



Oregon Government Ethics Commission

Commission Meeting Materials

March 6, 2026

Public Session



OREGON GOVERNMENT ETHICS COMMISSION

Meeting Minutes

February 6, 2026

9:00 a.m.

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

Executive Director Susan Myers, Compliance & Enforcement Coordinator Casey Fenstermaker, Curriculum & Education Coordinator Stephanie Heffner, Senior Operations Mgr. Becky Maison, and Investigators Daniel Pacheco and Josh Sullivan were present in person. Trainers Chris Brubaker, Ruth Sylvester, and Lex Tingey and Admin Staff Molly Putnam and David Hunter were present via Teams.

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

Members of the Press, present via Teams: Dianne Lugo, Statesman Journal; Whitney Woodworth, Statesman Journal; Justin Alderman, Prineville Review; Crissy Ewald, Grants Pass Daily Courier; Shaanth Nonguneri, Oregon Capital Chronicle

(File 1)

Chair Payne called the meeting to order at 9:01 a.m. Roll call was completed by Chair Payne to confirm attendance of the Commissioners.

Public Session Item 1, Comments from the Chair. Chair Payne introduced Silas Patterson, the newest Investigator. Patterson commented that he was excited to be at the Oregon Government Ethics Commission. Payne stated that with every meeting there is an opportunity for Commissioners to think of ways to improve process within the Commission.

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

Public Session Item 3, Commissioner Helt stated she would like the minutes for January 9, 2026 to be updated on page 31 with regards to the lobbyist penalty waiver, as she did not mean that she does or does not support their mission but that the foster system is deplorable. Executive Director Myers stated that she could update the minutes as requested.

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Commissioner Thompson moved that the Commission approve the Meeting Minutes for December 12, 2025 meeting. Roll call was taken as follows: Helt, nay; McAuley, aye; Resendiz Gutierrez; aye; Thompson, aye; Burke, aye; Melter, aye; Payne, aye. Motion passed. 6-1.

Commissioner Thompson moved that the Commission approve the Meeting Minutes for January 9, 2026 meeting with Helt's requested changes. Roll call was taken as follows: Helt, aye; McAuley, aye; Resendiz Gutierrez; aye; Thompson, aye; Burke, aye; Melter, aye; Payne, aye. Motion passed. 7-0.

Curriculum & Training Coordinator Stephanie Heffner stated that all media were confirmed for the meeting, except for one but it appears that the one in question is not online.

Commissioner Resendiz Gutierrez declared a potential conflict of interest for Executive Session Items #24-31 as the entity is a client of his firm.

Commissioner Richard Burke declared a potential conflict of interest for Executive Session Item #32 and public session item #19, as he served as the Treasurer of the PAC for the campaign seeking to recall Claire Hall.

Chair Payne read the executive session script providing the statutory provisions for the executive sessions to discuss preliminary review.

The Commission convened into Executive Session at 9:13 a.m.
(File 2)

EXECUTIVE SESSIONS

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).

EXECUTIVE SESSION CONSENT CALENDAR

The following Public Meetings Law cases have been placed on the executive session consent calendar for dismissal, per ORS 192.685(3), as the complaints did not document that the mandatory grievance process had been satisfied.

None.

Reports of Preliminary Review

Facilitated by Investigators

Executive Session Item 1, 25-722ECF – Greg Smith, Columbia Development Authority (CDA)

Recommendation: Move to Dismiss

Investigator: Casey Fenstermaker

Respondent was not present. Investigator Fenstermaker summarized the preliminary review and the recommendation. It appears that Greg Smith did not violate the conflict of interest provisions of ORS 244 as he did not use the CDA attorney for personal use and the Bank of Eastern Oregon was not a business with which he was associated.

Commissioner Thompson moved that the Commission dismiss the complaint against Greg Smith. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed 7-0.

Executive Session Item 2, 25-728ECF – Jeff Wenholz, Columbia Development Authority

Recommendation: Move to Dismiss

Investigator: Casey Fenstermaker

Respondent was not present. Investigator Fenstermaker summarized the preliminary review and the recommendation. It appears that Jeff Wenholz did not violate the conflict of interest provisions of ORS 244 as he did not use the CDA attorney for personal use and the Bank of Eastern Oregon was not a business with which he was associated.

Commissioner Thompson moved that the Commission dismiss the complaint against Jeff Wenholz. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed 7-0.

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Executive Session Item 3, 25-730ECF – Joel Peterson, Columbia Development Authority

Recommendation: Move to investigate possible violations of ORS 244.060(3)
Recommendation: Move to Dismiss ORS 244.120(2) & ORS 244.040(1)
Investigator: Casey Fenstermaker

Respondent was not present. Investigator Fenstermaker summarized the preliminary review and the recommendations. As the Bank of Eastern Oregon is a business with which he is associated, Joel Peterson was met with potential conflicts of interest. It appears that Joel Peterson did adequately make disclosures of his potential conflicts of interest, as required by ORS 244.120(2)(a). Joel Peterson also did not use the CDA Attorney for personal legal advice and did not violate ORS 244.040. However, Fenstermaker noted that Peterson did not report the Bank of Eastern Oregon as a source of income on his 2025 Statement of Economic Interest.

Chair Payne confirmed with DOJ Counsel Brady that only one motion was required for the investigation of ORS 244.060(3) and the rest would be administratively dismissed.

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Joel Peterson may have violated ORS 244.060(3) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed 7-0.

Executive Session Item 4, 25-699EDP – Michelle Humble, Aviation Grant Review Committee

Recommendation: Move to Dismiss
Investigator: Daniel Pacheco

Respondent Michelle Humble was present via Teams. Investigator Pacheco summarized the complaint and recommendation. The Committee oversees a grant that benefits the Creswell Airport. It does not appear that Humble used her position to financially benefit her husband's business that uses the Creswell Airport. Humble addressed the Commission and stated the complainant is trying to weaponize agencies against the City of Creswell and harassing the city and its employees. Humble stated that the complaint process needs to be fixed as it is unfair for respondents.

Commissioners Resendiz-Gutierrez and Helt stated that they agree with the Respondent's statements. Commissioner Helt asked about free legal services for

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respondents. Chair Payne and Director Myers stated they were unaware of legal services for administrative complaints and there is no requirement for attorneys. Director Myers stated that those with attorneys have just as much likelihood to have their case dismissed as those that do not have an attorney. Commissioner Helt asked if OGEC has the recommendation or requirement of legal services in documentation. DOJ Counsel Brady advised that respondents do receive a notice that if and when a case moves to contested case it does provide them with the information for their rights to an attorney at that time.

Chair Payne stated that she is sympathetic to the stress that the process causes and doesn't want the agency to be weaponized. When complaints are received, complaints are treated the same unless they are not within OGEC's jurisdiction. Commissioner Helt asked if notices could be sent to the Commission as well. Director Myers stated a sample notice could be sent to the Commissioners.

Commissioner Thompson moved that the Commission dismiss the complaint against Michelle Humble. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed 7-0.

Executive Session Item 5, 25-707EDP – Kyle Bushman, Airport Commission Recommendation: Move to Investigate Possible Violations of ORS 244.040(1) & ORS 244.120(2)
Investigator: Daniel Pacheco

Respondent Kyle Bushman was present via Teams. Investigator Pacheco summarized the complaint and the recommendation. Bushman used parking tie-downs at the Airport. As a member of the Airport Commission, he was involved in the policy for Airport parking. It appears that he had a potential conflict of interest that he did not declare while discussing and voting on parking matters at the Airport.

Bushman addressed the Commission and identified his history and deep ties with the Creswell Airport. He stated that when he joined the Airport Commission, there was no education. He stated the Business Manager for the City wrote the policy and the Airport Commission was there to discuss it but did not vote on the policy. He explained the complainant is filing complaints against the city.

Commissioner Helt asked if the Airport Commission votes. Bushman stated that the Airport Commission does not vote. Commissioner Helt asked if there was a time to declare a conflict. Bushman stated that they did not know about conflicts so the agenda was not set up for declarations, so they are currently changing

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their process. Commissioner Helt asked about the tie down process and fees and the procedure. Bushman stated the Airport Commission gets in a room with the Business Manager and talks about things in place, so that the Business Manager and City Council have their perspectives. He stated they are an Advisory Board.

Chair Payne asked in a situation where they are not voting but they are making recommendations, whether members are still required to make declarations. DOJ Counsel stated yes. Chair Payne stated that it sounds like almost all of the members would have a conflict. Director Myers stated it would appear that way, but the minimum vote requirement would allow them to still vote in that case. Bushman stated that the meetings have been run this way for years and is concerned that the Complainant will go back for years, based on today. Chair Payne advised there is a time limit on complaints for OGEC and advised the education is a primary mission of OGEC.

Commissioner Helt asked what would happen as it appears everyone has conflicts. Director Myers stated everything is fact-specific and would need to determine if it is actual or potential. If it is potential, a declaration is required but then discussions can occur. If it is actual, then a declaration is required and then some of the governing body would be able to vote, per the minimum vote requirement. Director Myers recommended training and contacting OGEC staff for additional support and guidance.

Commissioner McAuley moved that the Commission find there is a substantial, objective basis for believing that Kyle Bushman may have violated ORS 244.040(1) & ORS 244.120(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, nay; Helt, nay; McAuley, aye; Thompson, nay; Burke, nay; Payne, aye. Motion failed 3-4.

Payne explained that as the motion failed, the case is administratively dismissed. We still recommended additional training.

Executive Session Item 6, 25-708ECF – Matt Scarfo, Union County
Recommendation: Move to Investigate Possible Violations of ORS 244.040(1) and ORS 244.120(2)
Investigator: Casey Fenstermaker

Respondent Matt Scarfo was present via Teams. Investigator Fenstermaker summarized the case and the recommendation to move to investigation. Fenstermaker advised that Scarfo used the County Attorney to assist in legal

matters and voted on a matter, to file a petition for validation, without declaring his conflict of interest.

Scarfo addressed the Commission and stated he hopes the Commission will dismiss the complaint. He stated the Clerk asked about a term limit opinion in 2018 and it was that opinion that sparked the discussion. He stated that he did not use County Counsel for personal use.

Commissioner Thompson stated it appears there is a need for clarification on dates and times and that an investigation would help clear that up. Chair Payne stated that an investigation would be helpful to determine what happened with regards to declarations of conflicts and use of office.

Commissioner McAuley moved that the Commission find there is a substantial, objective basis for believing that Matt Scarfo may have violated ORS 244.040(1) and ORS 244.120(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 7, 25-729EJS – Dann Cutter, City of Waldport

Recommendation: Move to Dismiss

Investigator: Josh Sullivan

Respondent Dann Cutter was not present. Investigator Sullivan summarized the case and the recommendation to dismiss. The complaint stated that Cutter used the City of Waldport's attorney for personal use with regards to a restraining order. Sullivan confirmed that his contract includes the use of legal services if the legal matter occurs with regards to his official duties.

Commissioner Thompson moved that the Commission dismiss the complaint against Dann Cutter. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed 7-0.

City of Waldport

Executive Session Item 8, 25-733XJS – Heide Lambert, City of Waldport

Executive Session Item 9, 25-741XJS – Michelle Severson, City of Waldport

Executive Session Item 10, 25-742XJS – Susan Woodruff, City of Waldport

Executive Session Item 11, 25-743XJS – Jayme Morris, City of Waldport

Executive Session Item 12, 25-744XJS – Richard Booth, City of Waldport

Executive Session Item 13, 25-745XJS – Gerald Townsend, City of Waldport

Executive Session Item 14, Gregory Dunn, City of Waldport

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Recommendation: Move to Dismiss
Investigator: Josh Sullivan

Respondents were not present. Investigator Sullivan summarized the cases and recommendations to dismiss. Sullivan stated Lambert alleged that it appeared the City Council exceeded the scope of the executive session provisions. Sullivan stated the minutes of the executive session show that whenever Lambert strayed from the topic, the discussion was redirected back to the appropriate topic, thus the recommendation is to dismiss.

Commissioner Thompson moved that the Commission dismiss the complaints against Heide Lambert, Michelle Severson, Susan Woodruff, Jayme Morris, Richard Booth, Gerald Townsend, and Gregory Dunn. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, aye; Payne, aye. Motion passed 7-0.

Blue River Water District

Executive Session Item 15, 25-718PJS – Jim Parks, Blue River Water District

Executive Session Item 16, 25-719PJS – Shanon Goodpasture-Lehr, Blue River Water District

Executive Session Item 17, 25-720PJS – Antony Abel, Blue River Water District

Executive Session Item 18, 25-726PJS – Joshua Cloke, Blue River Water District

Recommendation: Move to Dismiss
Investigator: Josh Sullivan

Respondents were not present. Investigator Sullivan summarized the cases and the recommendations to dismiss. The complaint alleged violated Public Meetings Law by failing to properly notice meetings. Sullivan confirmed that the Board did not appear to hold meetings on the alleged days, thus the Board did not violate Public Meetings Law.

Commissioner Thompson moved that the Commission dismiss the complaints against Jim Parks, Shanon Goodpasture-Lehr, Antony Abel, and Joshua Cloke. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, aye; Payne, aye. Motion passed 7-0.

City of Shady Cove

Executive Session Item 22, 25-736PSM – Kathy Nuckles, City of Shady Cove

Executive Session Item 23, 25-737PSM – Jeffrey Vanier, City of Shady Cove

Recommendation: Move to Dismiss

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Investigator: Casey Fenstermaker

Respondents were not present. Investigator Fenstermaker summarized the cases and the recommendation to dismiss. Fenstermaker advised that the two Councilors were not a part of the Council at the time of the meetings in question.

