244.

3. Applicable Law:

A. ORS 244.020(16) defines a relative to include the spouse, parent, stepparent, child, sibling, stepsibling, son-in-law or daughter-in-law of the public official. In this case, Larry Magill's wife meets this definition.

B. A conflict of interest means any action, decision, or recommendation by a person acting in their capacity as a public official, the effect of which would be (actual conflict of interest) or could be (potential conflict of interest) to the private financial benefit or detriment of the person, their relative, their household member or a business with which they, their relative, or their household member are associated. [ORS 244.020(1) and ORS 244.020(13)].

C. When met with a conflict of interest, a public official serving as an employee, such as Larry Magill, must provide written notification to his appointing authority of the nature of the conflict of interest, and request that the

appointing authority dispose of the matter giving rise to the conflict. Upon receipt of the request, the appointing authority shall designate within a reasonable time an alternate to dispose of the matter, or shall direct the official to dispose of the matter in a manner specified by the appointing authority. [ORS 244.120(1)(c)].

4. Stipulated Facts:

A. Larry Magill is the Fire Chief (Chief) for the WAMIC Rural Fire Protection District (RFPD).

B. Jamie Magill is Larry Magill's spouse, making her a relative as defined in ORS 244.020(16)(a).

C. In November 2022, Larry Magill applied for the Oregon Fire Service Capacity Grant, which provided 36 months of funding for fire protection personnel. When Mr. Magill applied for the grant, he was met with a potential conflict of interest as the grant funds could be used to fund the positions held by he and his wife.

D. Mr. Magill did not provide written notification to his appointing authority of the potential conflict of interest presented by his actions with respect to the Oregon Fire Service Capacity Grant, and did not request that his appointing authority dispose of the matter giving rise to the conflict.

E. During a meeting on November 19, 2022, Larry Magill discussed a future tax base measure to provide permanent funding to the District and the required steps to initiate the process of getting it onto the ballot. When Mr. Magill discussed the tax base measure with the Board, he was met with a potential conflict of interest, as the passing of a tax base would provide funding to the District, which could result in funding for positions held by Mr. Magill and his wife.

F. Mr. Magill did not provide written notification to his appointing authority of the potential conflict of interest, and did not request that his appointing authority dispose of the matter giving rise to the conflict.

G. Mr. Magill contends that all actions taken by him in connection with funding for the District were at the request and direction of the Board, which knew that funds could or would be used to employ him and his spouse, and that he did not understand at that time that conflict-of-interest disclosures would be required in such circumstances.

H. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 244.120(1)(c) with 1 equivalent action.

5. Terms of Settlement:

The parties agree as follows:

A. On August 14, 2026, the Commission considered information in the preliminary review phase of Case No. 26-363ESP and acted to find cause to initiate an investigation of this matter. Larry Magill has indicated that he wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the investigative phase.

B. In lieu of a civil penalty, Larry Magill will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Larry Magill within the scope of the above-referenced case.

D. Larry Magill will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

6. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

7. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Larry Magill agrees to waive his right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Larry Magill agrees to waive his right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:
Larry Magill
CD32228CE13E416...

October 27, 2026

Respondent: Larry Magill — Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON
GOVERNMENT ETHICS COMMISSION

In the Matter of:		
	David Chamberlain	
Case No.:	**26-366PDP**	**STIPULATED FINAL ORDER**
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against David Chamberlain.

2. Jurisdiction:

A. David Chamberlain is a Member of the Prineville Lake Acres Unit 1 Special Road District (PLA1SRD) Board of Directors (Board). As such, he is a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Public Meetings Ethics Law found in ORS Chapter 192.

B. On August 14, 2026, the Commission considered information in the preliminary review phase of Case No. 26-366PDP and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 192.640(1) states that the public body shall provide a public notice, “reasonably calculated to give actual notice to interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at

the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

B. ORS 192.670(3)(a) requires that meetings of a governing body provide the public, to the extent reasonably possible, "[a]ccess and attend the meeting by telephone, video or other electronic or virtual means."

C. ORS 192.705(1) provides that a "person who believes that a governing body has acted in violation of ORS 192.610 to 192.705 may, within 30 days of the alleged violation, file a written grievance with the public body whose governing body is alleged to have violated ORS 192.610 to 192.705, setting forth the specific facts and circumstances that the person asserts amounted to a violation of ORS 192.610 to 192.705[.]"

D. OAR 199-050-0040(1) clarifies that "Public notice, reasonably calculated to give actual notice, is required for all meetings of a governing body. The purpose of providing public notice is to give notice of the meeting details and subjects to members of the public at large, as well as to interested persons and media representatives who have requested notice."

E. OAR 199-050-0040(2)(b) provides the following methods for meeting the for interested parties notice requirement: Interested person lists, mailing lists, or other lists of persons or groups maintained by the governing body to provide notice or communications; Social media platforms normally utilized by the governing body for communications; or any other means reasonably calculated to provide actual notice to interested persons known to the governing body.

F. OAR 199-050-0040(2)(c) states that a governing body satisfies the

media notice requirement by providing notice to those media representatives who have requested notice, either in the method requested by the media representatives or by any other means reasonably calculated to provide actual notice to the media representatives.

G. OAR 199-050-0040(3)(a) requires that public meeting notices include the time, date, location of the meeting, and to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means.

H. OAR 199-050-0040(3)(c) requires that a meeting notice provide "[t]he name, telephone number, and email address of a person at the public body to contact to request an interpreter or other communication aids.

I. OAR 199-050-0040(4)(a) clarifies that the timing of regular meeting notice be "as much advance notice as reasonably possible, but no less than 48 hours advance notice."

J. OAR 199-050-0070 further elaborates on the grievance process by clarifying that the "public body's written response to the grievance shall be submitted to the person who made the grievance within 21 calendar days from the date the grievance was received by the public body and shall satisfy the other requirements in ORS 192.705(2)."

4. Stipulated Facts:

A. On March 8 and April 14, 2026, the PLA1SRD Board held two public meetings. Prior to convening the March 8th and April 14th meetings, the

PLASRD posted two separate public notices on Facebook and on a local community board.

i. When noticing the meetings via Facebook, the notices failed to provide the “principal subjects” anticipated to be discussed. Similarly, when noticing the meetings via the local community board, the notices failed to indicate the “place” where the meetings would be convened. Thus, Mr. Chamberlain violated ORS 192.640(1) and OAR 199-050-0040(1).

ii. Moreover, prior to and after noticing both meetings on Facebook and on the local community board, the PLA1SRD failed to provide proper notice to “interested persons” and “media representatives” as required by the Commission’s Administrative Rules. By failing to do so, Mr. Chamberlain violated OAR 199-050-0040(2)(b) and (c).

iii. Lastly, when noticing both meetings on Facebook and on the local community board, the PLA1SRD failed to provide information to the public on who to contact to request an interpreter or other communication aids. Therefore, Mr. Chamberlain violated OAR 199-050-0040(3)(c).

B. On March 23, 2026, PLASRD received a Public Meetings Law grievance. Accordingly, PLA1SRD had 21 days or until April 13, 2026, to provide a written response. On April 24, 2026, PLA1SRD received a second grievance alleging that PLA1SRD violated Public Meetings Law by failing to respond to the March 23, 2026 grievance. By failing to respond to the first grievance within the time period provided for in the statute, Mr. Chamberlain violated ORS 192.705 and OAR 199-050-0070.

5. Conclusion/Violation

A. David Chamberlain served as a Member at the March 23 and April 14, 2026, PLA1SRD meetings. As a PLA1SRD Board member, David Chamberlain was responsible for adherence to Public Meetings Law.

B. David Chamberlain violated one or more of the provisions found in ORS 192.640, ORS 192.670, ORS 192.705, OAR 199-040-040 and OAR 199-050-0070.

C. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of one or more of the provisions identified in paragraph 5(B).

6. Terms of Settlement:

The parties agree as follows:

A. David Chamberlain has indicated that he wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigation phase.

B. In lieu of a civil penalty, David Chamberlain will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against David Chamberlain within the scope of the above-referenced case.

D. David Chamberlain will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

7. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

8. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, David Chamberlain agrees to waive his right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, David Chamberlain agrees to waive his right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:
David Chamberlain
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October 29, 2026

Respondent: David Chamberlain — Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Derrick DeGroot**	
Case No.:	**26-515SCF**	**STIPULATED FINAL ORDER**
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Derrick DeGroot.

2. Jurisdiction:

A. At all relevant times, Derrick DeGroot was a Commissioner on the Klamath County Board of Commissioners. As such, Derrick DeGroot is a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law.

B. On October 9, 2026, the Commission considered the preliminary review report in Case No. 26-515SCF. The Commission voted to move the case to investigation to determine whether Derrick DeGroot violated Oregon Government Ethics Laws when completing his required Statements of Economic Interest (SEI) from 2022-2026.

3. Stipulated Facts:

A. Derrick DeGroot is a Commissioner on the Klamath County Board of Commissioners. Therefore, Derrick DeGroot was required by ORS 244.050 to

file an annual verified Statement of Economic Interest each year that he was on the Board of Klamath County Commissioners. He did timely file his SEIs.

B. The complaint in this case alleged that Derrick DeGroot failed to disclose his interest in D&S Properties and failed to list the real property owned by D&S Properties on his SEIs. Based on the information available, the preliminary review report found that Derrick DeGroot did not appear to have an ownership interest in D&S Properties, and he was not therefore required to list any properties owned by D&S Properties on his SEIs.

C. During the preliminary review, Commission staff discovered that Derrick DeGroot had not properly disclosed the sources of household income on his SEIs.

D. As an SEI filer, Derrick DeGroot is required by ORS 244.060(3) to provide the names, principal addresses, and brief descriptions of the sources of income received during the preceding calendar year that produced 10 percent or more of his total annual household income.

E. On his SEIs for 2023 and 2024, in section 2, Derrick DeGroot failed to disclose his income from serving as a Klamath County Commissioner, despite it making 10% or more of his household income.

F. Also, on his 2023, 2024, 2025, and 2026 SEIs, Derrick DeGroot disclosed Klamath County School District as a source of income. However, he failed to provide a business address for the Klamath County School District and failed to accurately identify this source as his spouse’s employment income.

G. The actions described in paragraphs 3(E) and 3(F) constitute one violation of ORS 244.060(3).

H. On August 24, 2026, Derrick DeGroot amended his 2023, 2024, 2025 and 2026 SEIs to correct the omissions identified in paragraphs 3(E) and 3(F) above.

4. Terms of Settlement:

The parties agree as follows:

A. On October 9, 2026, the Commission considered information in the preliminary review phase of Case No. 26-515SCF and acted to find cause to open an investigation on this matter.

B. Derrick DeGroot indicated that he wished to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigation phase.

C. As authorized by ORS 244.350(5), Derrick DeGroot will receive a letter of education in lieu of a civil penalty in order to settle and compromise this matter.

D. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted by the Commission in the above-referenced case against Derrick DeGroot.

E. Derrick DeGroot will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

5. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of

the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering into this agreement.

6. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Derrick DeGroot agrees to waive his right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Derrick DeGroot agrees to waive his right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:
Derrick DeGroot
1EF35C8CB001445...

Respondent: Derrick DeGroot — November 2, 2026
Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Brandi Velasquez**	**STIPULATED FINAL ORDER**
Case No.:	**26-525PDP**	
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Brandi Velasquez.

2. Jurisdiction:

A. Brandi Velasquez was a member of the Multnomah County (County) Community Health Center (Health Center) Board of Directors (Board) and is a member of the Board's Executive Committee. The County was a public body. The Health Center Board is a governing body of the County. The Executive Committee is an advisory body of the Health Center Board and is a governing body of a public body. As a member of a governing body, Brandi Velasquez was subject to Oregon Public Meetings Ethics Law found in ORS Chapter 192.

B. On September 11, 2026, the Commission considered information in the preliminary review phase of Case No. 26-525PDP and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 192.610 defines the following terms: convening, decision, deliberation and governing body.

B. ORS 192.630(1) requires that all meetings of a governing body of a public body be open to the public and all persons permitted to attend except as otherwise provided in Public Meetings Law.

C. ORS 192.630(2) provides that a "private meeting where a quorum of a governing body engages in discussions or communications that are part of the governing body's decision-making process on matters within the authority of the governing body violates the Public Meetings Law."

D. ORS 192.640(1) requires "[t]he governing body of a public body shall provide for and give public notice, reasonably calculated to give actual notice to interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects.

E. ORS 192.670(1) enumerates that "[a]ny meeting, including an executive session, of a governing body of a public body which is held through the use of telephone or other electronic communication shall be conducted in accordance with ORS 192.610 to 192.705."