Commissioner Thompson moved that the Commission dismiss the complaints against Kathy Nuckles and Jeffrey Vanier. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, aye; Payne, aye. Motion passed 7-0.

City of Shady Cove

Executive Session Item 19, 25-727PSM – Lena Richardson, City of Shady Cove

Executive Session Item 20, 25-731PSM – Steve Mitchell, City of Shady Cove

Executive Session Item 21, Paige Winfrey, City of Shady Cove

Recommendation: Move to Investigate Possible Violations of ORS 192.660

Investigator: Casey Fenstermaker

Respondents Lena Richardson, Steve Mitchell, and Paige Winfrey were present via the telephone. Investigator Fenstermaker summarized the cases and the recommendations to move to investigation. Fenstermaker stated the complaint alleged the Council violated Public Meetings Law when a decision was made in executive session on October 15, 2025. There was a meeting held on October 15, 2025 where a consensus was made to put the City Manager on leave. The Council also received and reviewed resumes during the October 15 meeting. The City Manager received a call that night, along with the City Attorney. The City Manager picked up her things and dropped off her key the next day. This indicates that a decision was made on October 15, 2025 to put the City Manager on leave.

Respondent Richardson stated the Commission's report is wrong and that on October 15, 2025, they reviewed client/attorney confidential materials and a consensus was made. She stated she does not know why Ms. Winfrey asked for the City Manager's keys and phone on the morning of October 16, 2025.

Respondent Mitchell stated that he has been on the Council for 9 years. He stated he can't comment on the executive session on October 15, 2025. He stated there was no discussion when they received resumes of City Managers on October 15, 2025. He stated the statements by Winfrey are not correct.

Respondent Winfrey stated that she was surprised when they pulled out and discussed the resumes during the October 15 meeting. She stated that the Mayor stated during the meeting that she had gone over financials with the candidates already and she would not be offering more than the current City Manager. Winfrey stated she was asked to be the buffer between the City Manager and City Hall and she was told to meet the City Manager and pick up her things, which was arranged by the City Attorney. Winfrey stated her statement was factual and true and she made notes immediately afterwards because she felt so odd about it.

Commissioner Thompson stated there are some date issues and conflicting accounts to resolve and recommends moving forward. Chair Payne stated that she concurs. Commissioner Helt asked if it was allowed to discuss resumes under executive session. Fenstermaker explained that the provision cited was for client/attorney privilege. Resumes are not considered confidential client/attorney information. Investigator Fenstermaker stated that in investigation, she would seek to speak with the former City Manager and clarify the conflicting details.

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Lena Richardson may have violated ORS 192.660 and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 7-0.

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Steve Mitchell may have violated ORS 192.660 and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 7-0.

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Paige Winfrey may have violated ORS 192.660 and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, aye; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 7-0.

The Commission recessed for a break from 10:45 a.m. to 10:55 a.m.

Lincoln County Board of Commissioners

Executive Session Item 32, 25-710PCF – Claire Hall, Lincoln County

Executive Session Item 33, 25-711PCF – Casey Miller, Lincoln County

Executive Session Item 34, 25-712PCF – Walter Chuck, Lincoln County

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Recommendation: Move to Dismiss
Investigator: Casey Fenstermaker

Respondents were not present. Investigator Fenstermaker summarized the cases and the recommendations to dismiss. Fenstermaker advised that an action taken to exclude a person from a meeting was from the acting County Administrator and not the Board of Commissioners. Thus, the Board of Commissioners did not violate Public Meetings Law or vote to exclude a person from the meeting.

Chair Payne and Director Myers discussed the impact of a letter sent from staff. Commissioner Helt asked about the death of Claire Hall and why the case was not automatically administratively closed. Fenstermaker explained statutory deadlines and that the recommendation to dismiss the case on its merits is to help provide the community closure. Chair Payne stated it is more appropriate to administratively dismiss the case on Claire Hall than to dismiss the case on its merits.

Commissioner Thompson moved that the Commission administratively dismiss the complaint against Claire Hall. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, abstain; Resendiz Gutierrez, aye; Payne, aye. Motion passed 6-0, 1 abstention.

Commissioner Thompson moved that the Commission dismiss the complaints against Casey Miller and Walter Chuck. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, aye; Payne, aye. Motion passed 7-0.

Lane Community College (LCC)

Executive Session Item 25, 25-700PCF – Julie Weismann, LCC

Recommendation: Move to Investigate Possible Violations of ORS 192.630(1) and ORS 192.630(2)

Respondent Weismann was present via Teams. Investigator Fenstermaker summarized the case and the recommendation to move to investigate as it appears the respondent was involved in serial communications. The Board Members were included in an email from the President of LCC that summarized multiple board meetings, which included a quorum, which indicates a possible violation of Public Meetings Law.

Commissioner Thompson asked a question about the email that included a statement about engaging in a dialogue of matters that would go in front of the Board, such as budget cuts. Fenstermaker stated additional information and research is needed regarding the possible dialogue and email communication.

Respondent Weismann stated that she did not realize the email communications were part of the alleged serial communications and alleged Public Meetings Law violations. She stated that the President had put together a presentation for the Board. She stated that the Chair had concerns about the email communications but did not raise those concerns to the Board. She stated that the President and the Chair had the authority to stop the process.

Staff explained to Weissman that she will be removed from the executive session and then re-added when it is time to vote on her matter.

Executive Session Item 29, 25-704PCF – Kevin Alltucker, LCC
Recommendation: Move to Investigate Possible Violations of ORS 192.630(1) and ORS 192.630(2)

Respondent Alltucker was present via Teams. Investigator Fenstermaker summarized the cases and the recommendations to move to investigation. Fenstermaker explained that the Board appears to have violated Public Meetings Law when they were involved in a serial communication via email when the President of LCC sent an email to a quorum of the Board Members that requested a dialogue on matters in front of the Board.

Alltucker addressed the Commission and stated that he would like to provide factual context. He stated the President offered meetings for the Board to gain budget information, none of which was new. He stated Chair Fölnagy filed a complaint about the meetings and then chose to attend one himself. He stated that Mulholland has previously been censured for comments towards the President and he is concerned that the cases against the Board may be considered retaliation against the President.

Commissioner Helt asked if the meetings were publicly noticed. Alltucker stated he was unsure. Commissioner Helt asked if there was a value in the meetings. Alltucker stated that he can only speak towards his meeting and that the information was previously received and he was interested because he wanted to see if the meeting would generate additional questions.

Staff explained to Alltucker that he will be removed from the executive session and then re-added when it is time to vote on his matter.

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Commissioner Helt asked if someone is engaged in a serial meeting via email, how does one proceed and how does one opt out. DOJ Brady explained it depends on the content of the emails, how one responds, etc. and that it depends on an individual basis and that is for the Commission to determine each time.

Executive Session Item 24, 25-697PCF – Austin Fölnagy, LCC

Executive Session Item 26, 25-701PCF – Zachary Mulholland, LCC

Executive Session Item 27, 25-702PCF – Jerry Rust, LCC

Executive Session Item 28, 25-703PCF – Steve Mital, LCC

Executive Session Item 30, 25-705PCF – Jesse Maldonado, LCC

Recommendation: Move to Investigate Possible Violations of ORS 192.630(1) and ORS 192.630(2)

Investigator: Casey Fenstermaker

Respondents Austin Fölnagy, Zachary Mulholland, Jerry Rust, and Steve Mital were present via Teams. Respondent Jesse Maldonado was not present. Investigator Fenstermaker summarized the cases and the recommendation to move to investigate as it appears the Board may have violated Public Meetings Law by participating in a serial communication via email from the President to all board members (a quorum) encouraging dialogue.

Respondent Fölnagy addressed the Commission and stated that he has served on multiple community college boards. He stated that Lane is one of the largest Community Colleges in Oregon and the college provides Public Meetings Law trainings for the Board members. He stated that he has shared his concerns with the Board multiple times and was treated poorly by the Board after he filed his complaint, including being asked to retract the complaint. He stated that he recommends following the staff's recommendation.

Respondent Mulholland addressed the Commission and stated that he appreciates OGEC looking into the issue. He stated he has sent his concerns to Fölnagy, especially concerning cuts and changes in the budget.

Respondent Mital addressed the Commission and stated that he had concerns about the preliminary review report and his attendance at meetings. Mital noted that Investigator Fenstermaker noted that Mital was not at the meetings. Mital stated that he was not expecting to hear the Board Chair's concerns about how the Board was treating him after he filed the complaint. He stated that he was confused on the complaint originally and thought it was filed on the President, not the Board which is why the Board requested that Fölnagy retract his complaint.

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Commissioner Helt asked Mital how he reacted to the email from the President. Mital stated he would have to go back and review his emails but does remember saying that he would like to get more information and like the opportunity. Commissioner Thompson stated that he has a lot of questions and would benefit greatly from additional information. He would like to flag the email from the President that mentions engaging in dialogue. Chair Payne echoed Commissioner Thompson's statements.

Respondent Rust addressed the Commission and stated that he was new to the Board and sent an email to the Board and President that he did not like how the Board was preceding. He stated that he cited a certain case (Handy) and he also witnessed poor treatment of the Board Chair when the Chair expressed his concerns.

Commissioner Helt stated that she was interested on how Board members responded to the President's email.

Executive Session Item 24, 25-697PCF – Austin Fölnagy, LCC

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Austin Fölnagy may have violated ORS 192.630(1) and ORS 192.630(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, abstain; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 6-0,1 abstention.

Executive Session Item 26, 25-701PCF – Zachary Mulholland, LCC

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Zachary Mulholland may have violated ORS 192.630(1) and ORS 192.630(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, abstain; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 6-0,1 abstention.

Executive Session Item 27, 25-702PCF – Jerry Rust, LCC

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Jerry Rust may have violated ORS 192.630(1) and ORS 192.630(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, abstain; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 6-0,1 abstention.

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Executive Session Item 28, 25-703PCF – Steve Mital, LCC

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Steve Mital may have violated ORS 192.630(1) and ORS 192.630(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, abstain; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 6-0,1 abstention.

Executive Session Item 30, 25-705PCF – Jesse Maldonado, LCC

Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Jesse Maldonado may have violated ORS 192.630(1) and ORS 192.630(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, abstain; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 6-0,1 abstention.

Executive Session Item 25, 25-700PCF – Julie Weismann, LCC

Respondent Julie Weismann rejoined the meeting and was present via Teams. Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Julie Weismann may have violated ORS 192.630(1) and ORS 192.630(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, abstain; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 6-0,1 abstention.

Executive Session Item 29, 25-704PCF – Kevin Alltucker, LCC

Respondent Kevin Alltucker rejoined the meeting and was present via Teams. Commissioner Thompson moved that the Commission find there is a substantial, objective basis for believing that Kevin Alltucker may have violated ORS 192.630(1) and ORS 192.630(2) and that the Commission should investigate accordingly. Roll call was taken as follows: Resendiz Gutierrez, abstain; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 6-0,1 abstention.

Lane Community College (LCC)

Executive Session Item 31, 25-706PCF – Amelia Hampton, LCC

Recommendation: Move to Dismiss

Investigator: Casey Fenstermaker

Respondent was not present. Investigator Fenstermaker summarized the case and the recommendation to dismiss the complaint as the respondent is a student and based on LCC's policy does not count towards a quorum of the Board.

Commissioner Thompson moved that the Commission dismiss the case against Amelia Hampton. Roll call was taken as follows: Resendiz Gutierrez, abstain; Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Payne, aye. Motion passed. 6-0, 1 abstention.

Own Motion Preliminary Reviews

None.

Other Items

None.

Reconvene Regular Open Session

The Commission recessed for a break from 12:12 p.m. - 12:24 p.m.
The Commission adjourned the Executive Session at 12:24 p.m.

(File 3)

Reconvene Regular Open Session

The Commission reconvened Public Session at approximately 12:24 p.m.

CONSENT CALENDAR

Recommendation: Letters of Education

Lobbyist Penalty Correspondence

Public Session Item 4, Sybil Ackerman-Munson; 2025 Q4, \$50

Public Session Item 5, John Calhoun; 2025 Q4, \$40

Public Session Item 6, Harris Qureshi; 2025 Q4, \$30

Lobbyist Client Penalty Correspondence

Public Session Item 7, City of Milton-Freewater; 2025 Q4, \$50

Public Session Item 8, Oregon Mining Association; 2025 Q4, \$50

Statement of Economic Interest Penalty Correspondence

None.

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Commissioner Thompson moved that the Commission approve the Consent Calendar as presented. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, no response; Payne, aye. Motion passed 6-0.

End of Consent Calendar

Lobbyist Penalty Reductions *Presented by Executive Director*

Public Session Item 9, Rory Steele; Rec: 2025 Q3, Letter of Education; 2025 Q4, \$35

Director Myers summarized the recommendation.

Commissioner Thompson moved that the Commission approve the recommended filing penalty reduction as presented. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, no response; Payne, aye. Motion passed 6-0.

Public Session Item 10, Turo Inc.; Rec: 2023 Q3, Letter of Education; 2025 Q4, \$15; 2024 Q3 \$1,500 reduction, \$3,500 penalty

Director Myers explained the staff recommendation and noted the reduction was \$1,500 but the recommended penalty amount was \$3,500.

Commissioner Thompson moved that the Commission approve the recommended filing penalty reduction as presented. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, aye; Payne, aye. Motion passed 7-0.

Statement of Economic Interest Penalty Reductions None.