F. ORS 192.670(3) further clarifies that "[w]hen telephone or other electronic means of communication is used and the meeting is not an

executive session, the governing body of the public body shall make available to the public at least one place where, or at least one electronic means by which, the public can listen to the communication at the time it occurs. A place provided may be a place where no member of the governing body of the public body is present."

G. OAR 199-050-0015(4) provides that a "private meeting where a quorum of a governing body engages in discussions or communications that are part of the governing body's decision-making process on matters within the authority of the governing body violates the Public Meetings Law."

4. Stipulated Facts:

A. On May 20, 2026, a quorum of the Executive Committee met in private to consider the probationary status and articles of impeachment of two Health Center Board members. As the purpose of the gathering constituted a "convening" of a "meeting" outside of the public view to consider topics within the jurisdiction of the Executive Committee, the members violated ORS 192.630(1).

B. Separately, by engaging in discussions or communications as a quorum, at a private meeting, on matters that are part of the governing body's decision-making process within the authority of the Executive Committee, the members violated ORS 192.630(2) and OAR 199-050-0015(4).

C. As the May 20 gathering qualified as a meeting, the Executive Committee members were also required to comply with the provisions in ORS 192.610 to ORS 192.705. By failing to satisfy the public notice requirements or make the gathering available to the public, the Members violated ORS 192.640(1).

D. Because the Executive Committee convened a meeting on May 20 through the use of telephone or other electronic communication, the members were required to make available one electronic means by which the public could listen at the time the public body was present. By failing to do so, the members violated ORS 192.670(1).

E. Brandi Velasquez asserts that she did not willfully or intentionally violate Oregon Public Meetings Law. Ms. Velasquez contends that prior to the May 20 meeting, she raised concerns regarding the Executive Committee publicly noticing its meetings. Because she did not agree with the nature of the discussions at the private gathering, Ms. Velasquez asserts that she left the meeting shortly after it began. Notwithstanding these assertions, Ms. Velasquez agrees to the terms and conditions in this Stipulated Final Order to resolve this matter and bring this case to a close.

5. Conclusion/Violation

A. Brandi Velasquez was serving as a member of the Executive Committee at its May 20, 2026, meeting. As an Executive Committee member, Ms. Velasquez was responsible for adherence to Public Meetings Law at the May 20 meeting. By failing to do so, however, Ms. Velasquez violated ORS 192.630(1) and (2), ORS 192.640(1) and ORS 192.670(1) as described in paragraphs 4(A) through (4)(D).

B. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation each of the provisions identified in paragraph 5(A).

6. Terms of Settlement:

The parties agree as follows:

A. Brandi Velasquez has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigation phase.

B. In lieu of a civil penalty, Brandi Velasquez will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Brandi Velasquez within the scope of the above-referenced case.

D. Brandi Velasquez will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

7. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

8. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Brandi Velasquez agrees to waive her right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This

order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Brandi Velasquez agrees to waive her right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

DocuSigned by:
E711923024194A4...

October 29, 2026

Respondent: Brandi Velasquez — Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:	**Lamar Wise**	**STIPULATED FINAL ORDER**
Case No.:	**26-534SDP**	
Date:	**November 13, 2026**	

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1. Purpose:

The purpose of this stipulated final order is to release, settle and compromise any and all claims, allegations, and charges that have been asserted by the Oregon Government Ethics Commission (Commission) in the above-referenced case against Lamar Wise.

2. Jurisdiction:

A. Lamar Wise is an elected State Representative for District 48. As such, he was a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law in ORS Chapter 244 at all times relevant to this review.

B. On October 9, 2026, the Commission considered the information in the preliminary review phase of Case No. 26-534SDP and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 244.050(1)(a) requires members of the state legislature, such as Mr. Wise, to file an annual statement of economic interest (SEI) with the Commission.

B. ORS 244.060(8) requires filers to list the “name, principal address and brief description of each source of income exceeding an aggregate amount of $1,000, whether or not taxable, received by the public official or candidate, or a member of the household of the public official or candidate, during the preceding calendar year, if the source of that income is derived from an individual or business that has a legislative or administrative interest or that has been doing business, does business or could reasonably be expected to do business with the governmental agency of which the public official holds, or the candidate if elected would hold, an official position or over which the public official exercises, or the candidate if elected would exercise, any authority.”

C. ORS 244.020(10)(1) defines “legislative or administrative interest” to include an economic interest, distinct from that of the general public in any matter subject to the decision or vote of the public official acting in the public official’s official capacity.”

D. ORS 244.090(1) requires a “public official or candidate required to file a statement of economic interest under this chapter shall include on the statement the name of any compensated lobbyist who, during the preceding calendar year, was associated with a business with which the public official or candidate or a member of the household of the public official or candidate was also associated.”

4. Stipulated Facts:

A. On January 3, 2025, Mr. Wise received a stipend from Seeding Justice, a domestic non-profit entity registered to do business in Oregon. In November 2025, Mr. Wise was appointed to the position of Representative with the state legislature.

B. When Mr. Wise timely filed his 2026 SEI, he did not identify any persons or entities under Question 7. As Mr. Wise is a state legislator and Seeding Justice is an entity registered to do business in Oregon, Seeding Justice has a legislative or administrative interest in his work as a public official. [ORS 244.020(10)(a)].

C. Because the income received from Seeding Justice in 2025 was more than $1,000, Mr. Wise was required to list the entity on his 2026 SEI. By failing to do so, Mr. Wise violated ORS 244.060(8).

D. Additionally, in section 2 of his SEI, Mr. Wise identified Oregon AFSCME as a source of income. [ORS 244.060(3)]. Oregon AFSCME is a business and a business with which Lamar Wise is associated. In 2025, Oregon AFSCME had active lobbyists and thus, he was required to list their names in Section 6 of his 2026 SEI. [ORS 244.090(1)].

E. Mr. Wise amended his 2026 SEI to correct his omission of Seeding Justice as a source of income with a legislative or administrative interest in his role as a legislator. He also listed the lobbyists associated with Oregon AFSCME.

F. Lamar Wise asserts that he did not willfully or intentionally violate provisions in Government Ethics Law. Mr. Wise asserts that once he was made aware of his SEI errors, he worked directly with Commission staff to make the necessary corrections, as required by law. Notwithstanding these assertions, Mr. Wise agrees to the terms and conditions of this Stipulated Final Order to resolve the matter and bring this case to a close.

5. Conclusion/Violation

A. The actions described in paragraph 4(C) constitute one violation of ORS 244.060(8). When receiving income in excess of $1,000 from Seeding

Justice, an entity which is registered to do business in Oregon and has a legislative or administrative interest in his role as a state legislator, Mr. Wise was required by statute to identify Seeding Justice in Question 7 of his SEI. By failing to do so, Mr. Wise ORS 244.060(8).

B. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 244.060(8).

6. Terms of Settlement:

The parties agree as follows:

A. Lamar Wise has indicated that he wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigation phase.

B. In lieu of a civil penalty, Lamar Wise will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.

C. The Commission releases, settles and compromises any and all claims, allegations and charges that have been or could be asserted against Lamar Wise within the scope of the above-referenced case.

D. Lamar Wise will initiate no claims, litigation, or other action against the Commission as a result of these proceedings.

7. Review by Counsel:

All of the parties hereto acknowledge that this agreement has been entered into by their own free will and with full understanding of the contents herein. Each of

the parties further acknowledges that each has had the opportunity to seek the advice of counsel in reviewing and entering this agreement.

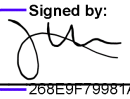
8. Effect:

This agreement is subject to the final approval of the Commission. Once approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Lamar Wise agrees to waive his right to a contested case hearing as provided in ORS Chapter 183 and ORS 244.370. This order shall be the final order and all information in the Commission files on this matter shall become part of the record.

By signing this agreement, Lamar Wise agrees to waive his right to obtain judicial review of this order as provided in ORS 183.482

IN WITNESS WHEREOF, the parties have entered into and signed this stipulated final order on the dates set forth below.

Signed by:

268E9F79981A4E0...

Respondent: Lamar Wise — October 30, 2026
Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of:

Jim Parks

Case No.: **26-122EJS**

Date: **November 3, 2026**

INVESTIGATION REPORT

Recommendation: Move to make preliminary findings of violation of ORS 244.040(1) and ORS 244.120(2)

Synopsis

Jim Parks is Chairman on the Board of Directors (Board) for the Blue River Water District (BRWD). The complaint in this case was submitted by Tony Casad on March 12, 2026. The complaint alleges that Jim Parks may have violated provisions of Oregon Government Ethics Law by using his official position for personal gain.

At its June 12, 2026 meeting, the Commission considered the information presented in the preliminary review report and found cause to open an investigation related to the allegations that Jim Parks may have violated ORS 244.040(1) and ORS 244.120(2). In investigation, Commission staff examined the minutes and recordings of BRWD meetings, responses to the complaint provided by Jim Parks, another BRWD Board member's statement, the BRWD budget, the BRWD Treasurer's Reports, and the BRWD website.

The available information indicates that Jim Parks was met with a conflict of interest when he introduced a proposal to act as the interim superintendent for the BRWD and voted to appoint himself to the paid position at the Board's meeting on December 11, 2024. The information also indicates that Jim Parks was met with conflicts of interest when he participated in the Board's approval of the BRWD's monthly Treasurer's Reports which

included his monthly salary and reimbursements, and when he voted to approve the BRWD's 2025-26 fiscal year budget which included funds for his own salary.

The available information also indicates that Jim Parks violated ORS 244.040(1) by using his official position to obtain a financial benefit that would not have been available except for his official position when he took actions to remove the previous superintendent and appoint himself as the paid interim superintendent on December 11, 2024.

Thus, the information gathered is sufficient to make a preliminary finding that Jim Parks violated ORS 244.040(1) and ORS 244.120(2)

Relevant Statutes and Administrative Rules

The following Oregon Revised Statutes are applicable to the issues addressed in this report:

ORS 244.020 Definitions

(1) Actual conflict of interest. "Actual conflict of interest" means any action or any decision or recommendation by a person acting in a capacity as a public official, the effect of which would be to the private pecuniary benefit or detriment of the person or a relative or member of the household of the person, or any business with which the person or a relative or member of the household of the person is associated * * *

* * * * *

(13) Potential Conflict of Interest. (13) "Potential conflict of interest" any action or any decision or recommendation by a person acting in a capacity as a public official, the effect of which could be to the private pecuniary benefit or detriment of the person or a relative or member of the household of the person, or a business with which the person or the relative or member of the household of the person is associated * * *

* * * * *

ORS 244.040 Prohibited use of official position or office; exceptions; other prohibited actions. (1) Except as provided in subsection (2) of this section, a public official may not use or attempt to use official position or office to obtain financial gain or avoidance of financial detriment for the public official, a relative or member of the household of the public official, or any business with which the public official or a relative or member of the household of the public official is associated, if the financial gain or avoidance of financial detriment would not otherwise be available but for the public official's holding of the official position or office.

* * * * *

ORS 244.120 Methods of handling conflicts; Legislative Assembly; judges; appointed officials; other elected officials or members of boards. (1) Except as provided in subsection (2) of this section, when met with an actual or potential conflict of interest, a public official shall: * * * * *

(a) When met with a potential conflict of interest, announce publicly the nature of the potential conflict prior to taking any action thereon in the capacity of a public official; or

(b) When met with an actual conflict of interest, announce publicly the nature of the actual conflict and:

(A) Except as provided in subparagraph (B) of this paragraph, refrain from participating as a public official in any discussion or debate on the issue out of which the actual conflict arises or from voting on the issue.

(B) If any public official's vote is necessary to meet a requirement of a minimum number of votes to take official action, be eligible to vote, but not to participate as a public official in any discussion or debate on the issue out of which the actual conflict arises.

* * * * *

Investigation

On March 12, 2026, the Oregon Government Ethics Commission (Commission) initiated a preliminary review based on information in a signed complaint from Tony Casad. The complaint alleges that Jim Parks, Chairman on the Board for the BWRD, may have used his official position for personal gain in violation of Oregon Government Ethics Law. The complaint states that Jim Parks appointed himself to a paid superintendent position at a Board meeting on December 11, 2024. It states that Jim Parks motioned to terminate the sitting superintendent, Tony Casad, and then volunteered to fill the position, himself, on an interim basis. The complaint states that following his appointment, the Board has made no effort to advertise, recruit, or hire a permanent superintendent. (#PR1).

At its June 12, 2026 meeting, the Commission considered the information presented in the preliminary review report and found cause to open an investigation. (#IR1, #IR2). The focus of the investigation was to determine whether there was sufficient evidence to indicate whether Jim Parks may have violated ORS 244.040(1) and ORS 244.120(2) by nominating and appointing himself to replace the previous superintendent, and by reviewing and approving funds which included his own salary and reimbursements.