STIPULATED FINAL ORDERS – Consent Calendar **Recommendation:** Letter of Education

Public Session Item 11, 24-461XJS – Roak TenEyck, City of Umatilla

Public Session Item 12, 24-624XDP – Roak TenEyck, City of Umatilla

Public Session Item 13, 25-161EAM – Erin Kilcullen, Deschutes County Soil & Water Conservation District

Public Session Item 14, 25-425EJS – Archie Garrett, City of Bendon

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

End of Consent Calendar

STIPULATED FINAL ORDERS

Civil Penalties

Public Session Item 15, 25-333EDP – Colin Vurek, Lane Community College
Recommendation: \$3,000 Penalty
Investigator: Daniel Pacheco

Respondent Colin Vurek was present via telephone. Investigator Pacheco summarized the case and the Stipulated Final Order. Pacheco stated that it appears that Vurek may have used her position for financial gain as a student had done labor on behalf of Vurek. Pacheco advised that Vurek has agreed to and signed the Stipulated Final Order and agreed to pay the penalty of \$3,000.

Commissioner Thompson moved that the Commission approve the proposed Stipulated Final Order as the final order and that the chairperson be authorized to sign it as such. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, aye; Payne, aye. Motion passed 7-0.

Public Session Item 16, 25-324EAM – Jamee Millard, Oregon Department of Forestry
Recommendation: \$1,000 Penalty
Investigator: Casey Fenstermaker

Respondent was not present. Investigator Fenstermaker summarized the case and the Stipulated Final Order. Fenstermaker stated that Millard utilized a state car for commuting purposes for approximately 30 days and has signed the Stipulated Final Order, agreeing to pay a penalty of \$1,000. Fenstermaker advised that the penalty is similar to that of other cases.

Commissioner Helt asked for clarification regarding OGEC's jurisdiction. Director Myers clarified that OGEC has jurisdiction over all 260,000 public officials for Oregon Ethics Law complaints.

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Commissioner Thompson moved that the Commission approve the proposed Stipulated Final Order as the final order and that the chairperson be authorized to sign it as such. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, aye; Payne, aye. Motion passed 7-0.

DEFAULT FINAL ORDERS

Public Session Item 17, Removed from Agenda

Director Myers explained the matter was removed from the agenda due to an abundance of caution with a technical, procedure matter.

REPORTS OF INVESTIGATIONS – Consent Calendar

None.

REPORTS OF INVESTIGATIONS

Public Session Item 18, 25-465EJS – Karl Nulton, Three Sisters Irrigation District

Recommendation: Move to Dismiss

Investigator: Josh Sullivan

Respondent Karl Nulton was present via telephone. Investigator Sullivan summarized the case and the recommendation to dismiss. Sullivan stated that he was able to confirm that Karl Nulton did not request to keep his water on and that Karl Nulton paid all relevant penalties that the Irrigation District charged. Respondent Nulton stated that he appreciated the results and the recommendation.

Commissioner Thompson moved that the Commission dismiss the complaint against Karl Nulton. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, aye; Resendiz Gutierrez, aye; Payne, aye. Motion passed 7-0.

Public Session Item 19, 25-423PCF – Claire Hall, Lincoln County

Recommendation: Move to Administratively Close

Investigator: Casey Fenstermaker

Investigator Fenstermaker summarized the recommendation to administratively close the case due to Claire Hall's death. Commissioner Helt wanted to extend words of support and sympathy to friends and family of Claire Hall.

Commissioner Burke echoed those words of compassion but abstained from

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voting on the matter.

Commissioner Thompson moved that the Commission administratively close the complaint against Claire Hall. Roll call was taken as follows: Metler, aye; Helt, aye; McAuley, aye; Thompson, aye; Burke, abstain; Resendiz Gutierrez, aye; Payne, aye. Motion passed 6-0, 1 abstention.

OPINIONS, ADVICE, AND CORRESPONDENCE

Advisory Opinions

Facilitated by Staff

None.

Staff Opinions

None.

Staff Advice – Informational Letters

Public Session Item 20, 26-008I – Sen. Janeen Sollman, Oregon Legislative Assembly

Re: Travel expenses under gift exception in ORS 244.020(7)(b)(F)

Public Session Item 21, 26-016I – Rep. Paul Evans, Oregon Legislative Assembly

Re: Private employment and prohibitions in ORS 244

Public Meetings Law Training Approval Letters

None.

Other Correspondence

None.

Miscellaneous Items

Facilitated by Staff

Public Session Item 22, Trainers' Report

Curriculum & Training Coordinator Stephanie Heffner summarized the training activities from the last trainer's report and provided additional information summarizing 2025 data.

Public Session Item 23, Executive Director's Report

Director Myers summarized agency activities from the last director's report. She thanked staff for stepping up while she was out sick.

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Director Myers explained the process for Public Meetings Law cases and how some public officials opt to hear their cases together and some choose to hear their cases separately.

Director Myers noted that there are several bills before the Legislature that impact OGEAC, and that we would send them the bills or a link to them. She noted that she has some concerns regarding HB 4177, a bill relating to the Public Meetings Laws.

Commissioner Helt asked why the Commission does not oppose bills, if the Commission is unhappy with those bills. Director Myers explained that an agency's stance is determined by the Governor's Office, but an agency can provide factual information on the effect of bills.

The Commission adjourned the meeting at approximately 1.p.m.
The next regularly scheduled Commission meeting will be March 6, 2026, at 3218 Pringle Road SE, Suite 220, Large Conference Room, Floor 2, Salem, Oregon 97302.

From: [Kosai, Kendall](#)
To: [HUNTER David * OGEC](#)
Subject: Anti-Defamation League Late Filing
Date: Tuesday, January 27, 2026 10:20:36 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

You don't often get email from kkosai@adl.org. [Learn why this is important](#)

Hi David,

Great to speak with you on the phone today. Again, I deeply apologize for the tardy response regarding our filing. Our previous contact has since left the organization and we were unaware of the notifications. Per our conversation, we have updated the information to a current contact information. We hope that the Commission will consider waiving the late fee.

Please let me know if you have any questions.

Thank you again,

Kendall

Kendall T. Kosai
Director of Policy, Western Division
(Pronouns He/Him)

Anti-Defamation League
Cell: 206-348-2100
kkosai@adl.org
www.adl.org

Past Violations: None

Current Penalties: 2025 Q4, \$120

Recommendation: 1st violation - Letter of Education

SM



From: [HUNTER David * OGEC](#) on behalf of [Mail * OGEC](#)
To: [HUNTER David * OGEC](#)
Subject: FW: Failure to File Quarterly Report
Date: Tuesday, January 27, 2026 3:50:54 PM

From: Kathy Woosley <KWoosley@cascade-locks.or.us>
Sent: Monday, January 26, 2026 1:32 PM
To: Mail * OGEC <Mail@ogec.oregon.gov>
Subject: Re: Failure to File Quarterly Report

Hi David,
Thank you so much for your assistance in filing this report.

Our City Administrator's last day of work was January 6th, which was sudden. I have had his emails forwarded to me and I'm trying to get through his and my email.

I would like to ask the Commission for a waiver of the fees associated with this late filing.

Thank you!

Kathy Woosley, MMC
Administrative Services Director
PO Box 308
Cascade Locks, OR 97014
www.cascade-locks.or.us

From: Kathy Woosley <KWoosley@cascade-locks.or.us>
Sent: Wednesday, January 21, 2026 8:36 AM
To: Mail * OGEC <mail@ogec.oregon.gov>
Subject: Fw: Failure to File Quarterly Report

Hi,
City Administrator Bennett is no longer with the City. I don't know what report is supposed to be filed. Can you send me a copy of what had recently been sent so that I can try to figure it out?

Thank you.

Kathy Woosley, MMC
Administrative Services Director
PO Box 308
Cascade Locks, OR 97014

Past Violations: None

Current Penalties: 2025 Q4, \$110

Recommendation: 1st violation *SM*
- Letter of Education

From: [Richard Freimark](#)
To: [Mail * OGEC](#)
Subject: Fwd: Late Filing
Date: Wednesday, February 18, 2026 11:49:56 AM

You don't often get email from richard@flmqof.com. [Learn why this is important](#)

----- Forwarded message -----

From: **Richard Freimark** <richard@flmqof.com>
Date: Wed, Feb 18, 2026 at 11:37 AM
Subject: Late Filing
To: <ogec.mail@oregon.gov>

Dear Commissioner,

I attempted to file in December and even called the OGEC office because I was unable to file through your portal at that time. I was told I had to wait until January to file, and that is where the problem arose.

Since August 29, 2025, I have been spending 15 hours a week (Monday, Wednesday, Friday) receiving dialysis in Beaverton and have not been able to stay on top of filings.

Although we have a wonderful lobbyist, our group has no funding and has not been using his services for several reporting cycles.

I was late, but your system would not allow early filing. January slipped by, and I was not overly concerned because I was focused on my health and our firm had not actively been using our lobbyist throughout 2025, as shown in the previous three reports.

Sincerely,

Richard Freimark
[[SEP]]Managing Member[[SEP]]
+1 503-539-0771
Richard@FLMQOF.com

Past Violations: None

Current Penalties: 2025 Q4, \$40

Recommendation: 1st violation - Letter of Education

SM

From: [FOSTER Jessica * OGEC](#) on behalf of [Mail * OGEC](#)
To: [HUNTER David * OGEC](#)
Subject: Penalty Waiver request
Date: Thursday, January 29, 2026 9:29:58 AM

Dear Commissioners,

I am writing on behalf of Flexible Finance, Inc. to provide a letter of explanation regarding the late filing of our 2025 Q4 quarterly report and to respectfully request a waiver of the associated \$140.00 penalty.

The late filing resulted from an internal administrative oversight following the departure of an employee at the end of 2025. During the offboarding process, responsibility for the Oregon Government Ethics Commission filing was not properly transitioned, which led to the missed reporting deadline. Once the issue was identified, the required report was promptly filed on January 29, 2026.

We take our compliance obligations seriously and regret this lapse. This was an isolated incident, and we have since updated our internal processes to ensure clear ownership and continuity for required filings during personnel transitions.

In light of our prior filing history, the administrative nature of the error, and the prompt corrective action taken, we respectfully request that the Commission consider waiving the penalty.

Thank you for your time and consideration.

-

Past Violations: None

Current Penalties: 2025 Q4 \$140

SM

Recommendation: 1st violation - Letter of Education



Oregon Government Ethics Commission
3218 Pringle Rd SE, Suite 220
Salem, OR 97302

Chair Payne and Commissioners:

My name is Emily Hughes. I hold an individual registered lobbyist account in Oregon, and am the responsible party for the Oregon Medical Examiners Association (OMEA) lobbyist client account, as well.

During the inception of OMEA a little over a year ago, one of the first actions I took was to ensure I was registered as a lobbyist, and my organization was registered as a client, with the State of Oregon. Unfortunately, my haste to ensure we were in compliance with state regulations ultimately put me out of compliance when the organization was put on an unexpected hold almost immediately. Due to both personal and professional circumstances (which I am happy to elaborate on if the Commission wishes), OMEA was out of mind almost as soon as it was registered. I want to make clear that the intent of this letter is to serve as an explanation, not an excuse. I was never physically unable to file the required quarterly reports. I simply, and honestly, never thought once about doing so.

I understand David Hunter tried diligently to get ahold of me regarding my accounts. I admittedly do not answer unknown numbers and delete the voicemails that follow, assuming (incorrectly, at times) that they are solicitations or scams. His e-mails were uncovered in an inbox with several thousand other unread e-mails. There was no lack of attempt by the Commission to contact me and inform me of the status of my accounts.

When I logged into my OGEC account to register for another entity at the beginning of this year, I was met with an alert to a viscerally staggering penalty. I do not deny that I did accrue the penalty I currently owe the Commission.

As I said, this letter is not an excuse, but rather an explanation, as to how my own human error and oversight resulted in an owed penalty that, if required to pay, will be prohibitive in my ability to earn income I require to pay the amount

itself. I am deeply embarrassed from both a personal and professional perspective, and sincerely apologetic for failing to comply with the requirements I was so eager to abide by.

I have filed all delinquent reports (as you can see, there was zero activity, as an individual or organization) and can guarantee that all future reports will be filed timely and properly. It is my humble request that I be allowed a penalty waiver or reduction on the basis that this is my first offense; there was absolutely zero activity as individual or organization that failed to go unreported; and I can assure the Commission the error will not be repeated.

I genuinely appreciate your consideration of my request,

Emily Hughes

Individual Registered Lobbyist

Responsible Party for the Oregon Medical Examiners Association

Past Violations: None

**Current Penalties: 2025 Q1, \$5,000; 2025 Q2, \$5,000;
2025 Q3, \$4,550; 2025 Q4, \$450**

**Recommendation: 2025 Q1 - 1st violation - Letter of Education
2025 Q2 - 2nd violation - reduction to \$500 (10%)
2025 Q3 - 3rd violation - reduction to \$1,137 (25%) SM
2025 Q4 - 4th violation - no reduction - \$450**



Oregon Government Ethics Commission
3218 Pringle Rd SE, Suite 220
Salem, OR 97302

Chair Payne and Commissioners:

My name is Emily Hughes. I hold an individual registered lobbyist account in Oregon, and am the responsible party for the Oregon Medical Examiners Association (OMEA) lobbyist client account, as well.

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itself. I am deeply embarrassed from both a personal and professional perspective, and sincerely apologetic for failing to comply with the requirements I was so eager to abide by.

I have filed all delinquent reports (as you can see, there was zero activity, as an individual or organization) and can guarantee that all future reports will be filed timely and properly. It is my humble request that I be allowed a penalty waiver or reduction on the basis that this is my first offense; there was absolutely zero activity as individual or organization that failed to go unreported; and I can assure the Commission the error will not be repeated.