The complaint in this case also alleged that Jim Parks advocated for increasing the superintendent salary while acting as Board Chairman, and that he connected his private irrigation system to a BRWD fire hydrant for personal use. The Commission examined these two allegations in preliminary review, but the Commission did not find cause to conduct an investigation on these two matters. (#PR1, #IR1, #IR2).

December 11, 2024 Board Meeting

Commission staff reviewed the recording of the BRWD Board's meeting on December 11, 2024. The first item considered by the Board was the "review of the Board letter regarding the contract of the superintendent." Melanie Stanley, Board member at the time, stated

that the letter had been distributed to the Board members for their review, and they needed to decide whether they should terminate the superintendent contract with Tony Casad. Jim Parks stated that they discussed the matter with their legal counsel, and they verified that the termination date would be effective on the day that the Board makes their decision. Jim Parks made a motion and voted to approve the termination letter. The motion passed unanimously. (#PR3).

Later in the meeting, Jim Parks introduced a proposal to act as the interim superintendent. Jim Parks voted to appoint himself to the interim superintendent position. After he voted affirmatively, he asked Melanie Stanley, “I guess I can vote?” Melanie Stanley told him that he should abstain because he could not vote on his own position. She stated that two votes were more than enough votes. The Board did not redo the vote. Later, Jim Parks stated that he had “superintendent business” to discuss, and he explained that some of the BRWD’s locks needed to be replaced. (#PR3).

February 21, 2025 Board Meeting

The minutes for the Board’s meeting on February 21, 2025 state that Jim Parks indicated that the Board “needs to add $45.00 to reimbursements for the OHA payment he made.” One of the items on the Treasurer’s Report was a $45 payment to Jim Parks for the OHA payment. Jim Parks seconded a motion and voted in favor of paying the BRWD’s invoices. The minutes do not indicate that Jim Parks declared a conflict of interest. (#IR5).

June 18, 2025 Board Meeting

The minutes for the Board’s meeting on June 18, 2025 indicate that the Board considered the adoption of the BRWD’s budget for the 2025-26 fiscal year. The minutes indicate that the Board voted unanimously to adopt the budget. The minutes do not indicate that the Board discussed increasing the salary for the superintendent position during the June 18th Board meeting. (#PR8, #IR8).

January 15, 2026 Board Meeting

The minutes of the Board's January 15, 2026 meeting indicate that the Board had a discussion about paying outstanding balances on past due accounts. The minutes indicate that the Board voted unanimously in favor of approving the January 7, 2026 Treasurer's Report and paying all outstanding bills. (#PR5, #PR6).

The minutes also indicate that the Board had a discussion about Board member roles. The minutes state that the superintendent is a contracted employee, not a BRWD employee. The minutes state that the BRWD had an employee for a very short period, but the last time they had an employee was in July of 2019. (#PR6).

Treasurer's Reports

Commission staff reviewed the Treasurer's Report, available on the BRWD's website, dated January 7, 2026. On the Treasurer's Report, under "Accounts Payable / Bills" there was an expense titled "Superintendent" with an amount of $2,702.64. The Treasurer's Report included the following suggested motion for the Board: "I move to approve the Treasurer's Report as presented, including the payment of bills and acknowledgement of the water sales credit." The Board unanimously approved the Treasurer's Report. (#PR5, #PR6).

The "Treasurer's Report for Board Meeting - Feb 4. 2026 (amended)" listed the BRWD accounts, balances, and total funds available. The Treasurer's Report lists the "regular" district expense "J. Parks" with an amount of $2,702.64. The minutes for the Board's meeting on February 4, 2026 indicate that the Board, including Jim Parks, "reviewed" the Treasurer's Report. (#IR6, #IR7).

Shannon Goodpasture-Lehr Phone Call

On March 17, 2026, Shannon Goodpasture-Lehr, BRWD Board member and secretary, called Commission staff to provide additional information related to the complaint. Shannon Goodpasture-Lehr explained that she could not recall an instance where the

Board discussed the pay, or a pay increase, for the superintendent position. She stated that she believes the superintendent pay is the same as it was when Tony Casad, the previous superintendent, was in the position. She stated that the superintendent pay was determined prior to her time on the Board. (#PR4)

Shannon Goodpasture-Lehr explained that the superintendent receives a base pay as well as reimbursements for purchases made for equipment and supplies. She explained that the BRWD has limited staff, and the superintendent may purchase supplies such as paper or tools that are needed throughout the month. She stated that the base pay and reimbursements are combined and paid to the superintendent monthly, and the BRWD treasurer processes the checks. She stated that the superintendent's checks are included in the monthly Treasurer's Reports that are approved by the Board at their meetings. (#PR4).

Shannon Goodpasture-Lehr confirmed that the BRWD does not currently have bylaws or a charter. She stated that the Board is working on developing bylaws and policies to be implemented. She also stated that she is not aware of a policy or an employment contract for the superintendent position. (#PR4).

Jim Parks Phone Calls

On March 18, 2026, Commission staff spoke with Jim Parks on the phone. Jim Parks stated that he was being paid a monthly flat rate of $2,400 for working as the BRWD superintendent. He stated that the superintendent pay has not changed since June or July of 2021 when the Board last discussed raising the salary. (#PR7).

Jim Parks explained that he served as the BRWD superintendent on a couple occasions. He said he was the superintendent for about six months in 2022 and for about six months in 2023. Jim Parks also provided additional information about his fire hydrant usage during the Lookout Fire in August 2023. (#PR7). As noted above, following the preliminary review in this case, the Commission did not find cause to investigate whether Jim Parks violated

Government Ethics Law by taking actions to increase his own superintendent pay or by using a BRWD fire hydrant in 2023. (#IR1, #IR2).

On September 30, 2026 Commission staff again spoke with Jim Parks on the phone. Jim Parks explained that he offered to serve as the superintendent because it is important to him that the job gets done. He explained that it is hard to find someone who is willing to do the work for $14 per hour. Jim Parks stated that he did not intentionally violate the ethics laws when he took action to fill the position at the Board's meeting on December 11, 2026 Board meeting. He stated that he did not fully know the correct Board procedure, and during the meeting, he requested that another Board member give him direction. (#IR3, #IR4).

Conclusions

During the relevant period, Jim Parks was the Chairman on the Board of Directors for the Blue River Water District, and he has served on the Board since December 2024. As such, Jim Parks was a public official at all times relevant to this investigation, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law.

Use of Office

ORS 244.040(1) prohibits public officials from using or attempting to use their official position or office to obtain a financial benefit or avoid a financial detriment for themselves, their relatives or household members, or any businesses with which they, their relatives or household members are associated, if the financial gain or avoidance of financial detriment would not have been available but for holding the public position. [ORS 244.040(8)].

The first allegation in the complaint alleges that Jim Parks may have used his position on the Board to appoint himself as the BRWD's paid superintendent on December 11, 2024. The recording of the December 11 Board meeting indicates that after Jim Parks made a motion and voted to terminate the previous superintendent (and complainant in this case)

Tony Casad, he introduced a proposal to act as the interim superintendent, himself. After he voted to appoint himself as the interim superintendent, he asked, “I guess I can vote?” Board Member Melanie Stanley told him that he should abstain because he could not vote on his own position, but the Board did not redo the vote. The BRWD superintendent is a contractor position that pays at least $2,400 per month. By nominating himself to become the interim superintendent and voting to appoint himself to the position, Jim Parks used his official position to provide himself with a financial benefit that would not have been otherwise available. Although Melanie Stanley stated that the other Board members’ votes were enough to pass the motion to appoint Jim Parks as interim superintendent, Jim Parks would not have become the interim superintendent except for his official actions to nominate himself for the position. The actions taken to replace the superintendent all occurred during the December 11th meeting, without any other recruitment or hiring process, and the BRWD does not have bylaws or policies establishing the superintendent appointment process.

The information available indicates that Jim Parks violated ORS 244.040(1) by using his official position to obtain a financial gain that would not have been available except for his official position when he nominated himself to act as the interim superintendent and voted to appoint himself to the paid position.

Conflict of Interest

A conflict of interest means any action, decision, or recommendation by a person acting in their capacity as a public official, the effect of which would be (actual conflict of interest) or could be (potential conflict of interest) to the private financial benefit or detriment of the person, their relative, their household member or a business with which they, their relative, or their household member are associated. [ORS 244.020(1) and ORS 244.020(13)].

When met with a conflict of interest, an appointed public official serving on a board or commission, such as Jim Parks, must make a public announcement of the nature of the conflict of interest. If met with a potential conflict of interest, this announcement must be

made prior to taking any action on the matter in the capacity of a public official. If met with an actual conflict of interest, the public official must make the public announcement and then refrain from participating as a public official in any discussion, debate or vote on the matter out of which the actual conflict of interest arises, unless their vote is necessary to meet a minimum vote requirement, in which case the public official may vote but may not participate in any discussion or debate on the matter. [ORS 244.120(2)].

As noted above, Jim Parks was serving as a Board member when he introduced a proposal to act as the interim superintendent and voted to appoint himself to the paid position at the Board's December 11, 2024 meeting. Although he asked the Board whether he was allowed to vote after he had already voted, Jim Parks did not publicly announce his conflict of interest, nor did he refrain from participating in the matter in his official capacity. Jim Parks informed Commission staff that he was unaware of his conflict of interest disclosure requirements.

The information available also indicates that the Board reviews and approves Treasurer's Reports at their monthly meetings. The Treasurer's Reports include the superintendent's salary and reimbursement payments. After being appointed as the BRWD superintendent, Jim Parks participated in the Board's approval of the Treasury Reports which included payments to himself. Thus, Jim Parks was met with actual conflicts of interest. The information provided does not indicate that Jim Parks publicly announced his conflicts of interest prior to reviewing, making motions, and voting on the Treasurer's Reports.

The information available also indicates that Jim Parks seconded a motion and voted to approve the BRWD's 2025-26 fiscal year budget during a Board meeting on June 18, 2025. The BRWD budget included funds for the superintendent's salary and reimbursements. Because Jim Parks served as the paid interim superintendent, he was met with an actual conflict of interest when he participated in the Board's approval of the annual budget. This budget adoption occurred prior to the passage of Senate Bill 983 by the Oregon Legislature, and before the conflict of interest exception for the adoption of

local budgets, ORS 244.120(2)(b)(C), was added to ORS Chapter 244. Jim Parks did not publicly announce his conflict of interest prior to making recommendations and voting to adopt the budget.

The information obtained in this investigation indicates that Jim Parks was met with actual conflicts of interest when he participated in the Board actions to appoint himself to the paid interim superintendent position on December 11, 2024, when he voted to approve monthly Treasurer's Reports which included his own salary, and when he voted to approve the BRWD's 2025-26 fiscal year budget. Because Jim Parks did not publicly announce his conflicts of interest, and because he did not refrain from acting on the matters in his official capacity, he violated ORS 244.120(2).

Recommendations:

The Oregon Government Ethics Commission should make a preliminary finding that Jim Parks violated ORS 244.040(1) and ORS 244.120(2). The Commission should further order that the case be moved to a contested case proceeding or that a negotiated settlement be entered. [Motion 10].

Associated Documents:

#PR1 Original Complaint submitted 3/12/2026
#PR2 Open PR Letter sent 3/13/2026
#PR3 Memo of Board Meeting Recording on 12/11/2024
#PR4 Memo of Phone Call with Shannon Goodpasture-Lehr on 3/17/2026
#PR5 Treasurers Report for 1/7/2026
#PR6 Board Meeting Minutes for 1/15/2026
#PR7 Memo of Phone Call with Jim Parks on 3/18/2026
#PR8 Board Meeting Minutes for 6/18/2025
#IR1 26-122EJS Jim Parks PR dated 5/8/2026
#IR2 OGEC Meeting Materials Accessed 10/26/2026
#IR3 Jim Parks Phone Call on 9/30/2026

Case No. 26-122EJS - Page 12

Parks Investigation

1 #IR4 BRWD Website Accessed 10/26/2026

2 #IR5 Minutes of BRWD Meeting on 2/21/2025

3 #IR6 Treasurers Report for 2/4/2026

4 #IR7 Minutes of BRWD Meeting on 2/4/2026

5 #IR8 BRWD Budget Accessed 10/28/2026

Prepared By: Joshua Sullivan 11/3/2026

Joshua J. Sullivan Date

Investigator

Approved By: Susan V. Myers 11/3/2026

Susan V. Myers Date

Executive Director

Reviewed By: Dan Gilbert 11/3/2026

Daniel R. Gilbert Date

Senior Assistant Attorney General

Oregon
Tina Kotek, Governor

Government Ethics Commission
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Salem, OR 97302-1680
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October 12, 2026

Sent via email

Linda Nishioka
Salem City Council
555 Liberty Street SE, Room 225
Salem, OR 97301

Re: Advice No. 26-624I

Dear Linda Nishioka,

This letter of advice is provided in response to your request received on September 9, 2026, and additional information provided by Salem City Attorney Dan Atchison. The following analysis and advice is offered under the authority provided in ORS 244.284 as guidance on how the current provisions of Oregon Government Ethics Law may apply to the specific circumstances you have presented.

Information Provided and Advice Request

The information provided indicates that the City of Salem (City) is considering land use amendments related to short-term rentals (STRs), accessory short-term rentals (ASTRs), and unlicensed short-term rentals (collectively referred to as short-term rentals), such as Airbnb vacation rentals.

The City Council received a report from City staff on August 24, 2026 about the City's short term rental plan. As of late July, the City had 41 licensed ASTRs, 33 licensed STRs, and 101 unlicensed short-term rentals. The report states that the City has enhanced their monitoring and education software, resulting in increased licensing compliance, though many unlicensed rentals remain. The report proposes implementing an Administrative Conditional Use Permit (ACUP), with an approximate cost of $2,000, as an alternative to the currently available conditional use permit that costs approximately $7,000. The staff report

includes several recommendations about the locations and zones where short-term rentals could be allowed and the types of lots where short-term rentals could be permitted. The City is preparing amendments to the City's land use regulations to address multiple housing concerns. The proposed amendments to the Salem Revised Code may expand or restrict the allowed uses for short-term rentals. The proposed amendments will first be reviewed by the Planning Commission, and then by the City Council.

You, as well as some other members of the City Council and Planning Commission, own and operate rental properties within the City, as do relatives and household members of City officials. You explain that although you have ownership interest in several rental properties, none are short-term rentals, nor have they operated as such. You explain that you do not intend to convert any of your rental units into short-term rentals, and it is unlikely that the property management company associated with the apartment rentals plans to convert them into short-term rentals. We have no information regarding whether other City officials' rentals would be considered short-term rentals.

The proposed amendments that will be considered by the Planning Commission and City Council have not been drafted yet, but the information provided indicates that they would likely include the recommendations found in the informational report presented by City staff on August 24, 2026. You indicated that it is "very unlikely" that any of the recommendations proposed in the report could affect you, your rentals, your relatives, your household members, or a business with which you are associated. You asked for advice about whether you would be met with an actual or potential conflict of interest related to the proposed amendments impacting short-term rentals, and you asked whether the class exception set forth in ORS 244.020(13)(b) would apply.

Statutes

ORS 244.020(1) states that an actual conflict of interest means "any action or any decision or recommendation by a person acting in a capacity as a public official, the effect of which would be to the private pecuniary benefit or detriment of the person or a relative or member

of the household of the person, or any business with which the person or a relative or member of the household of the person is associated, unless the pecuniary benefit or detriment arises out of circumstances described in subsection (13) of this section."

ORS 244.020(13) states that a potential conflict of interest means "any action or any decision or recommendation by a person acting in a capacity as a public official, the effect of which could be to the private pecuniary benefit or detriment of the person or a relative or member of the household of the person, or a business with which the person or the relative or member of the household of the person is associated * * *."

When met with a conflict of interest, an elected public official, or an appointed public official serving on a board or commission, such as a City Council or Planning Commission member, must make a public announcement of the nature of their conflict of interest. If it is a potential conflict of interest, this announcement must be made prior to taking any action on the matter. If it is an actual conflict of interest, the public official must make the public announcement and then refrain from participating as a public official in any discussion, debate or vote on the matter out of which the actual conflict of interest arises, unless their vote is necessary to meet a minimum vote requirement, in which case the public official may vote but may not participate in any discussion or debate on the matter. [ORS 244.120(2)].

The class exception in ORS 244.020(13)(b) provides that no conflict of interest exists if the public official is making a decision or recommendation or taking action and that decision, recommendation, or action "would affect to the same degree a class consisting of all inhabitants of the state, or a smaller class consisting of an industry, occupation or other group" that the person, or their relative, household member, or businesses with which they are associated, is a member or is engaged. For the Oregon Government Ethics Commission to make a determination that the class exception applies in a particular situation, they would first need to determine the scope of the class and who is included in it, and then they would need to determine whether all members of that class would be affected to the same degree by the decision, recommendation, or action being taken.

Analysis

In order to determine whether you would be met with either a potential or actual conflict of interest, we first need to examine the action, decision, or recommendation being taken in your official capacity, to see if it would or could result in a financial benefit or detriment to you, your relative, your household member, or a business with which you are associated. In this case, that is somewhat difficult because the amendments that will be proposed for consideration have not been drafted yet. Based on the information provided, it appears the proposed amendments may include, but not necessarily be limited to, the recommendations described in the informational report presented by City staff on August 24, 2026. Those recommendations proposed having an ACUP fee of $2,000 as an alternative to the current conditional use permit fee of $7,000. It also makes recommendations about locations, zones, and types of lots where short term rentals could be allowed.

If the amendments being proposed are limited to the recommendations in the informational report and only affect the three types of short-term rentals described, STRs, ASTRs, and unlicensed short-term rentals, it does not appear that you would be met with either a potential or actual conflict of interest because the amendments could have no financial effect on you, your relative, your household member, or a business with which you, or your relative or your household member, are associated.

You indicated that you have not, do not currently, and have no intentions to operate short-term rentals within the City. Based on this assertion, and assuming the amendments will be limited to the recommendations in the informational report, it does not appear that the proposed amendments would have a certain financial effect on you, your relative, your household member, or a business with which you are associated. Thus, you would not be met with an actual conflict of interest.

If the effect of the proposed amendments could result in a financial benefit or detriment to you, as an owner of property rentals within the City, you would be met with a potential conflict of interest, requiring you to make a public announcement disclosing the nature of

your conflict of interest before proceeding on the matter. Whether there could be the possibility of a financial effect resulting from the proposed amendments will depend on determining what the possible financial impacts of the proposed amendments might be and then determining how those possible financial impacts might affect you or your rental properties. Again, based solely on the information and assertions you have made, it does not appear that you would be met with a potential conflict of interest, but that determination might change depending on the actual language of the proposed amendments.

In the interests of transparency and to avoid the appearance of a conflict of interest, you could make a public announcement of a potential conflict of interest, particularly since once the disclosure is made you may continue to participate in any deliberations or decisions on the matters being considered. Alternatively, you could also simply announce that you do not have a potential conflict of interest but you want to disclose that you own rental properties but they are not currently nor do you intend for them to become short term rentals.

Class Exception

Although it appears that the amendments likely to be considered would include the proposed changes related to short-term rentals described in the informational report, the extent of the amendment proposals remains uncertain at this point. That makes it impossible to determine whether the class exception in ORS 244.020(13)(b) could apply.

In order to make a class exception determination, the Commission would first need to evaluate the content of the amendments to determine the scope of the class – specifically, who the potential class members would be. For example, would it only be owners of existing short term rental properties? Would it be all residential property owners? Or only those who own more than one property?

Once the Commission makes a determination as to the scope of the class, it would need to examine the financial impacts of the proposed amendments to determine whether the specific public officials at issue would be affected to the same degree as all of the other

members of the class. Sufficient information necessary to make such a class exception determination is unavailable at this time. At some point in the future, if you would like to request a class exception determination after the amendments have been drafted, please contact our office to discuss the issuance of a Commission Advisory Opinion.

The conflict of interest analysis presented in this letter of advice is based on the facts and circumstances of your specific circumstances. Other City officials may be met with other conflicts of interest not addressed here, and their situations may differ significantly from the circumstances examined here. Every public official is individually responsible for identifying and disclosing their own conflicts of interest as described in ORS 244.120. If any of the other City officials would like assistance determining whether they might be met with conflicts of interest as the City Council and Planning Commission consider the proposed amendments, please encourage them to reach out to us.

Thank you again for contacting the Commission with your inquiry. If you have any additional questions or need further clarification, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

*****DISCLAIMER*****

This staff advice is provided under the authority given in ORS 244.284(1). This advice offers guidance on how Oregon Government Ethics law may apply to the specific facts described in your request. This advice is based on my understanding and analysis of the specific circumstances you described and should not be applied to circumstances that differ from those discussed in this request.

Oregon
Tina Kotek, Governor

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October 5, 2026

Sent via email

Gary Sincick
garysincick@gmail.com

Re: Advice No. 26-652I

Dear Gary Sincick:

This letter of advice is provided in response to your request received on September 3, 2026, for guidance as to the application of Oregon Government Ethics law in ORS Chapter 244 with regard to owning a company that does business with the State of Oregon.

You indicate you are a Lead Software Developer at the Oregon Employment Department (OED) and are also an employee and part owner of RM Wilson Consulting (the Company). The Company licenses AutoCoder software (the software) to the State of Oregon, along with eight other states and private customers. OED currently uses the software to assign Standard Occupational Classification (SOC) and Occupational Information Network (O*NET) codes to job postings. In your role as Lead Software Developer, you are responsible for installing the software and answering questions about it for other developers. The software has been in use at OED for over two decades, and you may only work with it once every two years. Further, you do not provide recommendations for when it should be used, nor do you participate in any purchasing or procurement roles within your agency.

In your request, you state that the Company will be dissolved following the retirement of its owner, RM Wilson, on December 31, 2026. You are proposing to acquire the software, source code, intellectual property, domains, and cloud infrastructure by written assignment from the Company and continue its operations, including with OED and the

State of Oregon, under an LLC you have formed. You state that Oregon would receive maintenance, updates, and support free of charge under a zero-dollar agreement with your LLC, and that work would take place outside of your hours with OED and use no state resources.

Relevant statutes and definitions

Business -- ORS 244.020(2) defines a "business" as "any corporation, partnership, proprietorship, firm, enterprise, franchise, association, organization, self-employed individual and any other legal entity operated for economic gain but excluding any income-producing not-for-profit corporation that is tax exempt under section 501(c) of the Internal Revenue COED with which a public official or a relative or member of the household of the public official is associated only as a member or board director or in a nonremunerative capacity."

Associated Business -- ORS 244.020(3)(a) defines a "business with which the person is associated" as including any private business or closely held corporation with which the public official or the public official's relative or household member are a director, officer, owner, employee, or agent, or one in which they currently hold, or held within the past calendar year, stock, stock options, equity interest or debt instruments worth $1,000 or more.

Conflict of Interest -- ORS 244.020(1) and (13) provide that a public official is met with a conflict of interest, actual or potential, whenever they participate, in their official capacity, in making a decision or recommendation, or taking action, the result of which would be (actual conflict of interest) or could be (potential conflict of interest) to the financial benefit or detriment of the public official, their relative, their household member, or any business with which they, their relative, or their household member is associated.

If met with a conflict of interest, an agency employee, such as yourself, is required to submit a written disclosure to their appointing authority (your supervisor) describing the

nature of the conflict of interest and requesting that the appointing authority dispose of the matter giving rise to the conflict, by either assigning the matter to another employee or by directing the conflicted employee on how to handle the matter. [ORS 244.120(1)(c)].

Prohibited Use of Office -- ORS 244.040(1) prohibits public officials from using or attempting to use their position to obtain a financial gain or avoid a financial detriment, for themselves, their relatives or household members, or any businesses with which they are associated, if that financial gain or avoidance of detriment would not otherwise be available but for them holding their official position.

A public official who seeks private employment or private financial opportunities must consider whether they have taken any action in their position as a public official to create the employment opportunity or private financial opportunity, or if they used their position as a public official to gain any additional compensation or benefits. Other factors to consider include whether the opportunity would have been available to that public official if they didn't hold their current position, whether the employment position or private financial opportunity was competitively attained, and whether the selection was based on merit. In essence, a public official must not use or attempt to use their official position to obtain private employment or create a private financial opportunity for themselves, a relative, a member of their household or a business with which any of them are associated that would not otherwise be available but for their position as a public official.

Confidential Information -- Another statute relevant to your inquiry is ORS 244.040(4) which states that "[a] public official may not attempt to further or further the personal gain of the public official through the use of confidential information gained in the course of or by reason of holding position as a public official or activities of the public official." "Confidential information" means any record that is exempt from public disclosure or inspection under state law, or any information obtained in the course of or by reason of

holding position as a public official that is not publicly disclosed. The record or information is no longer confidential if it has been voluntarily disclosed by the public body, or been disclosed through a public records disclosure order or court order. [OAR 199-008-0005(5)].

Analysis and Answers

Applying these laws to the scenario you have described, we would first note that both the Company and the LLC you formed appear to meet the definition of a business under ORS 244.020(2). Additionally, because you are an employee and owner of the Company, and the owner of the LLC, both would qualify as businesses with which you are associated. This is important because if they are associated businesses, then we would have to take them into consideration when determining whether a conflict of interest or prohibited use of office exists.

For a conflict of interest, we would look at whether you are making a decision, a recommendation or taking an action in your official capacity as an OED employee (official action), and if that official action would or could have a financial benefit or detriment (financial impact) on you, a relative or household member, or an associated business. So to determine if a conflict of interest exists, the question under consideration would be whether you, in your role as a software developer at OED, are taking any official actions that would or could have a financial impact on you, the Company, or your LLC.