I genuinely appreciate your consideration of my request,

Emily Hughes

Individual Registered Lobbyist

Responsible Party for the Oregon Medical Examiners Association

Past Violations: None

Current Penalties: 2025 Q1, \$5,000; 2025 Q2, \$5,000; 2025 Q3, \$4,550; 2025 Q4, \$110

**Recommendation: 2025 Q1 - 1st violation - Letter of Education
2025 Q2 - 2nd violation - reduction to \$500 (10%)
2025 Q3 - 3rd violation - reduction to \$1,137 (25%) *SM*
2025 Q4 - 4th violation - reduction to \$75**

From: [Jimmy Sheppard](#)
To: [HUNTER David * OGEC](#)
Subject: Pearson <> Filing Fee Request
Date: Monday, February 9, 2026 1:21:05 PM

You don't often get email from jimmy.sheppard@pearson.com. [Learn why this is important](#)

Dear Commissioners,

I wanted to express my gratitude for the professionalism and assistance your staff has provided in resolving our recent matter. I am writing to address a delay in filing and late fee associated with it which was caused in part due to the unfortunate departure of key personnel who are no longer with Pearson.

As soon as we were made aware of the issue, we promptly reached out to your office to notify you of the situation and to seek guidance on the necessary steps to file the required documents, providing a detailed explanation of the circumstances surrounding the delay and the departure of key personnel from Pearson.

Throughout this process, we will maintained open communication with your team, promptly addressing any questions or concerns that arise. Additionally, we are implementing better internal measures to prevent such issues from recurring, including revising our workflows and designating a dedicated individual to handle similar matters in the future.

Given these circumstances, we would respectfully request that the associated fees be waived or reduced. Any consideration you can extend in this matter would be greatly appreciated.

Thank you again for your understanding.

Best,

Jimmy Sheppard, J.D.
Senior Lead, U.S. Government Relations

Colorado Springs, CO | MST
Office Hours: 9 am – 5 pm

(M) 719.726.1140
Jimmy.Sheppard@pearson.com

Past Violations: 2024 Q1, Letter of Education

Current Penalties: 2025 Q4, \$650

SM

Recommendation: 2nd violation - reduction to \$65

Learn more at [pearson.com](https://www.pearson.com)

BEFORE THE OREGON GOVERNMENT ETHICS COMMISSION

In the Matter of)
)
Nikki Wood)
)
_____)
)

STIPULATED FINAL ORDER
CASE NO. 25-221ELG

1. **PURPOSE:** The purpose of this stipulated final order is to settle any and all claims, allegations and charges by the Oregon Government Ethics Commission (Commission) in the above referenced case against Nikki Wood.

2. **JURISDICTION:** At all material times, Nikki Wood was the elected Mayor for the City of Lakeside (City) City Council (Council). As such, she was a public official subject to the jurisdiction of the Commission pursuant to ORS Chapter 244.

3. **STIPULATED FACTS:**
 - A. From December 2024 through May 2025, Nikki Wood participated in a series of meetings where the Council discussed and considered bids for a City Senior Center Project (Project) and the 2024-2025 fiscal budget. One of the two bids submitted for consideration of the Project was from M. Armstrong Construction (Armstrong Construction), a business owned by Mike and Tristyn Armstrong, parents of Nikki Wood.

 - B. On September 19, 2025, Mike and Tristyn Armstrong emailed the City Manager, Sharon Barker, to formally withdraw their bid for the Project.

 - C. A public official is met with a conflict of interest when, acting in their official capacity, they participate in any action, decision, or recommendation 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 public official, their relative, or any business with which they are associated.
[ORS 244.020(1) and (13)].

- D. When met with a conflict of interest, an elected public official, such as Nikki Wood, must make a public announcement of the nature of their conflict of interest. Then, if it is a potential conflict of interest, after making the public announcement, they may continue to participate and may vote on the matter. If it is an actual conflict of interest, after making the public announcement, they must refrain from any participation in the matter, unless their vote is needed to meet a minimum vote requirement, in which case they may vote but may not participate in any discussion or debate on the matter. [ORS 244.120(2)].
- E. Mike and Tristyn Armstrong, as Ms. Wood's parents, are relatives of Ms. Wood, as defined in ORS 244.020(16)(a). As the relatives of Nikki Wood are the owners of Armstrong Construction, a business per ORS 244.020(2), it is a business with which she is associated. [ORS 244.020(3)]. As such, any decision, recommendation or action Ms. Wood took in her role as Mayor that would or could financially impact herself, her parents, or Armstrong Construction would give rise to a conflict of interest. Each time Ms. Wood was met with a statutory conflict of interest, she was required to declare the nature of her conflict of interest, and if it was an actual conflict of interest, she was required to refrain from participating in the matter. [ORS 244.120(2)].
- F. On December 23, 2024, the Council discussed the Project bid submitted by Armstrong Construction totaling \$26,022.50. When the Council moved to approve the bid from Armstrong Construction, Ms. Wood abstained from the vote but did not declare the nature of her actual conflict of interest. Later in the meeting, the Council voted to create a subcommittee (which would include Ms. Wood) that would meet with the bidders to have them sign the contracts. Ms. Wood participated in the vote to approve the motion and did not declare the nature of her actual conflict of interest.

- G. On December 26, 2024, the Council discussed the bids that had been approved at the December 23rd meeting. Nikki Wood participated in the discussions and recommended that the bids, which included that of Armstrong Construction, move forward for approval. When the Council voted to award the Project bid to Armstrong Construction, Ms. Wood abstained from the vote and acknowledged that she had a conflict of interest but did not state the nature of her actual conflict of interest.
- H. On April 21, 2025, City Budget Committee (Budget Committee) members, which included Ms. Wood, convened a meeting to discuss the 2024-2025 fiscal budget. During the meeting, the members discussed the City's budget which included funding that would be allocated to pay Armstrong Construction for the Project. During the discussions, Ms. Wood did not declare the nature of her potential conflict of interest.
- I. At the May 19, 2025, Council meeting, Nikki Wood introduced an agenda item concerning the City's contract with Armstrong Construction. Prior to the discussions concerning Armstrong Construction, Ms. Wood did not declare the nature of her potential conflict of interest.
- J. At the Council and Budget Committee meetings mentioned above, Nikki Wood was met with actual and potential conflicts of interest. At a number of these meetings, she did abstain from voting; however, she failed to adequately declare the nature of her conflict of interest as required by ORS 244.120(2). By failing to publicly announce the nature of her conflict of interest and refrain from voting when directed by statute, Ms. Wood violated ORS 244.120(2).
- K. The actions described in paragraphs 3(E), 3(F), 3(G) and 3(H) constitute one violation of ORS 244.120(2) with four equivalent actions.

- L. ORS 244.040(1) prohibits a public official from using or attempting to use the public official's position or office to obtain a financial benefit or avoid a financial detriment for the public official, the public official's relative or a business with which the public official or the official's relative is associated, if the financial benefit or avoidance of detriment would not otherwise be available but for the public official's holding the official position.
- M. On each of the instances described above, when the Council considered matters regarding Armstrong Construction, Ms. Wood violated ORS 244.040(1) by using her position to provide her parents and Armstrong Construction with financial benefits that would not otherwise be available but for her holding her position as a Council Member.
- N. The actions described in paragraph in 3(E), 3(F) and 3(H) constitute one violation of ORS 244.040(1) with three equivalent actions.
- O. The Commission contends that the results of the 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 244.040(1) with three equivalent actions and ORS 244.120(2) with four actions each.
- P. Nikki Wood asserts that she did not willfully or intentionally violate Oregon Government Ethics Law. Ms. Wood further contends that she did not use her position to attempt to obtain a financial gain for her relatives or Armstrong Construction and that she abstained from any Council action to approve, authorize, or discuss the contract for Armstrong Construction which was subsequently pulled from consideration in September of 2025. Notwithstanding these concerns, Ms. Wood agrees to the terms and conditions of this Stipulated Final Order to resolve the matter and bring this case to a close.

4. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. On July 11, 2025, the Commission considered information in the preliminary review phase of Case No. 25-221ELG and acted to find cause to initiate an investigation of this matter. Nikki Wood 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. ORS 244.350 authorizes the Commission to assess civil penalties of up to \$5,000 per violation for each of the violations described in paragraph 3(N).
- C. In lieu of a civil penalty, Nikki Wood 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, which have been or could be asserted against Nikki Wood within the scope of the above-referenced proceedings.
- E. Nikki Wood 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 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 this matter and shall be binding upon all parties.

By signing this agreement, Nikki Wood 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, Nikki Wood 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:

BB1501ECCB2543F

Respondent: Nikki Wood

January 29, 2026

Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

BEFORE THE OREGON GOVERNMENT ETHICS COMMISSION

In the Matter of)
)
) **STIPULATED FINAL ORDER**
)
 Sherrie Wilkins) **CASE NO. 25-607EDP**
)
)
 _____)

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 Sherrie Wilkins.

2. **JURISDICTION:**

A. Sherrie Wilkins is a Member of the North Gilliam County Health District (District) Board of Directors (Board). As such, she is a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law found in ORS Chapter 244.

B. On December 12, 2025, the Commission considered information in the preliminary review phase of Case No. 25-607EDP and acted to find cause to open an investigation of this matter.

3. **APPLICABLE LAW:**

A. ORS 244.040(16)(a) defines relative to include the spouse, parent, stepparent, child sibling, stepsibling, son-in-law or daughter-in-law of the public official.

- B. At the time relevant to this review, a conflict of interest meant any action, decision, or recommendation made 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, or a business with which they or their relative are associated. [ORS 244.020(1) and ORS 244.020(13)].

- C. When met with a conflict of interest, an elected public official, such as Sherrie Wilkins, must announce publicly 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 announcement must be made prior to any discussion of the matter and the public official must 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 District Board oversees the North Gilliam Medic Department (Medic Department) which provides emergency management services and employs several paid volunteers. One of these paid volunteers is Brian Wilkins, spouse of Sherrie Wilkins.

- B. The Board convened two meetings, one on July 15th and one on July 31st 2025, to consider and approve a “Settlement Agreement and Release of Wage Claims” (Settlement Agreements or EMS Back-Pay) which would compensate Medic Department staff for

time worked from January 1st through June 30, 2025. Additionally, at both meetings, the Board considered a policy (Policy or “EMS On Call Pay”), which moving forward, would prohibit overtime pay for Medic Department staff.

- C. As an employee of the Medic Department, Brian Wilkins was subject to the Policy and was eligible for \$1,782.38 in compensation as part of his Settlement Agreement.
- D. On July 15, 2025, following discussions of the Policy and Settlement Agreements, Sherrie Wilkins was elected to the District Board. On July 31, 2025, Ms. Wilkins and the other Members convened a special meeting and met in executive session to discuss and finalize the Policy and Settlement Agreements. After reconvening to the public portion of the meeting, the Board discussed and then voted to authorize the Policy and Settlement Agreements.
- E. Ms. Wilkins did not declare a conflict of interest prior to meeting in executive session to discuss and finalize the Policy and Settlement Agreements. Further, she did not abstain from the discussions or vote regarding the Policy and Settlement Agreements.

5. CONCLUSION/VIOLATION

- A. The actions described in paragraphs 4(D) constitute one violation of ORS 244.120(2) with one equivalent action. Because Sherrie Wilkins’ relative would, with certainty, be financially impacted by the adoption of the Policy and Settlement Agreements, Ms. Wilkins was met with an actual conflict of interest. As such, when the Board convened the executive session to discuss the Policy and

Settlement Agreements, Ms. Wilkins was required to publicly declare the nature of her conflict. When the Policy and Settlement Agreements were discussed and votes on, she was required to abstain from the discussions and vote. By failing to do so, Ms. Wilkins violated ORS 244.120(2) at the July 31st special meeting.

- 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) with one equivalent action.

6. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. Sherrie Wilkins has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigative phase.
- B. In lieu of a civil penalty, Sherrie Wilkins 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 which have been asserted by the Commission in the above-referenced case against Sherrie Wilkins.
- D. Sherrie Wilkins 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 the matter and shall be binding upon all parties.

By signing this agreement, Sherrie Wilkins 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, Sherrie Wilkins 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:

605E94BED4104C7...
Respondent: Sherrie Wilkins

January 28, 2026
Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

detriment of the person, their relative, or a business with which they or their relative are associated. [ORS 244.020(1) and ORS 244.020(13)].

- B. When met with a conflict of interest, an elected public official, such as Brian Foster, must announce publicly 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 announcement must be made prior to any discussion of the matter and the public official must 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 District Board oversees the North Gilliam Medic department (Medic Department) which provides emergency management services and employs several paid volunteers. As late as March 10, 2025, Brian Foster was a Medic Department employee. On July 15, 2025, Mr. Foster was elected to the District Board.
- B. The Board convened two meetings, one on July 15th and one on July 31st 2025, to consider and vote to approve a “Settlement Agreement and Release of Wage Claims” (Settlement Agreements or EMS Back-Pay) which would compensate Medic Department staff for time worked from January 1st through June 30, 2025. As a former Medic Department employee, Brian Foster was eligible for \$1,782.38 in compensation as part of his Settlement Agreement.

- C. At the July 15, 2025, regular meeting, after being sworn to the Board, Brian Foster and the Board Members convened an executive session to discuss the Settlement Agreements which included Mr. Foster's own Settlement Agreement. Prior to convening the executive session portion of the meeting, Mr. Foster did not publicly announce a conflict of interest.
- D. On July 31, 2025, Brian Foster and the Members, convened a special meeting and met in executive session to discuss and finalize the Settlement Agreements. After reconvening to the public portion of the meeting, the Board discussed and voted to authorize Settlement Agreements. Mr. Foster did not declare a conflict interest prior to the discussion of these matters.
- E. Following the District Board's vote on July 31st, Brian Foster declined the \$1,782.38 in compensation provided in his Settlement Agreement.

5. CONCLUSION/VIOLATION

- A. The actions described in paragraphs 4(D) and 4(C) constitute one violation of ORS 244.120(2) with two equivalent actions. Because Brian Foster would, with certainty, be financially impacted by the discussions and adoption of the Settlement Agreements, he was met with an actual conflict of interest on three separate occasions. As such, he was statutorily required to declare the nature of his conflict of interest and abstain from the discussions or vote on the matter. By failing to do so, Foster 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) with two equivalent actions.

6. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. Brian Foster has indicated that he wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigative phase.
- B. In lieu of a civil penalty, Brian Foster 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 which have been asserted by the Commission in the above-referenced case against Brian Foster.
- D. Brian Foster 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 the matter and shall be binding upon all parties.

By signing this agreement, Brian Foster 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, Brian Foster 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:

0A7914A6B5384B2...

Respondent: Brian Foster

January 29, 2026

Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

BEFORE THE OREGON GOVERNMENT ETHICS COMMISSION

In the Matter of)
)
) **STIPULATED FINAL ORDER**
)
 Joel Peterson) **CASE NO. 25-730ECF**
)
)
 _____)

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 Joel Peterson.

2. **JURISDICTION:**
 - A. At all material times, Joel Peterson was a member of the Columbia Development Authority’s (CDA) Board of Directors and a Commissioner for the Port of Morrow. As a member of the CDA Board, Joel Peterson is a public official as defined in ORS 244.020(15) and is subject to Oregon Government Ethics Laws.

 - B. On February 6, 2026, the Commission considered the preliminary review report in case number 25-730ECF. The Commission voted to dismiss the allegations of prohibited use of office, as well as the alleged failure to disclose a conflict of interest with respect to the Bank of Eastern Oregon (BEO) while serving in his capacity as a CDA Board Member. The Commission voted to move the case to investigation as it relates to whether Joel Peterson was required to include BEO on his 2025 Statement of Economic Interest (SEI).

3. STIPULATED FACTS

- A. Joel Peterson is a Commissioner for the Port of Morrow and therefore required by ORS 244.050 to file an Annual Verified Statement of Economic Interest (SEI) on or before April 15 of each year that he was on the Port of Morrow's Commission. Joel Peterson timely filed his SEI in 2025.
- B. As an SEI filer, Joel Peterson 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.
- C. When he filed his 2025 SEI, Joel Peterson listed Daily Bread Farms, Pine Lane Ranches, Social Security, and United Church of Christ Congregational of the Dalles as sources of income that produced 10 percent or more of his total annual income in 2024.
- D. Joel Peterson indicated to Commission staff that the Bank of Eastern Oregon (BEO) was a source of income that produced 10 percent or more of his total household income in 2024. He failed to list BOE as a source of income on his 2025 SEI.
- E. The action described in paragraph 3(D) constitutes one violation of ORS 244.060(3) with no equivalent actions.
- F. On February 10, 2026, Joel Peterson filed an amendment to his 2025 SEI to correct his omission of BEO as a source of income that made up 10 percent or more of his total annual household income in 2024.

4. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. On February 6, 2025, the Commission considered information in the preliminary review phase of Case No. 25-730ECF and acted to find cause to open an investigation of this matter.
- B. Joel Peterson indicated that he wished to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigative phase.
- C. As authorized by ORS 244.350(5), Joel Peterson 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 which have been asserted by the Commission in the above-referenced case against Joel Peterson.
- E. Joel Peterson 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 the matter and shall be binding upon all parties.

By signing this agreement, Joel Peterson 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, Joel Peterson 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:

EBE277B7FE70466

Respondent: Joel Peterson

February 13, 2026

Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

BEFORE THE OREGON GOVERNMENT ETHICS COMMISSION

In the Matter of)
)
) **STIPULATED FINAL ORDER**
)
 Kathryn Harrington) **CASE NO. 25-351EJS**
)
)
 _____)

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 Kathryn Harrington.

2. **JURISDICTION:**

A. Kathryn Harrington is the Chair of the Board of Directors (Board) for Clean Water Services (CWS) and Chair for the Washington County Board of Commissioners. As such, for all relevant periods she was a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law found in ORS Chapter 244.

B. On September 12, 2025, the Commission considered information in the preliminary review phase of case #25-351JES and acted to find cause to open an investigation of this matter.

3. **APPLICABLE LAW:**

A. A public official is met with a conflict of interest when, acting in their official capacity, they participate in any action, decision or

recommendation 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 public official, their relative, or any business with which they are associated. [ORS 244.020(1) and (13)].

- B. When met with a conflict of interest, a public official serving on a board or commission, such as Kathryn Harrington, must announce publicly 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 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)].
- C. 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.
- D. OAR 199-008-0005(3) states that "[t]he term "official compensation package" means the wages and other benefits provided to the public official. 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. “Official compensation package” also includes the direct payment of a public official's expenses by the public body, in accordance with the public body's policies.”

- E. ORS 244.050(2) directs public officials who are required to file annual Statements of Economic Interest (SEIs) to do so by April 15th of each year, and those SEIs must include the information required under ORS 244.060, 244.070, and 244.090.
- F. ORS 244.060(5) requires that public officials include the following information on their SEIs: “All expenses with an aggregate value exceeding \$50 received by the public official during the preceding calendar year when participating in a convention, mission, trip or other meeting described in ORS 244.020(7)(b)(F), including the name and address of the organization, unit of government, tribe or corporation paying the expenses, the nature of the event and the date and amount of the expense.”

4. STIPULATED FACTS

- A. Clean Water Services is a special district that serves as a separately managed and financed public utility in Washington County. The CWS Board of Directors is made up of five elected officials who also serve as Washington County Commissioners. Kathryn Harrington has served as the CWS Board Chair since 2019.

- B. In her role as CWS Board Chair, Kathryn Harrington traveled to Copenhagen, Denmark in 2022 and Buffalo, New York in 2024. For both of these trips, Kathryn Harrington purchased her own economy plane tickets and submitted for reimbursement from CWS. The preliminary review in this case identified that, for each of these trips, Kathryn Harrington earned travel rewards in the form of frequent flyer miles. Information provided by CWS indicates that personal travel rewards earned while traveling on official CWS business are included in Board Members' official compensation packages. Therefore, it appears that the benefit of personal frequent flyer rewards obtained by Kathryn Harrington while traveling on official CWS business were included in her official compensation package and would not constitute a violation of ORS 244.040(1).
- C. When Kathryn Harrington traveled to Copenhagen in 2022 and Buffalo in 2024 in her official capacity for CWS, she extended both of these trips for personal business. Kathryn Harrington extended her 2022 stay in Copenhagen by three days, and she extended her 2024 stay in Buffalo by seven days. By combining personal travel with CWS travel, she avoided a financial detriment of separately purchasing her own flights to/from Buffalo and Copenhagen.
- D. The CWS travel policy in place for 2022 through 2024 appears to allow CWS employees to extend their official travel for personal stays, provided that they personally cover additional costs associated with their extended stays; however, the CWS travel policy did not apply to Board Members' travel. Although the CWS travel policy was updated in 2025 to include the "CWS Board of Directors when acting on behalf of Clean Water Services and/or as

a CWS public official,” the benefit of extended stays while traveling on CWS business was not included in Kathryn Harrington’s official compensation package in 2022 and 2024.

- E. The Washington County travel policy treats Commissioners the same as employees, and it specifically states that elected officials are subject to County policy. Kathryn Harrington asserts she believed the extended stay was similarly allowed for Clean Water Services travel, so long as she did not incur any additional expenses. The CWS records do not appear to indicate that CWS incurred any additional travel expense as a result of Kathryn Harrington’s extended stays.
- F. Kathryn Harrington did not publicly disclose her conflicts of interest when seeking reimbursement for travel which included personal business unaffiliated with her CWS business trips.
- G. Kathryn Harrington submitted her 2024 Statement of Economic Interest (SEI) on April 9, 2024. On Section 4 of her SEI, she reported that she received paid expenses from US Water Partnership to attend an international water utilities conference on June 3, 2023. On August 7, 2025, Kathryn Harrington amended her SEI to include the total amount of paid expenses she received for the 2023 conference; however, she did not include this information on her 2024 SEI prior to the April 15th statutory deadline.

5. CONCLUSIONS OF LAW

- A. The actions described in paragraph 4(C) constitute one violation of ORS 244.040(1) with one equivalent action, the actions described

in paragraphs 4(C) and (F) constitute one violation of ORS 244.120(2) with one equivalent action, and the actions described in paragraph 4(G) constitute one violation of ORS 244.060(5).

- 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 244.040(1) with one equivalent action, one violation of ORS 244.120(2) with one equivalent action, and one violation of ORS 244.060(5).

6. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. Kathryn Harrington has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigative phase.
- B. As authorized by ORS 244.350(5), Kathryn Harrington will receive a letter of education in lieu of a civil penalty in order to settle and compromise this matter.
- C. The Commission releases, settles and compromises any and all claims, allegations and charges which have been asserted by the Commission in the above-referenced case against Kathryn Harrington.
- D. Kathryn Harrington 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 the matter and shall be binding upon all parties.

By signing this agreement, Kathryn Harrington 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, Kathryn Harrington 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:


104554452069468
Respondent: Kathryn Harrington

February 23, 2026

Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

BEFORE THE OREGON GOVERNMENT ETHICS COMMISSION

In the Matter of)
)
) **STIPULATED FINAL ORDER**
)
 Pam Treece) **CASE NO. 25-355EJS**
)
)
 _____)

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 Pam Treece.

2. **JURISDICTION:**

A. Pam Treece is a Member of the Board of Directors (Board) for Clean Water Services and Vice-Chair for the Washington County Board of Commissioners. As such, for all relevant periods she was a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law found in ORS Chapter 244.

B. On September 12, 2025, the Commission considered information in the preliminary review phase of case #25-355JES and acted to find cause to open an investigation of this matter.

3. **APPLICABLE LAW:**

A. A public official is met with a conflict of interest when, acting in their official capacity, they participate in any action, decision or

recommendation 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 public official, their relative, or any business with which they are associated. [ORS 244.020(1) and (13)].

- B. When met with a conflict of interest, an elected public official, such as Pam Treece, must announce publicly 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 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)].
- C. 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.
- D. OAR 199-008-0005(3) states that "[t]he term "official compensation package" means the wages and other benefits provided to the public official. 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. “Official compensation package” also includes the direct payment of a public official's expenses by the public body, in accordance with the public body's policies.”

4. STIPULATED FACTS

- A. Clean Water Services is a special district that serves as a separately managed and financed public utility in Washington County. The CWS Board of Directors is made up of five elected officials, who also serve as Washington County Commissioners. Pam Treece has served as a CWS Board Member since 2019.

- B. In her role as a Board Member for CWS, Pam Treece traveled to Copenhagen, Denmark in 2022; Washington D.C. in 2023; New Orleans, Louisiana; Toronto, Canada; Vientiane, Laos and Singapore in 2024. The preliminary review in this case identified that, for each of these trips, Pam Treece earned travel rewards in the form of frequent flyer miles. Information provided by CWS indicates that personal travel rewards earned while traveling on official CWS business are included in Board Members’ official compensation packages. Therefore, it appears that the benefit of personal frequent flyer rewards obtained by Pam Treece while traveling on official CWS business were included in her official compensation package and would not constitute a violation of ORS 244.040(1).

- C. In April 2023, Pam Treece traveled to Washington D.C. to attend the 2023 National Water Policy Fly-In (Fly-In) in her role as a Board Member for CWS. The Fly-In was held from April 25 through April 26, 2023. Pam Treece flew to Newark, NJ on April 20, 2023, and she spent three days in Newark on personal business. On April 24, 2023 she took an Amtrak train to Washington, D.C., and on April 27, 2023 she took a return flight to Portland, OR. Pam Treece requested and received reimbursement from CWS for the cost of her flights and her train ticket. When Pam Treece extended her trip by three extra days for personal business, she avoided a financial detriment of having to purchase her own transportation to/from Newark.
- D. In August 2024, Pam Treece traveled to Toronto, Canada to attend the 2024 International Water Association (IWA) Conference in her role as a Board Member for CWS. The IWA Conference was held from August 11 through August 15, 2024. Pam Treece traveled to Toronto on August 11, 2024 and she returned to Portland on August 20, 2024. CWS paid for Pam Treece's airfare from Portland to Toronto and her airfare from Newark, NJ to Portland. Pam Treece paid for her own airfare from Toronto to Newark, extending her stay four extra days for personal business. When Pam Treece extended her trip to the 2024 IWA Conference for personal business, she avoided the financial detriment of having to purchase her own airfare from Newark to Portland.
- E. The CWS travel policy in place for 2023 and 2024 appears to allow CWS employees to extend their official travel for personal stays, provided that they personally cover additional costs associated with their extended stays; however, the CWS travel policy did not apply

to Board Members' travel. Although the CWS travel policy was updated in 2025 to include the "CWS Board of Directors when acting on behalf of Clean Water Services and/or as a CWS public official," the benefit of extended stays while traveling on CWS business was not included in Pam Treece's official compensation package for 2023 and 2024.

- F. Pam Treece did not publicly disclose her conflicts of interest when seeking reimbursement for travel which included personal business unaffiliated with her CWS business trips.
- G. The Washington County travel policy treats Commissioners the same as employees, and it specifically states that elected officials are subject to County policy. Pam Treece asserts she believed the extended stay was similarly allowed for Clean Water Services travel, so long as she did not incur any additional expenses. The CWS records do not appear to indicate that CWS incurred any additional travel expense as a result of Pam Treece's extended stays.

5. CONCLUSIONS OF LAW

- A. The actions described in paragraphs 4(C) and (D) constitute one violation of ORS 244.040(1) with one equivalent action, and the actions described in paragraphs 4(C), (D), and (F) constitute one violation of ORS 244.120(2) with one equivalent action.
- 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 244.040(1) with one equivalent action and violation of ORS 244.120(2) with one equivalent action.

6. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. Pam Treece has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigative phase.
- B. In lieu of a civil penalty, Pam Treece 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 which have been asserted by the Commission in the above-referenced case against Pam Treece.
- D. Pam Treece 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 the matter and shall be binding upon all parties.

By signing this agreement, Pam Treece 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, Pam Treece 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:


Respondent: Pam Treece

February 24, 2026

Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

BEFORE THE OREGON GOVERNMENT ETHICS COMMISSION

In the Matter of)
)
) **STIPULATED FINAL ORDER**
)
 Soraida Cross) **CASE NO. 25-420EDP**
)
)
 _____)

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 Soraida Cross.

2. **JURISDICTION:**
 - A. Soraida Cross is a Member of the City of Keizer (City) City Council (Council). As such, she is a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Government Ethics Law found in ORS Chapter 244.

 - B. On October 10, 2025, the Commission considered information in the preliminary review phase of Case No. 25-420EDP and acted to find cause to open an investigation of this matter.

3. **APPLICABLE LAW:**
 - A. ORS 244.040(1) prohibits a public official from using or attempting to use the public official’s position or office to obtain a financial benefit or avoid a financial detriment for the public official, the public official’s relative or a business with which the public official or

the official's relative is associated, if the financial benefit or avoidance of detriment would not otherwise be available but for the public official's holding the official position.

- B. ORS 244.040(4) provides 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."
- C. "Confidential information" is defined in OAR 199-008-0005(5) to include 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.

4. STIPULATED FACTS

- A. Soraida Cross joined the City Council in January 2023 and her term expires in January 2027. During the course of her official position, Ms. Cross obtained the personal phone number of Marion County Sheriff Nick Hunter.
- B. On May 14, 2025, in response to a 911 call, officers for the City of Salem Police Department (Salem PD) arrived at the home of Soraida and Mark Cross. Salem PD officers then proceeded to investigate the matter. When Salem PD officer Jayden Meade attempted to read Ms. Cross her Miranda Rights, she informed him of her position as a City Council Member. Later, as Officer Meade attempted to continue his investigation, Ms. Cross stated she would contact Marion County Sheriff Nick Hunter.

- C. Salem PD cited Soraida Cross with a criminal citation for harassment, a misdemeanor which includes possible jail time and a monetary fine ranging from \$1,250 to \$6,250.
- D. When notifying Officer Jayden Mead of her official position on May 14th, Ms. Cross attempted to use her official position to avoid the financial detriment associated with a criminal citation. This opportunity was only available to Ms. Cross but for her official position as a City Council Member.
- E. Simultaneously, on the evening of May 14th, Ms. Cross contacted Sheriff Hunter on his personal phone in an attempt to involve him on the ongoing Salem PD investigation.
- F. The personal phone number of Mr. Hunter is not publicly available information, such that any member of the public may contact him when dealing with law enforcement matters. Consequently, Ms. Cross used confidential information in an attempt to obtain a personal gain.
- G. Soraida Cross contends that she did not willfully or intentionally violate Oregon Government Ethics Law. She further asserts that she is a victim of domestic violence and that the police were called to her home on May 14, 2025, by her ex-husband as a form of retaliation and that was not the only time. Ms. Cross further contends that on the evening of May 14th, she needed to call her friends, which is why she contacted Marion County Sheriff Nick Hunter whom she called for advice out of fear and there was no malicious intent.

5. CONCLUSION/VIOLATION

- A. The actions described in paragraphs 4(D) and (E) constitute one violation each of ORS 244.040(1) and ORS 244.040(4). But for Ms. Cross' official position on the City Council, she would not have had the same opportunities to avoid or attempt to avoid the financial detriment associated with a criminal citation and the use of confidential information. Thus, Ms. Cross engaged in a prohibited use of office and used confidential information for a personal gain.
- 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 244.040(1) and ORS 244.040(4).

6. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. Soraida Cross has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigative phase.
- B. Soraida Cross will pay a civil penalty, as authorized by ORS 244.350(1)(a), in the amount \$500.00 in order to settle and compromise this matter.
- C. The civil penalty in paragraph 6(B), above, will be paid in installments of \$100 per month, beginning April 1, 2026, paid no later than the 15th of each month, until paid in full. If a payment becomes 10 days or more delinquent, the entire balance will be assigned to the Oregon Department of Revenue for collection.

- D. The Commission releases, settles and compromises any and all claims, allegations and charges which have been asserted by the Commission in the above-referenced case against Soraida Cross.
- E. Soraida Cross 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 the matter and shall be binding upon all parties.

By signing this agreement, Soraida Cross 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, Soraida Cross 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:
Soraida Cross
8404D7DF3EE64FB...

Respondent: Soraida Cross

February 17, 2026

Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

- C. In the Plea Petition from the Multnomah County Circuit Court filed January 27, 2025, Mr. Dahlgren pled guilty to one count of Theft in the First Degree (on or between September 8, 2020 through February 18, 2021), one count of Aggravated Identity Theft (on or between October 15, 2020 through March 23, 2021) and one Official Misconduct in the First Degree (on or about March 23, 2021). Mr. Dahlen agreed to serve 5 days in jail, do 360 hours of community services and 60 months' probation and agreed to pay \$16,511 in compensatory fine to the City. Commission staff have confirmed that Mr. Dahlgren has paid the compensatory fine in full and has completed all 360 hours of community service.
- D. ORS 244.040(1) prohibits a public official from using or attempting to use the public official's position or office to obtain a financial benefit or avoid a financial detriment for the public official, the public official's relative or a business with which the public official or the official's relative is associated, if the financial benefit or avoidance of detriment would not otherwise be available but for the public official's holding the official position.
- E. When he engaged in the identify theft identified in the plea petition, and when he engaged in theft in the first degree, also identified in the plea petition, both of which involved the use of incorrect identities on the receipts, Kevin Dahlgren violated ORS 244.040(1). But for holding his official position and having access to the City-issued procurement card, Kevin Dahlgren would not have been able to obtain the financial gain or avoid the financial detriment, that resulted from his use of the City issue procurement card.
- F. Kevin Dahlgren also gained the value of store reward points. ORS 244.040(2)(a) allows a public official to accept "[a]ny part of an official compensation package as determined by the public body that the public

official serves.” OAR 199-008-0005(3) defines an “official compensation package” to include the wages and other benefits provided to the public official. “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.”

- G. Mr. Dahlgren’s assigned duties as a Homeless Services Specialist required him to use the City-issued procurement card to purchase items for the benefit of City clients. When doing so, Mr. Dahlgren would enter his personal rewards cards number at stores such as Walmart and Fred Meyer, and thus, was able accumulate rewards points based on his use of the City-issued procurement card. There was no written policy at the City authorizing or prohibiting employees to use their procurement card to earn personal reward points. Thus, receiving such benefits was not part of Mr. Dahlgren’s official compensation package. The result of these actions resulted in a personal financial benefit for Mr. Dahlgren, an opportunity only available to him but for his official position. Thus, Mr. Dahlgren violated ORS 244.040(1).
- H. 244.040(4) provides 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.”
- I. “Confidential information” is defined in OAR 199-008-0005(5) to include 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.

- J. Because of his position as a Homeless Services Specialist with the City, when making personal purchases using the City-issued procurement card, Mr. Dahlgren used the confidential information of City clients resulting in a personal gain. By doing so, Kevin Dahlgren violated ORS 244.040(4).
- K. A public official is met with a conflict of interest when, acting in their official capacity, they participate in any action, decision, or recommendation 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 public official, their relative, or any business with which they are associated. [ORS 244.020(1) and (13)].
- L. When met with a conflict of interest, an appointed public official, such as Mr. Dahlgren, must provide written notification to their appointing authority of the nature of their conflict of interest and request that appointing authority dispose of the matter giving rise to the conflict of interest. [ORS 244.120(1)(c)].
- M. Each time he submitted an incorrect transaction memo, Mr. Dahlgren was required to submit a written disclosure of the nature of his conflict of interest to his appointing authority. Mr. Dahlgren did not do so. Thus, Mr. Dahlgren violated ORS 244.120(1)(c).
- N. Mr. Dahlgren's actions, described in paragraphs 3(E) and 3(G) resulted in a avoidance of financial detriment as well as a direct financial benefit through an accumulation of reward points associated with the use of the City's procurement card, thus violating ORS 244.040(1). Mr. Dahlgren's use of confidential information of City clients provided a personal gain, thus violating ORS 244.040(4). Finally, Mr. Dahlgren failed to submit written disclosures of his conflicts of interest, thus violating ORS 244.120(1)(c).

- O. The actions described in paragraph (E), paragraph (G), paragraph (J) and paragraph (M) constitute one violation each of ORS 244.040(1), ORS 244.040(4) and ORS 244.120(1)(c).
- P. The Commission contends that the results of the 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 ORS 244.040(1), ORS 244.040(4) and ORS 244.120(1)(c).
- Q. Mr. Dahlgren contends that in a contested case hearing he would present evidence of his long and robust history of advocacy for and service to persons suffering from homelessness and/or addiction. He has spent a large part of his 360 hours of community service time creating, proposing and launching a project which employs homeless individuals to clean streets, giving them purpose and responsibility while fostering community pride and self-determination, and even though he completed the community service hours, he continues to volunteer in that program.

4. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. On February 9, 2024, the Commission considered information in the preliminary review phase of Case No. 23-417EAM and acted to find cause to initiate an investigation. Kevin Dahlgren 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. ORS 244.350 authorizes the Commission to assess civil penalties of up to \$5,000 for each violation of ORS 244.040(1), ORS 244.040(4) and ORS 244.120(1)(c).

- C. Pursuant to ORS 244.390(1) a penalty or sanction imposed by the Commission is in addition and not in lieu of any other penalty or sanction that may be imposed according to the law. Before imposing a civil penalty, ORS 244.390(2) requires the Commission to consider the public interest and any other penalty or sanction that has been imposed on the public official as a result of the same conduct.
- D. Kevin Dahlgren will pay a civil penalty, as authorized by ORS 244.350, in the amount of \$3,000 in order to settle and compromise this matter. Payment in full will be made payable to the Commission no later than September 25, 2026. If the payment becomes 10 day or more delinquent, the entire balance will be assigned to the Oregon Department of Revenue for collection.
- E. The Commission releases, settles and compromises any and all claims, which have been or could be asserted against Kevin Dahlgren within the scope of the above-referenced proceedings.
- F. Kevin Dahlgren 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 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 this matter and shall be binding upon all parties.

By signing this agreement, Kevin Dahlgren 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, Kevin Dahlgren 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:

A8B8280EDA6B475...
Respondent: Kevin Dahlgren

February 23, 2026
Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

OREGON GOVERNMENT ETHICS COMMISSION

INVESTIGATION

CASE NO: 25-354EAM
DATE: February 20, 2026
RESPONDENT: NAFISA, Fai, Member, Board of Directors, Clean Water Services
COMPLAINANT: KNUDSEN, Dirk
RECOMMENDED ACTION: Move to Dismiss

1 **SYNOPSIS:** Nafisa Fai is a Member of the Board of Directors (Board) for Clean Water
2 Services (CWS) and Commissioner for the Washington County Board of Commissioners.
3 The complaint in this matter alleged that Nafisa Fai may have violated Oregon
4 Government Ethics Law by using her official position for personal financial gain.
5 Specifically, the complaint alleges that Nafisa Fai may have received travel benefits
6 unauthorized by her official compensation package when she traveled to Toronto,
7 Canada to attend the 2024 International Water Association (IWA) Congress as a Board
8 Member for CWS.

9
10 On September 12, 2025, after considering the information in preliminary review, the
11 Commission found cause to open an investigation. The focus of the investigation was to
12 determine whether there was enough evidence to indicate that Nafisa Fai used her
13 official position as a CWS Board Member to obtain a personal financial benefit of
14 frequent flyer rewards when she arranged her official travel to the 2024 IWA Conference,
15 and whether the financial benefit would not have been available to her but for her official
16 position, in violation of ORS 244.040(1) and ORS 244.120(2).

17
18 During the investigation, Commission staff received information from CWS indicating that
19 Nafisa Fai's official compensation package authorized her to receive personal travel

1 awards, including frequent flyer miles, earned while traveling on official CWS business.
2 Consequently, Nafisa Fai was not met with a prohibited use of office or conflict of interest
3 when she earned personal frequent flyer rewards from her official CWS travel to the
4 2024 IWA Conference.

5

6 **RELEVANT STATUTES AND ADMINISTRATIVE RULES:** The following Oregon
7 Revised Statutes and Oregon Administrative Rules are applicable to the issues
8 addressed herein:

9

10 **ORS 244.020 Definitions.** As used in this chapter, unless the context requires
11 otherwise:

12

13 (1) “Actual conflict of interest” means any action or any decision or recommendation by a
14 person acting in a capacity as a public official, the effect of which would be to the private
15 pecuniary benefit or detriment of the person or the person’s relative or any business with
16 which the person or a relative of the person is associated unless the pecuniary benefit or
17 detriment arises out of circumstances described in subsection (13) of this section.

18 * * * * *

19 (13) “Potential conflict of interest” means any action or any decision or recommendation
20 by a person acting in a capacity as a public official, the effect of which could be to the
21 private pecuniary benefit or detriment of the person or the person’s relative, or a
22 business with which the person or the person’s relative is associated, unless the
23 pecuniary benefit or detriment arises out of the following:

24 * * * * *

25

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

1 official's holding of the official position or office.

2

3 (2) Subsection (1) of this section does not apply to:

4 (a) Any part of an official compensation package as determined by the public body
5 that the public official serves.