Similarly, when we consider prohibited use of office, we would look at whether you are using or attempting to use your position at OED to obtain a financial gain or avoid a financial detriment for yourself, your relatives or household members, or any businesses with which you are associated, and if that financial gain or avoidance of detriment would not otherwise be available but for the holding of your official position. Thus, to determine if you are engaging in a prohibited use of position, the question would be whether you

are using or attempting to use your official position at OED to obtain financial gain or avoid financial detriment for yourself, the Company, or your LLC.

You indicate that you do not serve in any purchasing or procurement roles at OED, meaning you would not be in a position to award a contract to the Company or your LLC or to make any recommendations for OED to license the software from your LLC. You also indicate that the software has been used at OED for over two decades. You state that you do not make any recommendations for when the software should be used; however, you do indicate that you are responsible for installing the software and answering questions about it for other developers.

Based on this information, it is possible that as an OED employee you may not be making any decisions or recommendations, or taking any actions that could or would have a financial impact on the Company or your LLC. Whether that is, in fact, the case, will always depend on exactly what you do in your role at OED. For example, could answering questions about the software for other developers lead to an expansion of the software's use? Would installing the software in additional areas at OED result in higher license fees paid to the Company? If your actions could or would result in any financial impact on the Company or your LLC, then you may be met with a conflict of interest, requiring you to disclose that conflict to your appointing authority.

It would be a similar analysis for the prohibited use of position. You would need to consider whether any of your actions at OED are taken for the purpose of allowing the Company or your LLC to obtain a financial gain or avoid a financial detriment that would not otherwise be available to it. Please note that there is no way to disclose a prohibited use of position and then continue. If your actions would be prohibited under ORS 244.040, then proceeding with those actions would constitute a violation.

You asked a number of questions in your request. The answers to your questions are as follows:

1. For your first question, you asked if ORS 244.040 or any part of Chapter 244 prohibits you from owning the Company while it supplies software that OED uses.

   Ethics Law does not prevent a public official from owning a business, including one that provides services or supplies to the public official's agency. However, public officials who own or operate their own business must keep those interests separate from their public positions. That means not only that you cannot use your agency's time or resources to benefit the Company or your LLC, but also that you cannot use your OED position to create opportunities for the Company or your LLC.

2. For your second question, you asked whether this creates an actual or potential conflict under ORS 244.020, and what disclosure methods would apply.

   Following the analysis above, you would need to make a conflict of interest determination any time you, in your role at OED, are making a decision, taking an action, or making a recommendation regarding the software or any contracts or agreements with the Company or your LLC. If you do need to make a decision or recommendation, or take action, you would first need to make the appropriate disclosures under ORS 244.120(1)(c) and then follow the directives given to you by your appointing authority.

3. For your third question, you asked whether you may continue the technical work described above once you own the supplier, and under what conditions, or whether you should refrain and if so, what is the scope.

   As stated above, Ethics Law does not prevent you from owning a private business, but there needs to be a distinct separation between your role as an OED employee and a private business owner. Therefore, the answer to this question would be determined by analyzing what you do in your role as an OED employee and whether you may be met with a conflict of interest or prohibited

use of office. OGEC cannot provide any advice on whether you should refrain from pursuing your ownership of the software or the LLC. We would recommend, however, that you consult with OED's HR Department and legal counsel to make sure that proceeding as you have indicated is permitted under their policies and regulations.

4. Combining your fourth and fifth questions, you have asked whether supplying the software to your agency for free, and signing a zero-dollar agreement with OED, would have any implications under ORS 244.

   When a conflict of interest takes place under Ethics Law, it is important to note that the financial impact of an official action includes a financial benefit *or* a financial detriment. Thus, removing the license fee or cost of the software in your LLC's agreement with OED would not necessarily prevent a conflict of interest from occurring, as doing so would likely create a financial detriment for your LLC. Separately, there could also be indirect financial benefits from offering the software to OED for free, such as increased sales to other states or private organizations due to increased reputational value.

5. For your sixth question, you asked whether paid agreements with other states' public agencies raise any issues.

   As the LLC's owner, when you are seeking contracts with other states, there could be prohibited use of office implications if you are using or attempting to use your position at OED for financial gain. For example, if you were to make contacts within other states through your role at OED, and then used those contacts or relationships to benefit your LLC, that could be a prohibited use of office.

6. For your seventh question, you have asked whether we have any additional recommendations.

> Given the specialized nature of your work, it is important to be aware of your access to confidential information in your role at OED. As indicated in the definition above, confidential information may include any information available to you in your role at OED that is not publicly disclosed. You will need to remain aware that you cannot use such information for your own personal gain.

I am providing this link to the Commission's Oregon Government Ethics Law Guide for Public Officials as you may find its explanations and examples helpful. If you have any additional questions regarding the application of Oregon Government Ethics law, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director
SVM/an

*****DISCLAIMER*****

This staff advice is provided under the authority given in ORS 244.284(1). This advice offers guidance on how Oregon Government Ethics Law may apply to the specific facts described in your request. This advice is based on my understanding and analysis of the specific circumstances you described and should not be applied to circumstances that differ from those discussed in this request.

Oregon
Tina Kotek, Governor

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September 29, 2026

Sent via email

Jessica Vega Pederson
Multnomah County Chair
501 SE Hawthorne Blvd., Ste. 600
Portland, OR 97214
jessica.vegapederson@multco.us

Re: Advice No. 26-660I

Dear Ms. Vega Pederson:

You inquired about whether you could accept an offer of discounted or waived registration fees for participation in an event. You explained that you have been invited by the board of a non-profit organization – the Mental Health & Addiction Associations of Oregon (MHAAO) -- to participate in one of their marquee fundraising events, the Recovery Rush, on September 30, 2026. The Recovery Rush is a fundraiser whereby participants raise funds by soliciting donations based on the number of floors of a Portland skyscraper they rappel down. There is normally a registration cost of $1,000 to participate (which can be paid outright or raised through donations). To raise awareness about the event, the MHAAO has invited various public figures to participate and has offered to waive the registration cost for those public figures. You have asked whether public officials, such as yourself, can accept this offer of the waived registration cost for this event.

The first step in analyzing an offer such as this is to determine if it qualifies as a gift. ORS 244.020(7)(a) defines a gift as something of economic value offered to a public official for which they do not pay equivalent value or receive at a discount, and that is not offered to others, who are not public officials, on the same terms and conditions. If it does qualify as a gift, you would proceed to determine whether any of the gift exceptions in ORS

244.020(7)(b) might apply, and if not, you would proceed to the analysis under the gift clause in ORS 244.025(1). However, if the offer does not qualify as a gift, as defined in ORS 244.020(7)(a), then no further analysis would be needed.

In this scenario, the waived registration cost of $1,000 certainly has economic value, and equivalent consideration is not being paid. However, if MHAAO is offering that waived registration cost to others, who are not public officials, on the same terms and conditions, then it would not qualify as a gift.

In your initial inquiry, you refer to MHAAO offering to waive the registration costs for certain public figures. But it is not clear whether those they refer to as “public figures” are actually “public officials.” The term “public official” is defined in ORS 244.020(15) as “the First Partner and any person who, when an alleged violation of this chapter occurs, is serving the State of Oregon or any of its political subdivisions or any other public body as defined in ORS 174.109 as an elected official, appointed official, employee or agent, irrespective of whether the person is compensated for the services.” You are certainly a public official, as a Multnomah County Commissioner. The question is whether MHAAO has extended this offer to other persons who are not public officials. They may consider “public figures” to include media or sports figures, who while certainly attracting much public attention do not hold positions that would make them public officials. If MHAAO has offered the waived registration cost to persons who are not public officials, and the offer is on the same terms and conditions, then under the definition in ORS 244.020(7)(a), the waived registration costs would not qualify as a gift.

In a follow-up email, you indicated that you had confirmed with MHAAO that they were waiving registration costs for a number of people, not just public officials. MHAAO reported they had waived the registration cost for the majority of rappellers who fundraised, for the participating Hyatt staff members, for those rappellers participating through sponsorships, and for select nonprofit partners.

Based on this additional information, it does appear that the waived registration cost for this event is being extended to others, who are not public officials, on the same terms and conditions. Thus, the offer would not appear to qualify as a gift, under the definition in ORS 244.020(7)(a). That means it could be accepted without needing to go through any further analysis under the gift clause.

I hope this information is helpful. If you have additional questions or need further clarification, please do not hesitate to reach out to us.

Sincerely,
Susan V. Myers
Susan V. Myers
Executive Director

Oregon
Tina Kotek, Governor

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October 12, 2026

Sent via email

Amanda Hess
NW Public Affairs, LLC
11481 SW Hall Blvd, Suite 201-N
Portland, Oregon 97223

RE: Advice No. 26-678I

Dear Ms. Hess:

This letter of advice is provided in response to your request for guidance on how the gift exceptions in ORS 244.020(7)(b) would apply to a legislator receiving paid expenses for a fact finding mission or trip to attend a Google State Policy Summit (Policy Summit).

The information provided indicates that legislators have been invited to attend the Policy Summit, which will take place at Google's Offices in Austin, Texas, from December 2 to 4, 2026. The Policy Summit is an interactive, educational convening of state legislative leaders from across the country to share ideas and interface directly with Google product and policy staff. The Policy Summit agenda includes programming on four focus areas -- AI, energy, data centers, and privacy – across three days of interactive sessions, product demonstrations, and policy conversations. Google has offered to cover transportation to and from the Policy Summit, meals, and lodging. You have asked whether this event and Google's offer of paid travel expenses would qualify for the gift exception in ORS 244.020(7)(b)(H).

Under most circumstances when a public official is offered food, lodging and travel expenses at no cost to the public official, it would be a gift as defined in ORS 244.020(7)(a), and therefore subject to the gift limitations set forth in ORS 244.025. There are exceptions that allow a public official to accept certain items, such as paid

expenses for food, lodging and travel. In pertinent part, ORS 244.020(7)(b)(H) allows acceptance of the payment of reasonable expenses for food, travel or lodging expenses provided to a public official, and a relative, household member, or staff member accompanying that public official, when the public official is representing state government on an officially sanctioned trade-promotion or fact-finding mission or in officially designated negotiations or economic development activities.

To qualify for this gift exception, the following criteria must be met. First, the public official must be representing state government, a local government or a special government body.

Second, the purpose of the activity or trip must be for trade-promotion or a fact-finding mission, or for negotiations or economic development activities where receipt of expenses is approved in advance. The Commission has adopted an Administrative Rule that defines a “fact finding mission or trip” as “any activity related to a cultural or educational purpose, or any activity aimed at providing intergovernmental assistance, such as for the purpose of international aid or sharing best practices, or developing intergovernmental relationships directly related to the public official’s duties. The sponsor of a fact-finding mission should be directly and immediately associated with the event, or the location being visited.” [OAR 199-005-0001(2)].

Third, the activities must be “officially sanctioned or officially designated,” which requires written approval by a state or local public body or by a person authorized by the public body to provide that approval. When the activity is officially designated as negotiations or economic activity, the written notice will include approval for the public official to accept the payment of reasonable expenses. [OAR 199-005-0020(3)(b)]. The Administrative Rule goes on to clarify that for members of the legislative assembly, the written approval must be provided by the President of the Senate, Speaker of the House, the designated majority or minority leaders of either chamber or appointed

committees of the Legislative Assembly, unless the public body determines otherwise. [OAR 199-005-0020(3)(b)(C)].

So long as the legislators are attending the Policy Summit in their official capacities, as representatives of state government, that would satisfy the first criteria. For the second criteria, the Policy Summit would appear to qualify as a fact-finding mission, as it has an educational purpose and is aimed at developing intergovernmental relationships and sharing best practices. For the third criteria, the legislators who are invited to attend the Policy Summit would need to follow the procedure(s) required by their leadership in the Legislative Assembly to ensure the activities are officially sanctioned or designated.

Assuming that all three criteria are satisfied, then it would appear that under the gift exception in ORS 244.020(7)(b)(H), the legislators could accept the food, travel and lodging expenses paid by Google for their attendance at the Policy Summit.

Finally, as legislators are required to file Annual Verified Statements of Economic Interest (SEI), each legislator attending this Google Policy Summit and receiving the paid travel expenses will be required to report the aggregate value of these paid expenses on their 2026 SEIs. ORS 244.060(6) requires public officials to identify all expenses with an aggregate value exceeding $50 when participating in an event described in ORS 244.020(7)(b)(H). Per this requirement, Google, the source of the paid expenses, should provide the legislators with a written statement of the expenses they paid on that legislator's behalf.

If you have any additional questions or need further clarification, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

Oregon
Tina Kotek, Governor

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November 3, 2026

Sent via email

April Burbank
Oregon Department of Human Services
815 NE Davis Street
Portland, Oregon 97232

RE: Advice No. 26-688I

Dear Ms. Burbank:

This letter of advice is provided in response to your request for guidance on how the gift exceptions in ORS 244.020(7)(b) would apply to the Oregon Department of Human Services (ODHS) Self Sufficiency Programs (SSP) and Child Welfare (CW) staff who have been invited to attend and participate in a fundraising event.

The information provided indicates that District 2 and 3 ODHS SSP and CW staff have been invited to attend a fundraising event hosted by Painted Horse Recovery (Painted Horse), which will take place in Portland, Oregon, on November 6, 2026. The event will also be open to members of the public. Attendance requires the purchase of a table which costs $2,500. A local health organization purchased a table, but they were unable to fill four seats. Painted Horse has offered the four remaining seats at that table to ODHS SSP and Child Welfare staff. If they attend, it would be in their official capacity. In light of all this, you have asked whether Ethics Law would prohibit ODHS staff from accepting the offer from Painted Horse of complimentary attendance at this fundraising event.

The first step in evaluating whether ODHS SSP and CW staff can accept the offer is to determine whether it qualifies as a gift. ORS 244.020(7)(a) defines a gift as something of economic value given to a public official or candidate, or their relatives or household

members, without equivalent consideration or at a discount, and that is not offered to others on the same terms and conditions.

According to its website, Painted Horse will host its annual 2026 Connection 2 Culture Night on November 6 to raise funds “to help the Native American community to increase space for culture and traditional practices.” Attending guests will receive a plated dinner and have the opportunity to participate in a silent action from Indigenous artists. In this case, as the offer includes a dinner, which has an economic value, and it is not being offered to others on the same terms and conditions, it appears that the offer from Painted Horse to ODHS SSP and CW staff may qualify as a gift, per the definition in ORS 244.020(7)(a).

The next step is to determine whether any of the gift exceptions in ORS 244.020(7)(b) apply. If they do, then the offer would not qualify as a gift and could be accepted.

ORS 244.020(7)(b)(E) provides that a gift does not include the cost of admission or food and beverage consumed by the public official (or a relative, household member or staff member accompanying the public official) at a reception, meal or meeting held by an organization when the public official is representing state government, a local government, or a special government body.

The Oregon Government Ethics Commission has adopted an Administrative Rule that identifies a number of factors that indicate whether paid expenses for such an event would qualify under this exception. [OAR 199-005-0015]. These factors include:

1. A large number of people or groups are invited.
2. The invitations or programs are sent in advance.
3. The event is publicized.
4. The reception, meal, or meeting is open to the public.
5. Written materials such as a printed program are available.

In this case, while it is unclear whether a large number of people or groups have been invited, it does appear that the event has been well publicized (as indicated on Painted Horse's website). Moreover, it appears that the reception, meal or meeting is open to the public. In this case, Painted Horse's website provides written materials on its annual 2026 Connection 2 Culture Night and permits individuals to register for the event online. The website information indicates the invitations or programs for the event have been published in advance. Although not all factors in the rules are satisfied, it does appear that a majority of them have been satisfied. Therefore, the event would appear to qualify for the gift exception in ORS 244.020(7)(b)(E), which means that the ODHS employees could accept the offer without violating the gift clause.

If you have any additional questions or need further clarification, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

*****DISCLAIMER*****

This staff advice is provided under the authority given in ORS 244.284(1). This advice offers guidance on how Oregon Government Ethics Law may apply to the specific facts described in your request. This advice is based on my understanding and analysis of the specific circumstances you described and should not be applied to circumstances that differ from those discussed in this request.

Oregon
Tina Kotek, Governor

Government Ethics Commission
3218 Pringle Rd SE, Ste 220
Salem, OR 97302-1680
Telephone: 503-378-5105
Fax: 503-373-1456
E-mail: mail@ogec.oregon.gov
Website: www.oregon.gov/ogec

October 16, 2026

Sent via email

Honorable Senator David Brock Smith
Oregon Legislative Assembly
900 Court St. NE, S-316
Salem, OR 97301

RE: Advice Number 26-690I

Dear Senator Brock Smith:

Thank you for reaching out to the Oregon Government Ethics Commission (Commission) with your inquiry regarding whether any of the gift exceptions in ORS 244.020(7)(b) would apply to acceptance of paid travel expenses to attend the Pacific Legal Foundation's Regulatory Reform Summit in November 2026.

You have been invited to attend the Pacific Legal Foundation's 2026 Regulatory Reform Summit (the "Summit") being held in Philadelphia, Pennsylvania on November 16 and 17, 2026. The Summit will include various roundtable discussions about regulatory reforms in the legislative, executive, and judicial branches of government. The event will include a receptions, meals, and a tour of Independence Hall. The Pacific Legal Foundation has offered to pay for all travel expenses, including transportation, food, and lodging, as well as for admission to the tour of Independence Hall. Your request for guidance asks whether these paid travel expenses would fall within any of the gift exceptions in ORS Chapter 244.

Under most circumstances when a public official is offered food, lodging and travel expenses at no cost or at a discount, it would be considered a gift as defined in ORS 244.020(7)(a), and subject to the gift limitations in ORS 244.025. There are exceptions, however, when a public official may accept certain items, such as paid travel expenses.

One such exception is in ORS 244.020(7)(b)(F), which applies to reasonable expenses paid for a public official's attendance at a convention, fact-finding mission or trip, conference, or other meeting if the public official is scheduled to deliver a speech, make a presentation, participate on a panel, or represent state government, a local government or a special government body.

For the (F) exception to apply, the travel expenses must be for a fact-finding mission or trip, defined in the Administrative Rules as "any activity related to a cultural or educational purpose, or any activity aimed at providing intergovernmental assistance, such as for the purpose of international aid or sharing best practices, or developing intergovernmental relationships directly related to the public official's duties. The sponsor of a fact finding mission should be directly and immediately associated with the event or location being visited." [OAR 199-004-0001(2)]. In this case, the Summit would appear to qualify as a fact-finding mission or trip, as it has an educational purpose and appears to be aimed at sharing best practices and developing intergovernmental relationships. The sponsor, the Pacific Legal Foundation, is directly associated with the event.

The (F) exception requires that the expenses must be paid by the federal government, a state or local government, a Native American tribe that is recognized by federal law or formally acknowledged by a state, a membership organization to which a public body pays dues, or a non-profit 501(c)(3) corporation. In this case, the expenses would be paid by the Pacific Legal Foundation, which is a 501(c)(3) corporation, which is one of the entity types identified in the (F) exception.

The Summit appears to qualify as a fact-finding mission and you would be participating in it as a representative of State government. The source of the paid travel expenses is a 501(c)(3) corporation. Therefore, the paid travel expenses to attend the Summit would qualify for the gift exception in ORS 244.020(7)(b)(F).

With respect to the paid admission for the tour of Independence Hall, the gift exception in ORS 244.020(7)(b)(M) would appear to apply. This exception allows a public official to accept paid entertainment expenses if the entertainment provided to the public official is incidental to the main purpose of another event. The tour of Independence Hall would appear to qualify as entertainment that is secondary to the main purpose of the primary event (i.e., the Summit). Thus, paid admission for the tour of Independence Hall would be permitted under ORS 192.020(7)(b)(M) and the corresponding Administrative Rule, OAR 199-005-0026(1).

Finally, as you are required to file an Annual Verified Statement of Economic Interest (SEI), please note that ORS 244.060(5) requires SEI filers to identify all expenses with an aggregate value exceeding $50 received during the preceding calendar year when participating in a convention, mission, trip or other meeting described in ORS 244.020(7)(b)(F). The Pacific Legal Foundation is required to provide you with written notice of the expenses paid within 10 days (ORS 244.100), and you will be required to report those paid expenses on your 2027 SEI.

If you have any additional questions or need further clarification, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

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Oregon
Tina Kotek, Governor

Government Ethics Commission
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Salem, OR 97302-1680
Telephone: 503-378-5105
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E-mail: mail@ogec.oregon.gov
Website: www.oregon.gov/ogec

October 16, 2026

Sent via email

Alec MacDonald-Factor
NW Public Affairs
2636 SW Bertha Blvd.
Portland, OR 97230

RE: Advice Number 26-693I

Dear Alec MacDonald-Factor:

Thank you for reaching out to the Oregon Government Ethics Commission (Commission) with your inquiry regarding whether any of the gift exceptions in ORS 244.020(7)(b) would apply to acceptance by legislators and other Oregon public officials of paid travel expenses to attend a community schools learning event and tour.

The Anaheim Unified School District in California is leading a community school learning event where they will take community organizations and state legislators from throughout the country on site visits to an urban and rural community school (one in Sacramento and another in the Los Angeles area). The site visits are an opportunity to learn more about the community school framework and to engage with other leaders on how the community school framework may meet the challenges facing our schools. You indicate that one of your clients, Foundations for a Better Oregon, will be attending the event and tour, and would like to organize a cohort of local education leaders, community partners, and Oregon legislators to join them at this event. Your client has asked if they would be able to cover the legislators' travel and lodging expenses for this event under any of the gift exceptions in ORS Chapter 244.

Under most circumstances when a public official is offered food, lodging and travel expenses at no cost or at a discount, it would be considered a gift as defined in ORS

244.020(7)(a), and subject to the gift limitations in ORS 244.025. There are exceptions, however, when a public official may accept certain items, such as paid travel expenses.

One such exception is in ORS 244.020(7)(b)(F), which applies to reasonable expenses paid for a public official's attendance at a convention, fact-finding mission or trip, conference, or other meeting if the public official is scheduled to deliver a speech, make a presentation, participate on a panel, or represent state government, a local government or a special government body.

For the (F) exception to apply, the travel expenses must be for a fact-finding mission or trip, defined in the Administrative Rules as "any activity related to a cultural or educational purpose, or any activity aimed at providing intergovernmental assistance, such as for the purpose of international aid or sharing best practices, or developing intergovernmental relationships directly related to the public official's duties. The sponsor of a fact finding mission should be directly and immediately associated with the event or location being visited." [OAR 199-004-0001(2)]. In this case, the community school learning event and site visits would appear to qualify as a fact-finding mission or trip, as it has an educational purpose and appears to be aimed at sharing best practices and developing intergovernmental relationships. Your client, the source of the paid travel expenses, would be participating in the event.

The (F) exception requires that the expenses must be paid by the federal government, a state or local government, a Native American tribe that is recognized by federal law or formally acknowledged by a state, a membership organization to which a public body pays dues, or a non-profit 501(c)(3) corporation. In this case, the expenses would be paid by your client, Foundations for a Better Oregon, which is a 501(c)(3) corporation, one of the entity types identified in the (F) exception. The source of the paid travel expenses is a 501(c)(3) corporation.

The event appears to qualify as a fact-finding mission. Assuming that the legislators and other Oregon public officials would be participating in the event as representatives of State government, a local government, or a special government body, the paid travel expenses would qualify for the gift exception in ORS 244.020(7)(b)(F).

Finally, any of the public officials who is required to file an Annual Verified Statement of Economic Interest (SEI) will need to note that ORS 244.060(5) requires SEI filers to identify all expenses with an aggregate value exceeding $50 received during the preceding calendar year when participating in a convention, mission, trip or other meeting described in ORS 244.020(7)(b)(F). The source of the paid travel expenses is required to provide those officials with written notice of the expenses paid within 10 days (ORS 244.100), and the officials will be required to report those paid expenses on their SEIs.

If you have any additional questions or need further clarification, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

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Website: www.oregon.gov/ogec

October 16, 2026

Sent via email

Elana Lynn
Focus Point Communications
30250 SW Parkway Blvd., Ste. 4
Wilsonville, OR 97070

RE: Advice No. 26-694I

Dear Ms. Lynn:

This letter of advice is provided in response to your request for guidance on how the gift exceptions in ORS 244.020(7)(b) would apply to legislators receiving paid expenses for a data center tour event.

The information provided indicates that your client, the Oregon State Association of Electrical Workers (OSAEW), would like to invite various legislators on a tour of a data center in Quincy, Washington on December 9-10, 2026. The legislators would include members of the Senate Energy and Environment Committee and the House Climate, Energy and Environment Committee. Members of legislative leadership and other legislators may also be invited. During this data center tour event, legislators would tour a data center located in Quincy, Washington, hear from experts who helped to build these facilities, and learn about how this specific site and city has benefited from bolstered economic and municipal development in this rural area. The OSEAW plans to offer to cover the travel, lodging, and meal costs for this event. You have asked whether this event and OSEAW's offer of paid expenses would qualify for one of the gift exceptions in ORS 244.020(7)(b).