6 * * * * *

7 (c) Reimbursement of expenses.

8 * * * * *

9

10 **ORS 244.120 Methods of handling conflicts.** * * * (2) An elected public official, other
11 than a member of the Legislative Assembly, or an appointed public official serving on a
12 board or commission, shall:

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

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

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

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

23 (3) Nothing in subsection (1) or (2) of this section requires any public official to announce
24 a conflict of interest more than once on the occasion which the matter out of which the
25 conflict arises is discussed or debated.

26 (4) Nothing in this section authorizes a public official to vote if the official is otherwise
27 prohibited from doing so.

28 * * * * *

29

30 **OAR 199-008-0005 Definitions of terms in ORS Chapter 244**

31 * * * * *

32 (3) The term "official compensation package" means the wages and other benefits

1 provided to the public official. To be part of the public official's "official compensation
2 package", the wages and benefits must have been specifically approved by the public
3 body in a formal manner, such as through a union contract, an employment contract, or
4 other adopted personnel policies that apply generally to employees or other public
5 officials. "Official compensation package" also includes the direct payment of a public
6 official's expenses by the public body, in accordance with the public body's policies.

7
8 (4) The term "reimbursement of expenses" means the payment by a public body to a
9 public official serving that public body, of expenses incurred in the conduct of official
10 duties on behalf of the public body. Any such repayment must comply with any
11 applicable laws and policies governing the eligibility of such repayment. Expenses paid
12 by the public body to their own public officials need not be reported by the public official
13 under ORS 244.060.

14 * * * * *

15
16 **INVESTIGATION:** On June 24, 2025, the Oregon Government Ethics Commission
17 (Commission) initiated a preliminary review based on information provided in a signed
18 complaint from Dirk Knudsen. The complaint alleges that Nafisa Fai, as a Member of
19 the Board of Directors for Clean Water Services, accepted unauthorized travel benefits
20 when she traveled on behalf of CWS. (#PR1).

21
22 At the Commission's September 12, 2025 meeting, the Commission considered the
23 information presented in the preliminary review report for this case and found cause to
24 open an investigation. (#IR1). The focus of the investigation was to determine whether
25 there was sufficient evidence to indicate that Nafisa Fai violated ORS 244.040(1) or
26 ORS 244.120(2). Specifically, the investigation focused on whether Nafisa Fai used her
27 official position with CWS to obtain a personal financial benefit and whether she was
28 faced with a conflict of interest that required disclosure.

29
30 **Background Information**

31 On February 3, 1970 Washington County voters approved the formation of the Unified
32 Sewerage Agency (USA) to provide wastewater treatment and water resource

1 management for local residents. In 2001, USA was renamed Clean Water Services
2 (CWS) to reflect their expanding role in protecting water resources. (#IR5).

3
4 CWS is a County Service District under ORS Chapter 451 and a special district under
5 ORS Chapter 198 that serves as a separately managed and financed public utility in
6 Washington County. The CWS Board of Directors is made up of five elected officials
7 who also serve as Washington County Commissioners. Nafisa Fai has served as a
8 CWS Board Member since 2021. (#PR2).

9

10 Complaint

11 The complaint states that CWS has about 600,000 consumers in Washington County,
12 and taxpayers have no choice but to fund CWS. It states that ratepayers have had their
13 fees increased, yet the CWS Board and other CWS executives have participated in
14 wasteful and reckless spending. The complaint states that CWS Board Members may
15 have accepted frivolous travel benefits including luxury accommodation, 5-star dining,
16 gifts, and other travel expenses when they traveled on behalf of CWS. (#PR1).

17

18 The complaint states that Nafisa Fai may have traveled to Toronto, Canada to attend
19 the 2024 International Water Association Congress for CWS. The complaint asserts that
20 the CWS Board Members were not qualified to participate in this event, and more
21 relevant executives from appropriate divisions within CWS could have been utilized.
22 The complaint also states that CWS executives may have used elaborate travel, meals,
23 and gifts to obtain the goodwill of the CWS Board Members in an attempt to influence
24 policies and obtain budgetary increases. (#PR1).

25

26 The complaint states that CWS Board Members, who also serve as Washington County
27 Commissioners, may have been required to follow Washington County rules and
28 policies on travel and spending, and it alleges that the Board Members may have
29 exceeded the allowances provided by both CWS and Washington County policies,
30 rules, and procedures. (#PR1).

31 ///

32 ///

1 Response

2 Nafisa Fai responded to the complaint via an email to Commission staff on July 7, 2025.
3 In the response, Nafisa Fai stated that the only trip she participated in, on behalf of
4 CWS, was a 2024 trip to the IWA Conference in Toronto. She stated that CWS covered
5 the costs of her flight, hotel, and conference registration. She explains that she
6 personally covered expenses for meals, ground transportation and parking. Nafisa Fai
7 provided receipts and travel expense records for her CWS travel. (#PR3).

8

9 2024 Toronto - IWA Conference

10 Commission staff received a copy of the Travel/Training Reconciliation Form submitted
11 to CWS by Nafisa Fai on September 17, 2024 for the 2024 Toronto IWA Conference.
12 Nafisa Fai also provided copies of her flight itinerary, hotel receipt, conference
13 schedule, and per diem rate calculations for this trip. (#PR4).

14

15 The records provided indicate that CWS purchased Nafisa Fai an economy seat on an
16 Alaska Airlines flight to Toronto on August 10, 2024, and an economy seat on a Delta
17 Airlines return flight on August 16, 2024. The records indicate that Nafisa Fai stayed at
18 the Toronto Marriott hotel while attending the IWA Conference. The IWA Conference
19 itinerary indicates that the Toronto Marriott hotel is approximately a 10-minute walk to
20 the convention center, and the hotel invoice indicates that CWS may have received a
21 group rate when they booked her room. (#PR4).

22

23 The Travel/Training Reconciliation Form submitted by Nafisa Fai indicates that she
24 received partial per diem for seven days based on the US Department of State GSA per
25 diem rate for the area. The conference itinerary identifies two restaurant reservations for
26 CWS attendees' meals: Jump Restaurant and Evviva. The Travel/Training
27 Reconciliation Form submitted by Nafisa Fai indicates that she received per diem for
28 days/times when meals were not provided by CWS. (#PR4).

29

30 On July 30, 2025, Anh Le, CWS Executive Management Analyst to the CEO, sent a text
31 message to Nafisa Fai asking about her seating preference for her flight to Toronto, and
32 if she had an Alaska Airlines frequent flyer number. Nafisa Fai responded via text,

1 stating her preference for an aisle seat, and she provided Anh Le with her personal
2 Alaska Airlines frequent flyer number. (#IR2).

3
4 An email sent from Anh Le to CWS Travel Coordinator Karen Weidel on August 1, 2024
5 indicates that she asked for Nafisa Fai's Alaska Airlines frequent flyer number to be
6 added to her flight to Toronto. Karen Weidel confirmed that Nafisa Fai's frequent flyer
7 number was added to the flight booked by CWS. (#PR4).

8 9 General Expenses

10 CWS provided multiple spreadsheets of general expenses for the 2021, 2022, 2023, and
11 2024 fiscal years. Based on the information in the spreadsheets, it appears that the only
12 reimbursements received by Nafisa Fai, from CWS, were her travel expenses (per diem,
13 mileage, and incidentals) for the 2024 Toronto IWA Conference. (#PR5, #PR6).

14 15 CWS Travel Policy

16 Commission staff reviewed the CWS Travel Policy, which became effective March 1,
17 2012. The CWS travel policy in effect for all times relevant to this investigation states, "It
18 is the District's intent to reimburse *employees* for reasonable, ordinary, and necessary
19 business expenses incurred when traveling on behalf of the District, in accordance with
20 this Policy." [emphasis added.] Although the CWS travel policy appears to specifically
21 address employee travel, it does not address Board Members' travel. (#PR7).

22 23 Washington County Travel Policy

24 Washington County Policy 402 - Travel and Business Expense, amended on May 18,
25 2021, states that the policy applies to anyone traveling on County business unless
26 otherwise directed by contract. The policy further clarifies that the elected officials are
27 employees of the County for income tax purposes and, for this reason, are subject to this
28 policy. The policy states that travel and business expenses must be "reasonable and
29 necessary." It states that individuals traveling on County business are expected to be
30 prudent and only incur costs they normally would incur if traveling at their own expense,
31 and expenses solely for the benefit of an individual are not allowable. (#PR8).

32 ///

1 Tanya Ange Phone Call

2 On August 6, 2025 Commission staff spoke with Tanya Ange, County Administrator for
3 Washington County. Tanya Ange explained that CWS used to be a component unit of
4 Washington County, but CWS has since separated from Washington County. She
5 explained that, although the same individuals serve both governing bodies, they function
6 as separate entities with their own organizational structures and policies. (#PR9).

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8 Tanya Ange explained that Washington County Commissioners need to apply for
9 approval of County training and travel through the County Administrative Office to ensure
10 that there are funds available in the budget for their travel, and to ensure that it is within
11 policy. She explained that the County is not responsible for reviewing CWS travel. She
12 stated that, when on County business, the Commissioners are subject to County policy,
13 and when on CWS business, they are subject to CWS policy. (#PR9).

14

15 Unified Sewerage Agency Board Order

16 Before it was renamed in 2001, Clean Water Services used to be called the Unified
17 Sewerage Agency (USA). At its regular meeting on October 5, 1999, the USA Board of
18 Directors voted to approve Resolution and Order No. USA 99-48 (Board Order),
19 adopting travel awards as part of USA's salary and benefits compensation package.
20 The Board Order states:

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22 [T]ravel awards, including frequent flyer miles, compensation for being displaced
23 and related items accrued or earned by officials and employees on official
24 business are declared to be part of the salary and benefits to which such officials
25 and employees are entitled as compensation. (#IR4).

26

27 Christine Meadows Email

28 On December 4, 2025, Christine Meadows, Senior Assistant Legal Counsel for CWS,
29 sent an email to Commission staff stating that, based on her research, the Board Order
30 was never repealed by CWS, and it was still in place for CWS and its employees in
31 2024. (#IR3).

32 ///

1 Updated CWS Travel Policy

2 CWS approved an updated Travel and Training Policy, effective September 5, 2025.
3 The updated travel policy states that the policy applies not only to CWS employees, but
4 also to the “CWS Board of Directors when acting on behalf of Clean Water Services
5 and/or as a CWS public official.” The updated policy also states:

6
7 Credit card and travel awards including frequent flier miles, compensation for
8 being displaced, and related items accrued or earned by officials and employees
9 on official District business are part of the salary and benefits to which such
10 officials and employees are entitled as compensation. (#IR6).

11
12 **CONCLUSIONS:** Nafisa Fai is a Board Member for Clean Water Services and has held
13 that position since 2021. As such, she is a public official, as defined in ORS
14 244.020(15), and therefore subject to Oregon Government Ethics Law.

15
16 Prohibited Use of Office

17 Per ORS 244.040(1), Nafisa Fai would be engaging in a prohibited use of office any
18 time she used or attempted to use her position to obtain a financial gain or avoid a
19 financial detriment, for herself, her relatives or household members, or for any business
20 with which any of them are associated, and that financial gain or avoidance of detriment
21 would not otherwise have been available but for Nafisa Fai holding her position on the
22 CWS Board.

23
24 Nafisa Fai traveled on behalf of CWS, in her role as CWS Board Member, to attend the
25 2024 International Water Association Congress in Toronto, Canada, departing Portland,
26 Oregon on August 10, 2024 and returning on August 16, 2024. CWS booked Nafisa Fai
27 an economy round trip flight to Toronto, and Nafisa Fai provided CWS staff with her
28 personal frequent flyer number to add to her airline reservation for frequent flyer
29 rewards. CWS records received by Commission staff do not indicate that Nafisa Fai
30 participated in other travel on behalf of CWS, nor does the information indicate that she
31 received other reimbursements. It appears that Nafisa Fai stayed at one of the
32 designated conference hotels, the Toronto Marriott, when she attended the 2024 IWA

1 Conference, and CWS may have received a discounted group rate.

2

3 The preliminary review in this case identified that Nafisa Fai may have used her official
4 position as a CWS Board Member to obtain a personal financial benefit of frequent flyer
5 rewards when she arranged her flights to attend the 2024 IWA Conference in Toronto,
6 and the financial benefit of personal frequent flyer rewards may not have been available
7 to her but for her official position.

8

9 The Washington County travel policy states that County officials, including elected
10 officials, are subject to the policy while traveling on County business; however, when
11 Nafisa Fai traveled to the 2024 IWA Conference, she was traveling on CWS business,
12 not County business. Therefore, it does not appear that County policy applies to her
13 CWS travel. As a special district under Oregon law, CWS is a separate legal entity from
14 the County, with its own governing body. Therefore, it appears that only the CWS
15 policies apply when CWS Board Directors are traveling on CWS business.

16

17 Although the CWS travel policy was updated in September 2025 to specifically apply to
18 CWS Board Members traveling on official business, the CWS travel policy effective at
19 the time of Nafisa Fai's official travel to Toronto in 2024 does not appear to apply to
20 Board Members. CWS does not have compensation agreements with the Board
21 Members, nor does CWS compensate Board Members directly for their Board service.
22 The information provided by CWS during this investigation indicates that, before the
23 Unified Sewerage Agency was renamed to Clean Water Services, the USA Board of
24 Directors passed Resolution and Order No. USA 99-48, and this Board Order was never
25 rescinded or repealed. The Board Order provides that "*officials and* employees on
26 official business" [emphasis added] are entitled to receive travel awards, including
27 frequent flyer miles. Christine Meadows, Senior Assistant Legal Counsel for CWS,
28 indicated that the Board Order was still in place for CWS officials in 2024. Thus,
29 personal frequent flyer rewards earned while traveling on CWS business were a part of
30 Nafisa Fai's "official compensation package" as defined by OAR 199-008-0005(3).