Under most circumstances when a public official is offered food, lodging and travel expenses at no cost to the public official, it would be a gift as defined in ORS 244.020(7)(a), and therefore subject to the gift limitations set forth in ORS 244.025. There are exceptions that allow a public official to accept certain items, such as paid expenses for food, lodging

and travel. ORS 244.020(7)(b)(H) allows acceptance of the payment of reasonable expenses for food, travel or lodging expenses provided to a public official, and a relative, household member, or staff member accompanying that public official, when the public official is representing state government on an officially sanctioned trade-promotion or fact-finding mission or in officially designated negotiations or economic development activities.

To qualify for this gift exception, the following criteria must be met. First, the public official must be representing state government, a local government or a special government body.

Second, the purpose of the activity or trip must be for trade-promotion or a fact-finding mission, or for negotiations or economic development activities where receipt of expenses is approved in advance. OAR 199-005-0001(2)defines a “fact finding mission or trip” as “any activity related to a cultural or educational purpose, or any activity aimed at providing intergovernmental assistance, such as for the purpose of international aid or sharing best practices, or developing intergovernmental relationships directly related to the public official’s duties. The sponsor of a fact-finding mission should be directly and immediately associated with the event, or the location being visited.”

Third, the activities must be “officially sanctioned or officially designated,” which requires written approval by a state or local public body or by a person authorized by the public body to provide that approval. When the activity is officially designated as negotiations or economic activity, the written notice will include approval for the public official to accept the payment of reasonable expenses. [OAR 199-005-0020(3)(b)]. The Administrative Rule goes on to clarify that for members of the legislative assembly, the written approval must be provided by the President of the Senate, Speaker of the House, the designated majority or minority leaders of either chamber or appointed committees of the Legislative Assembly, unless the public body determines otherwise. [OAR 199-005-0020(3)(b)(C)].

So long as the legislators are attending the data center tour event in their official capacities, as representatives of state government, that would satisfy the first criteria. For the second

criteria, the data center tour event would appear to qualify as a fact-finding mission, as it has an educational purpose. For the third criteria, the legislators who are invited to attend the data center tour event would need to follow the procedure(s) required by their leadership in the Legislative Assembly to ensure the activities are officially sanctioned or designated.

Assuming that all three criteria are satisfied, then it would appear that under the gift exception in ORS 244.020(7)(b)(H), the legislators could accept the food, travel and lodging expenses paid by the OSEAW for their attendance at the data center tour event.

Finally, as legislators are required to file Annual Verified Statements of Economic Interest (SEI), each legislator attending this data center tour event and receiving the paid travel expenses will be required to report the aggregate value of these paid expenses on their 2027 SEIs. ORS 244.060(6) requires public officials to identify all expenses with an aggregate value exceeding $50 when participating in an event described in ORS 244.020(7)(b)(H). Per this requirement, the OSEAW, the source of the paid expenses, should provide the legislators with a written statement of the expenses they paid on that legislator's behalf.

If you have any additional questions, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

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Oregon
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Website: www.oregon.gov/ogec

October 22, 2026

Sent by email

Carrie MacLaren
Metro
600 NE Grand Ave.
Portland, OR 97232-2736

Re: Advice No. 26-698I

Dear Carrie MacLaren:

This letter of advice is provided in response to your request received on September 24, 2026, regarding application of the ethics laws to the provision of reserved parking spots to Metro elected officials.

The information provided indicates that the Metro Councilors and the Metro Auditor (hereinafter “Metro Officials”) each receive a salary, as established by the Metro Charter, and are eligible for fringe benefits, as determined by the Chief Operating Officer. The Metro Officials are provided offices at the Metro Regional Center (MRC) in Portland, and some, but not all, Metro Council meetings are held at the MRC. The Chief Operating Officer recently implemented paid parking for employees in the underground garage at the MRC. The Chief Operating Officer would like to provide reserved spaces in this garage free of charge to Metro Officials in order to provide them with secure and efficient access to Metro offices and meeting space. Use of the reserved parking spaces would be limited to when the Metro Officials were conducting official business at MRC (attending meetings or performing their duties), and not for personal use. The Chief Operating Officer does not wish to adopt or implement a policy that would create potential ethics issues for the Metro Officials, and therefore seeks advice from OGEC on whether doing so would raise any ethics concerns.

As the determination of whether to provide reserved parking spaces at MRC to the Metro Officials free-of-charge is being made by the Chief Operating Officer, and not by the Metro Officials themselves, they would not be met with a conflict of interest. Under the ethics laws in ORS Chapter 244, the question would be whether the Metro Officials would be engaging in a prohibited use of office or position by accepting the paid reserved parking spaces.

ORS 244.040(1) prohibits a public official from using or attempting to use their office or position to obtain a financial gain or avoid a financial detriment, for themselves, their relatives or household members, or for any businesses with which they are associated, if the financial gain/avoidance of detriment would not otherwise be available to them but for their holding of the public office or position.

The Metro Officials could accept the reserved parking spaces at MRC without engaging in a prohibited use of office or position. The parking spaces are being provided to the Metro Officials as a fringe benefit, per a policy adopted by the Chief Operating Officer. Such a benefit would be part of the Metro Officials' official compensation packages and could be accepted without violating ORS 244.040(1).

ORS 244.040(2)(a) permits public officials to accept any part of an official compensation package as determined by the public body that they serve. OAR 199-008-0005(3) defines an "official compensation package" to include the wages and other benefits provided to the public official by their public body. To be part of the public official's "official compensation package", the wages and benefits must have been specifically approved by the public body in a formal manner, such as through a union contract, an employment contract, or other adopted personnel policies that apply generally to employees or other public officials.

Based on the information provided, the Chief Operating Officer would be formally approving the parking space benefit for the Metro Officials and by policy would set forth the restrictions described above on the use of those reserved parking spaces. Thus, the parking spaces and the use restrictions will become part of their official compensation packages. And per ORS

244.040(2)(a), the Metro Officials can accept any part of their official compensation packages without violating ORS 244.040(1).

An alternative analysis is that described in a prior advice letter (Advice No. 25-565I). That advice examined the provision of parking passes to City of Salem officials and employees and concluded that because the parking passes were being provided by the City to enable the officials and employees to perform their official duties, they did not constitute a personal financial gain or avoidance of detriment.

While this alternative analysis could apply here, we note that all other Metro employees using the MRC parking garage are required to pay for their parking spaces, even if they are being used to enable those employees to perform their official duties. Thus, the provision of these parking spaces to the Metro Officials could be considered an avoidance of financial detriment, unless the exception in ORS 244.040(2)(a) is applied.

The better analysis would be to use the official compensation package exception in ORS 244.040(2)(a). It ensures that the benefit of the reserved parking spaces, and the restrictions on their use, have been specifically and formally approved by the Chief Operating Officer.

If you have any additional questions, or need further clarification, please do not hesitate to reach out to me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

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Website: www.oregon.gov/ogec

November 3, 2026

Sent via email

Andrew Potts
61289 Bronze Meadow Lane
Bend, Oregon 97702

Re: Advice No. 26-702I

Dear Andrew Potts:

This letter provides advice in response to your request, received on October 26, 2026, for guidance on application of Oregon Government Ethics Law to the private employment of former public officials.

Your request indicated that you are currently employed as a City Engineer by the City of Millersburg. You mentioned that you are leaving your current position as a City Engineer and joining a private company, Jacobs Engineering. Jacobs Engineering has had and continues to have contracts with the City of Millersburg. You stated that as a City Engineer you manage projects and consultants, including projects where Jacobs Engineering has either contributed or continues to participate. You clarified that as a City Engineer you do not sign contracts on behalf of the City of Millersburg. You also indicate that your new position with Jacobs Engineering will be in Central Oregon and your work would not involve any projects related to City of Millersburg. Through this request for advice, you are seeking clarification to ensure that your new position complies with the Oregon Government Ethics Law.

The Oregon Government Ethics Law in ORS Chapter 244 sets some restrictions for post-employment of former public officials. In your case, the relevant restrictions are in ORS 244.047 and ORS 244.040(5).

ORS 244.047 prohibits a former public official from directly benefitting from a public contract that the public official helped authorize while in public office. This provision restricts a former public official from having a direct beneficial financial interest in a public contract for two years from the date of its authorization. A public contract is "authorized by" a public official if they performed a significant role in the selection of a contractor or the execution of the contract. A significant role can include reommending approval or signing o the contract, including serving on a selection committee or team, or having the final authorizing authority for the contract. [OAR 199-008-0005(6)]

Based on the information you provided, you did not sign the current contract between Jacobs Engineering and the City of Millersburg. While signing the contract is part of what counts as authorizing it, there are other actions you could have taken that would qualify as authorizing. For example, if you were part of the selection committee that reviewed proposals and recommended Jacobs Engineering, that also would mean you authorized the contract. Assuming that you were not involved in any way in authorizing the City's contract with Jacobs Engineering, then under ORS 244.047, you would not be prohibited from working for Jacobs Engineering, even on the City of Millersburg's contract. On the other hand, if you had been involved in authorizing the City's contract with Jacobs Engineering, then you would be prohibited for two years from working for Jacobs Engineering on that contract or from receiving any direct financial benefit from that contract. In that situation, you could still work for Jacobs Engineering, just not in a role where you could receive any direct financial benefit from the City's contract.

There is another provision to be aware of. ORS 244.040(5) provides that "a former public official may not attempt to further or further the personal gain of any person through the use of confidential information gained in the course of or by reason of holding position as a public official or the activities of the person as a public official." This prohibition does not have any time limit. The Oregon Administrative Rules (OAR) 199-008-0005(5) defines confidential information as "any record that is exempt from public disclosure or inspection under state law, or any information obtained in the

course of or by reason of holding position as a public official that is not publicly disclosed. The record or information is no longer confidential if it has been voluntarily disclosed by the public body or been disclosed through a public records disclosure order or court order."

As a City Engineer, you managed projects and consultants for the City of Millersburg. In that role, you may have had access to confidential information because of your public position. That confidential information could be related to the contracts between the City and Jacobs Engineering, or to competing contracts with or proposals from other vendors, or even just related to current or upcoming projects at the City. Should you use any of that confidential information in a way that would benefit yourself or another person, including Jacobs Engineering, you could potentially violate ORS 244.040(5).

I hope this information is helpful. If you have any additional questions regarding the application of Oregon Government Ethics Law, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director
SVM/sd

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MEMORANDUM

DATE: November 13, 2026

TO: Susan V. Myers, Executive Director

FROM: Sheetal Digari, Investigator

SUBJECT: Case No. 26-567ESD

The purpose of this memorandum is to request the investigative phase of Case No. 26-567ESD, be suspended, as allowed per ORS 244.260(6)(c)(A).

The preliminary review in this matter was opened by the Commission on its own motion on August 14, 2026. The preliminary review report on this matter is being presented to the Commission in executive session at its meeting on November 13, 2026, and the Commission will vote on whether or not to initiate an investigation of the matter.

ORS 244.260(6)(c)(A) provides that the 180 day time limit imposed on the Commission's investigation may be suspended if there is a pending criminal investigation that relates to the issues arising out of the underlying facts or conduct at issue in the matter before the Commission and the Commission determines that it cannot adequately complete its investigation until the pending criminal investigation is complete.

In Case No. 26-567ESD, materials upon which the preliminary review was initiated indicate there is a pending criminal case against the respondent in Clackamas County Circuit Court. The conduct at issue in the case before the Commission is the same conduct that forms part of the basis for the pending criminal prosecution. Therefore, Commission staff's recommendation is that the Commission vote to suspend the investigation time limit pending completion of the criminal investigation.

Commission Staff informed the respondent via their attorney that a motion to suspend the investigation will be presented and voted on at the November 13 Commission meeting.

MEMORANDUM

DATE: November 13, 2026

TO: Susan V. Myers, Executive Director

FROM: Sheetal Digari, Investigator

SUBJECT: Case No. 26-568ESD

The purpose of this memorandum is to request the investigative phase of Case No. 26-568ESD, be suspended, as allowed per ORS 244.260(6)(c)(A).

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ORS 244.260(6)(c)(A) provides that the 180 day time limit imposed on the Commission's investigation may be suspended if there is a pending criminal investigation that relates to the issues arising out of the underlying facts or conduct at issue in the matter before the Commission and the Commission determines that it cannot adequately complete its investigation until the pending criminal investigation is complete.

In Case No. 26-568ESD, materials upon which the preliminary review was initiated indicate there is a pending criminal case against the respondent in Lane County Circuit Court. The conduct at issue in the case before the Commission is the same conduct that forms part of the basis for the pending criminal prosecution. Therefore, Commission staff's recommendation is that the Commission vote to suspend the investigation time limit pending completion of the criminal investigation.

Commission Staff informed the respondent that a motion to suspend the investigation will be presented and voted on at the November 13 Commission meeting.

OGEC Training Report

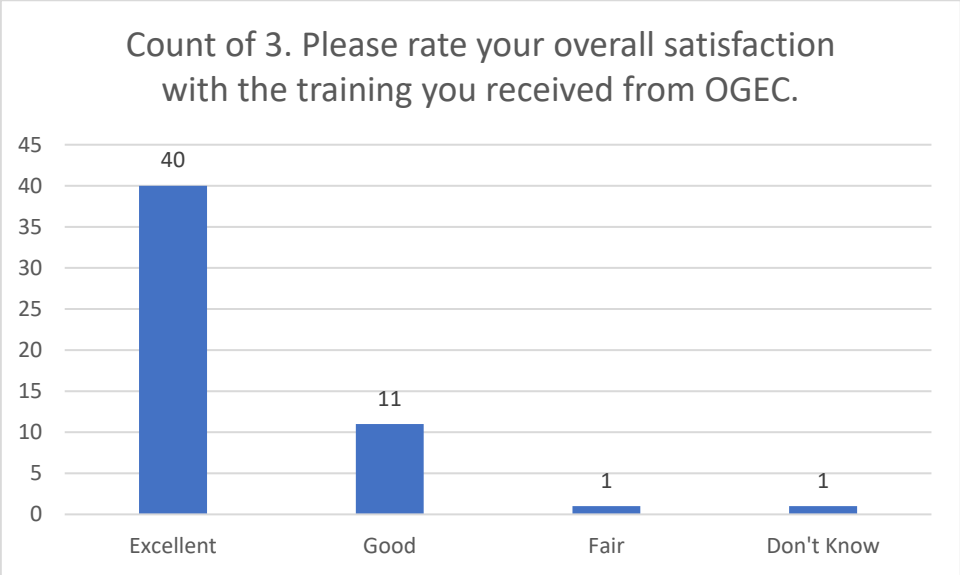
November Commission Meeting Facilitators

- Room/Online Facilitator: Angela
- Participation Facilitator: Lex
- Facilitation Lead/Media Contact: Stephanie

2027 Participant Feedback

We ask participants to share their feedback on our trainings after every session. This includes questions regarding their experience and how we can improve our trainings.

- Overall Satisfaction of OGEC Trainings During 2027



- Feedback shared directly with the trainers this year:
  - Ruth: Participants at the Northern Wasco County People's Utility District training shared that it was very helpful to attend a live session on Public Meetings Law and have the opportunity to ask follow-up questions during training.

- Angela: The Silverton Police Chief offered me a challenge coin (which I declined due to agency policy) to recognize how much he enjoyed our training! He said that it was engaging and easy to understand.
- Chris: The Data Governance Committee chair reached out to let us know members commented that the training I provided was the best Ethics training they have participated in.

October Training Highlights

Accessibility Workgroup

- Accessibility updates for the JC and SEI guides
- Review of OGEC Style Guide, set to publish this month
- Audit of recruitment materials
- And a plan for working on team-specific templates

Public Meetings Law Trainings

- Ruth and Lex provided training for the Northern Wasco County People's Utility District.

Government Ethics Law Trainings

- Chris and Angela provided the Ethics Overview training for the Oregon Department of Emergency Management (OEM) and the City of Silverton.

Communications

- A copy of the October edition of the Ethics Matters Newsletter is in your meeting books.
- Bulletin engagement rate for October was 40.75%.

Training Outreach & Collaboration

- Association of Oregon Counties has invited us to provide a Government Ethics Law session during their 2026 November Conference. We will also be providing Public Meetings Law training at County College in 2027.

- Special Districts Association of Oregon has invited us to provide a Public Meetings Law session at their annual conference in February 2027.
- Oregon Fire Chiefs Association has partnered with us to offer 20 in person Public Meetings Law training sessions across the state in 2027. These sessions will be open to governing body members from any public body in the area. We will have registration open for the first three months and start advertising for the dates very soon. Current 2027 Schedule:
    - **January:** Medford and Seaside
    - **February:** Eugene and Newport
    - **March:** Banks and Jantzen Beach
    - **April:** Chiloquin and Umatilla
    - **May:** The Dalles and Bend
    - **June:** Jefferson and Tillamook
    - **July:** Sisters and Coos Bay
    - **August:** Ashland and Depoe Bay
    - **September:** Tualatin and St. Helens
    - **October:** Charleston and Klamath Falls

Staffing

- We are currently recruiting for an Administrative Specialist 2 to provide administrative support and business process improvements to the training program.

Trainings Completed (September 29 – October 3, 2026)

These trainings are hosted by public bodies across the state both online and in-person. Some hosted training sessions are open to public officials from other governing bodies to attend. The public body who hosts the training is listed first, followed by the public bodies represented by other attendees.

Area of Law	Public Body	Location
ORS 192	Department of Administrative Services: Executive Recruiters	Online
ORS 192	Oregon Government Finance Officers Association	Online
ORS 244	Oregon Emergency Management	Salem

ORS 244	City of Silverton	Silverton
ORS 192	Northern Wasco Community People's Utility District	The Dalles
ORS 244	Jackson County Health and Human Services	Medford

OGEC Webinars (September 29 – October 30, 2026)

These online trainings are open to anyone to sign-up for through our website. Most of the topics are offered once a month. Public Meetings Law webinars are currently offered at least once a week.

Area of Law	Webinar Topic	October
ORS 244	New Employee Orientation	1 Session
ORS 244	New Councilor or Commissioner Orientation	1 Session
ORS 244	Use of Office/Conflicts of Interest	1 Session
ORS 244	Gifts	Canceled
ORS 244	Jurisdictional Contact Overview	Canceled
ORS 192	Public Meetings Law	4 Sessions
ORS 192	Executive Sessions	1 Session
ORS 171	Lobby Law Filing Requirements	1 Session

EXECUTIVE DIRECTOR'S REPORT
11/03//2026

Budget
2027-29: Our Agency Request Budget (ARB) has been preliminarily approved by DAS.

2025-27: Our current surplus is $440,022.96.

Recruitment
We have posted the job announcement for the Administrative Specialist 2 position. The recruitment process is underway, and we are hoping to get someone in the position in early January.

Public Meetings Law Workgroup
The legislative workgroup focusing on public meetings law is continuing its meetings. The next meeting is scheduled for Thursday, November 12.

Associations
We are continuing to meet with representatives of some of the associations. We are holding a work session with four associations and the Commission on November 12. We will also be reaching out to some of the other associations to encourage future meetings between them and the Commission.

OREGON GOVERNMENT ETHICS COMMISSION
AY27 CASH FLOW
AS OF SEPTEMBER 2026 ACTUALS

		Appn 30000 - Admin - PCA 41501				Appn 70000 - GF - PCA 00501			
		Actuals To Date	Actuals + Projected	2025-2027 LAB	Variance	Actuals To Date	Actuals + Projected	2025-2027 LAB	Variance
	Beginning Cash Balance	1,041,552.16	1,041,552.16	715,787.00 18,521.00		-	-		
REVENUE									
0415	ADMINISTRATIVE AND SERVICES CHARGES	5,371,678.99	7,005,742.00	7,005,742.00	0.00	-	-	-	0.00
0505	FINES AND FORFEITS	551.43	551.43	-	(551.43)	113,015.98	113,015.98	50,000.00	(63,015.98)
0975	OTHER REVENUE	-	-	-	0.00	-	-	-	0.00
	Total Revenue	**5,372,230.42**	**7,006,293.43**	**7,740,050.00**	(551.43)	**113,015.98**	**113,015.98**	**50,000.00**	(63,015.98)
TRANSFERS									
2010	TRANSFER OUT TO OTHER FUNDS	-	-	-	0.00	-	-	-	0.00
1107	TRANSFER IN FROM DEPT OF ADMIN SVCS	-	-	(50,000.00)	(50,000.00)	-	-	-	0.00
	Total Transfers	**-**	**-**	**(50,000.00)**	(50,000.00)	**-**	**-**	**-**	0.00
	Total Available Revenues			**7,690,050.00**					
PERSONAL SERVICES									
3110	CLASS/UNCLASS SALARY & PER DIEM	1,520,499.54	2,631,322.72	2,739,188.00	107,865.28	-	-	-	0.00
3115	BOARD MEMBER STIPENDS	12,816.00	24,219.00	29,065.00	4,846.00				
3160	TEMPORARY APPOINTMENTS	-	-	548.00	548.00	-	-	-	0.00
3170	OVERTIME PAYMENTS	-	-	-	0.00	-	-	-	0.00
3190	ALL OTHER DIFFERENTIAL	14,445.93	23,750.15	-	(23,750.15)				
3210	ERB ASSESSMENT	579.00	957.00	1,080.00	123.00	-	-	-	0.00
3220	PUBLIC EMPLOYES' RETIREMENT SYSTEM	320,293.47	568,905.56	534,682.00	(34,223.56)	-	-	-	0.00
3221	PENSION BOND CONTRIBUTION	61,777.57	115,787.89	99,125.00	(16,662.89)	-	-	-	0.00
3230	SOCIAL SECURITY TAX	119,307.61	205,803.33	195,827.00	(9,976.33)	-	-	-	0.00
3241	PAID LEAVE OREGON-EMPLOYER	6,238.31	10,445.86	10,163.00	(282.86)				
3250	WORKERS' COMPENSATION ASSESSMENT	282.89	517.79	630.00	112.21	-	-	-	0.00
3260	MASS TRANSIT	9,209.41	15,790.10	15,344.00	(446.10)	-	-	-	0.00
3270	FLEXIBLE BENEFITS	383,787.58	652,363.58	636,120.00	(16,243.58)	-	-	-	0.00
3465	RECON ADJUSTMENT	-	-	-	0.00				
	Total Personal Services	**2,449,237.31**	4,249,862.99	4,261,772.00	11,909.01	**-**	**-**	**-**	0.00
SERVICES AND SUPPLIES									
4100	INSTATE TRAVEL	7,809.20	47,409.20	25,398.00	(22,011.20)	-	-	-	0.00
4125	OUT-OF-STATE TRAVEL	-	5,000.00	-	(5,000.00)	-	-	-	0.00
4150	EMPLOYEE TRAINING	6,410.61	51,410.61	25,453.00	(25,957.61)	-	-	-	0.00
4175	OFFICE EXPENSES	12,203.66	19,403.66	38,980.00	19,576.34	-	-	-	0.00
4200	TELECOMM/TECH SVC AND SUPPLIES	18,705.99	33,705.99	49,674.00	15,968.01	-	-	-	0.00
4225	STATE GOVERNMENT SERVICE CHARGES	188,429.23	195,162.13	195,536.00	373.87	-	-	-	0.00
4250	DATA PROCESSING	91,703.08	112,576.08	124,288.00	11,711.92	-	-	-	0.00
4275	PUBLICITY & PUBLICATIONS	652.28	652.28	2,490.00	1,837.72	-	-	-	0.00
4300	PROFESSIONAL SERVICES	2,180.31	2,180.31	12,119.00	9,938.69	-	-	-	0.00
4315	IT PROFESSIONAL SERVICES	323,564.50	846,414.50	957,186.00	110,771.50	-	-	-	0.00
4325	ATTORNEY GENERAL LEGAL FEES	397,654.70	904,905.10	915,394.00	10,488.90	-	-	-	0.00
4375	EMPLOYEE RECRUITMENT & DEVELOPMENT	-	-	5,161.00	5,161.00	-	-	-	0.00
4400	DUES AND SUBSCRIPTIONS	18.00	18.00	3,018.00	3,000.00	-	-	-	0.00
4425	FACILITIES RENT & TAXES	82,178.16	142,470.92	201,106.00	58,635.08	-	-	-	0.00
4575	AGENCY PROGRAM RELATED SVCS & SUPP	1,680.71	1,680.71	52,100.00	50,419.29	-	-	-	0.00
4650	OTHER SERVICES AND SUPPLIES	209,510.08	218,510.08	330,813.00	112,302.92	-	-	-	0.00
4700	EXPENDABLE PROPERTY $250-$5000	1,801.69	1,801.69	32,820.00	31,018.31	-	-	-	0.00
4715	IT EXPENDABLE PROPERTY	35,120.79	35,120.79	75,000.00	39,879.21	-	-	-	0.00
	Total Services and Supplies	**1,379,622.99**	**2,618,422.05**	**3,046,536.00**	428,113.95	**-**	**-**	**-**	0.00
5900	OTHER CAPITAL OUTLAY								
	TOTAL EXPENDITURES	**3,828,860.30**	**6,868,285.04**	**7,308,308.00**	**440,022.96**	**-**	**-**	**-**	**0.00**
	Ending Cash Balance*	**2,584,922.28**	**1,179,560.55**			113,015.98	113,015.98		
	*Outstanding Revenue Invoices not taken into consideration, See Appn Tabs								

286,178.54 Avg Monthly Expenditures

1,179,560.55 Projected Cash Ending Balance

4.12 Month Ending Balance