31

32 ORS 244.040(2)(a) states that a public official obtaining a financial benefit included in

1 their official compensation package, as determined by their public body, does not violate
2 ORS 244.040(1). The information examined in this investigation indicates that frequent
3 flyer rewards earned by Nafisa Fai when she traveled to Toronto in 2024 for CWS
4 business were included in her official compensation package. Thus, the information
5 does not indicate that Nafisa Fai used her official position as Member of the CWS Board
6 to obtain a personal financial benefit or avoid a financial detriment that would not have
7 been otherwise available, or that she violated ORS 244.040(1).

8

9 Conflict of Interest

10 A public official is met with a conflict of interest when they take any action or make any
11 decision or recommendation in their official capacity which could or would result in a
12 private financial benefit or detriment of the person, their relative, or a business with
13 which they or their relative are associated.

14

15 As noted above, Nafisa Fai, acting in her role as a CWS Board Member, traveled to the
16 Toronto, Canada in August of 2024. When Nafisa Fai worked with CWS staff to arrange
17 her flights, she provided CWS staff with her personal frequent flyer number to earn
18 traveler rewards. As indicated by the Board Order and CWS attorney Christine
19 Meadows, any personal frequent flyer rewards earned by Nafisa Fai as a result of her
20 official CWS travel appear to be part of her official compensation package with CWS.
21 Based on the information obtained in this investigation, there is not a preponderance of
22 evidence to believe that Nafisa Fai took any actions or made any decisions or
23 recommendations in her official capacity for her own personal financial benefit. Thus,
24 Nafisa Fai was not met with an actual or potential conflict of interest, and she was not
25 required to publicly announce any conflicts of interest or abstain from participation in the
26 matter pursuant to ORS 244.120(2).

27

28 **RECOMMENDATIONS:** The Oregon Government Ethics Commission should find that
29 there is not a preponderance of evidence in this case to establish that Nafisa Fai
30 violated ORS 244.040(1) and ORS 244.120(2) and should order that the case be
31 dismissed. (Motion 7).

32 ///

1 **ASSOCIATED DOCUMENTS:**

- 2 #PR1 Original Complaint received 6/24/2025
- 3 #PR2 Clean Water Services Board of Directors accessed 7/8/2025
- 4 #PR3 Nafisa Fai Response dated 7/7/2025
- 5 #PR4 Travel Form and Receipts received on 7/7/2025
- 6 #PR5 PR5 Nafisa Fai CWS AP Invoice Distributions on 7/17/2025
- 7 #PR6 CWS PCard Expenses for Fiscal Year 2022
- 8 #PR7 Travel Policy effective 3/1/2012
- 9 #PR8 Washington County Travel Policy amended 5/18/2021
- 10 #PR9 Memo of Phone Call with Tanya Ange on 8/6/2025
- 11 #IR1 25-354EAM Fai Nafisa PR dated 8/21/2025
- 12 #IR2 Fai Text Message on 7/30/2024
- 13 #IR3 CWS Informational Email received 12/4/2025
- 14 #IR4 Unified Sewerage Agency Board Order dated 10/5/1999
- 15 #IR5 CWS History accessed 12/15/2025
- 16 #IR6 CWS Travel and Training Policy updated 9/5/2025

PREPARED BY Joshua Sullivan 2/20/2026
Josh Sullivan Date
Investigator

APPROVED BY Susan V. Myers 2/20/2026
Susan V. Myers Date
Executive Director

REVIEWED BY Sean Brady 2/20/2026
Sean T. Brady Date
Senior Assistant Attorney General

OREGON GOVERNMENT ETHICS COMMISSION

INVESTIGATION

CASE NO: 25-356EAM
DATE: February 20, 2026
RESPONDENT: WILLEY, Jerry, Member, Board of Directors, Clean Water Services
COMPLAINANT: KNUDSEN, Dirk
RECOMMENDED ACTION: Move to Dismiss

1 **SYNOPSIS:** Jerry Willey is a Member of the Board of Directors (Board) for Clean Water
2 Services (CWS) and Commissioner for the Washington County Board of Commissioners.
3 The complaint in this matter alleged that Jerry Willey may have violated Oregon
4 Government Ethics Law by using his official position for personal financial gain.
5 Specifically, the complaint alleges that Jerry Willey may have received travel benefits
6 unauthorized by his official compensation package when he traveled to Toronto, Canada
7 to attend the 2024 International Water Association (IWA) Congress and when he
8 traveled to New Orleans, Louisiana to attend the 2024 Water Environment Federation's
9 Technical Exhibition and Conference (WEFTEC) as a Board Member for CWS.
10
11 On September 12, 2025, after considering the information in preliminary review, the
12 Commission found cause to open an investigation. The focus of the investigation was to
13 determine whether there was enough evidence to indicate that Jerry Willey used his
14 official position as a CWS Board Member to obtain a personal financial benefit of
15 frequent flyer rewards when he arranged his official travel to the 2024 IWA Conference
16 and the 2024 WEFTEC, and whether the financial benefit would not have been available
17 to him but for his official position, in violation of ORS 244.040(1) and ORS 244.120(2).
18 ///

1 During the investigation, Commission staff received information from CWS indicating that
2 Jerry Willey’s official compensation package authorized him to receive personal travel
3 awards, including frequent flyer miles, earned while traveling on official CWS business.
4 Consequently, Jerry Willey was not met with a prohibited use of office or conflict of
5 interest when he earned personal frequent flyer rewards from his official CWS travel to
6 the 2024 IWA Conference and the 2024 WEFTEC.

7

8 **RELEVANT STATUTES AND ADMINISTRATIVE RULES:** The following Oregon
9 Revised Statutes and Oregon Administrative Rules are applicable to the issues
10 addressed herein:

11

12 **ORS 244.020 Definitions.** As used in this chapter, unless the context requires
13 otherwise:

14

15 (1) “Actual conflict of interest” means any action or any decision or recommendation by a
16 person acting in a capacity as a public official, the effect of which would be to the private
17 pecuniary benefit or detriment of the person or the person’s relative or any business with
18 which the person or a relative of the person is associated unless the pecuniary benefit or
19 detriment arises out of circumstances described in subsection (13) of this section.

20 * * * * *

21 (13) “Potential conflict of interest” means any action or any decision or recommendation
22 by a person acting in a capacity as a public official, the effect of which could be to the
23 private pecuniary benefit or detriment of the person or the person’s relative, or a
24 business with which the person or the person’s relative is associated, unless the
25 pecuniary benefit or detriment arises out of the following:

26 * * * * *

27

28 **ORS 244.040 Prohibited use of official position or office; exceptions; other**
29 **prohibited actions.** (1) Except as provided in subsection (2) of this section, a public
30 official may not use or attempt to use official position or office to obtain financial gain or
31 avoidance of financial detriment for the public official, a relative or member of the
32 household of the public official, or any business with which the public official or a relative

1 or member of the household of the public official is associated, if the financial gain or
2 avoidance of financial detriment would not otherwise be available but for the public
3 official's holding of the official position or office.

4
5 (2) Subsection (1) of this section does not apply to:

6 (a) Any part of an official compensation package as determined by the public body
7 that the public official serves.

8 * * * * *

9 (c) Reimbursement of expenses.

10 * * * * *

11
12 **ORS 244.120 Methods of handling conflicts.** * * * (2) An elected public official, other
13 than a member of the Legislative Assembly, or an appointed public official serving on a
14 board or commission, shall:

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

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

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

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

25 (3) Nothing in subsection (1) or (2) of this section requires any public official to announce
26 a conflict of interest more than once on the occasion which the matter out of which the
27 conflict arises is discussed or debated.

28 (4) Nothing in this section authorizes a public official to vote if the official is otherwise
29 prohibited from doing so.

30 * * * * *

31 ///

32 ///

1 **OAR 199-008-0005 Definitions of terms in ORS Chapter 244**

2 * * * * *

3 (3) The term “official compensation package” means the wages and other benefits
4 provided to the public official. To be part of the public official's “official compensation
5 package”, the wages and benefits must have been specifically approved by the public
6 body in a formal manner, such as through a union contract, an employment contract, or
7 other adopted personnel policies that apply generally to employees or other public
8 officials. “Official compensation package” also includes the direct payment of a public
9 official's expenses by the public body, in accordance with the public body's policies.

10
11 (4) The term “reimbursement of expenses” means the payment by a public body to a
12 public official serving that public body, of expenses incurred in the conduct of official
13 duties on behalf of the public body. Any such repayment must comply with any
14 applicable laws and policies governing the eligibility of such repayment. Expenses paid
15 by the public body to their own public officials need not be reported by the public official
16 under ORS 244.060.

17 * * * * *

18
19 **INVESTIGATION:** On June 24, 2025, the Oregon Government Ethics Commission
20 (Commission) initiated a preliminary review based on information provided in a signed
21 complaint from Dirk Knudsen. The complaint alleges that Jerry Willey, as a Member of
22 the Board of Directors for Clean Water Services, accepted unauthorized travel benefits
23 when he traveled on behalf of CWS. (#PR1).

24
25 At the Commission’s September 12, 2025 meeting, the Commission considered the
26 information presented in the preliminary review report for this case and found cause to
27 open an investigation. (#IR1). The focus of the investigation was to determine whether
28 there was sufficient evidence to indicate that Jerry Willey violated ORS 244.040(1) or
29 ORS 244.120(2). Specifically, the investigation focused on whether Jerry Willey used
30 his official position with CWS to obtain a personal financial benefit and whether he was
31 faced with a conflict of interest that required disclosure.

32 ///

1 Background Information

2 On February 3, 1970 Washington County voters approved the formation of the Unified
3 Sewerage Agency (USA) to provide wastewater treatment and water resource
4 management for local residents. In 2001, USA was renamed Clean Water Services
5 (CWS) to reflect their expanding role in protecting water resources. (#IR5).

6
7 CWS is a County Service District under ORS Chapter 451 and a special district under
8 ORS Chapter 198 that serves as a separately managed and financed public utility in
9 Washington County. The CWS Board of Directors is made up of five elected officials
10 who also serve as Washington County Commissioners. Jerry Willey has served as a
11 CWS Board Member since 2019. (#PR2).

12
13 Complaint

14 The complaint states that CWS has about 600,000 consumers in Washington County,
15 and taxpayers have no choice but to fund CWS. It states that ratepayers have had their
16 fees increased, yet the CWS Board and other CWS executives have participated in
17 wasteful and reckless spending. The complaint states that CWS Board Members may
18 have accepted frivolous travel benefits including luxury accommodation, 5-star dining,
19 gifts, and other travel expenses when they traveled on behalf of CWS. (#PR1).

20
21 The complaint states that Jerry Willey may have traveled to Toronto, Canada to attend
22 the 2024 International Water Association Congress for CWS. The complaint asserts that
23 the CWS Board Directors were not qualified to participate in this event, and more
24 relevant executives from appropriate divisions within CWS could have been utilized.
25 The complaint also states that CWS executives may have used elaborate travel, meals,
26 and gifts to obtain the goodwill of the CWS Board members in an attempt to influence
27 policies and obtain budgetary increases. (#PR1).

28
29 The complaint states that CWS Board Directors, who also serve as Washington County
30 Commissioners, may have been required to follow Washington County rules and
31 policies on travel and spending, and it alleges that the Board members may have
32 exceeded the allowances provided by both CWS and Washington County policies,

1 rules, and procedures. (#PR1).

2

3 Response

4 On August 8, 2025, Commission staff spoke with Jerry Willey on the phone. Jerry Willey
5 stated that he went on two trips on behalf of CWS. Jerry Willey stated that he booked
6 his own flights when he traveled on CWS business because he liked to select his own
7 flights and seats. He stated that he included his personal frequent flyer number for flight
8 rewards when he booked his flights for CWS. (#PR7).

9

10 2024 Toronto - IWA Conference

11 Jerry Willey provided Commission staff with the Travel/Training Reconciliation Form he
12 submitted to CWS on September 17, 2024 for the 2024 Toronto IWA Conference. Jerry
13 Willey also provided copies of his flight itinerary, hotel receipt, conference schedule, and
14 per diem rate calculations. (#PR8).

15

16 The records provided indicate that CWS reimbursed Jerry Willey for a main cabin seat
17 on a round-trip Alaska Airlines flight to Toronto, Canada departing Portland, Oregon on
18 August 11, 2024, and returning on August 16, 2024. It appears that Jerry Willey also
19 purchased and personally paid for a second flight to Toronto for Judith Willey aka Judy
20 Willey, and he personally paid for seat upgrades. Jerry Willey only requested and
21 received reimbursement from CWS for his main cabin flight. Jerry Willey included his
22 personal Alaska Airlines mileage number, and it appears that he was eligible for a “MVP
23 Gold guest upgrade.” The records indicate that Jerry Willey stayed at the Toronto
24 Marriott hotel while attending the IWA Conference. The IWA Conference itinerary
25 indicates that the Toronto Marriott hotel is approximately a 10-minute walk to the
26 convention center, and the hotel invoice indicates that CWS may have received a group
27 rate when they booked his room. (#PR8).

28

29 The Travel/Training Reconciliation Form submitted by Jerry Willey indicates that he
30 received partial per diem for six days based on the US Department of State GSA per
31 diem rate. The IWA Conference itinerary also identifies two restaurant reservations for
32 CWS attendees’ meals: Jump Restaurant and Evviva. The information indicates that

1 CWS was charged \$157.96 for Judy Willey’s “Gala Dinner.” The information indicates
2 that Jerry Willey reimbursed CWS for Judy Willey’s gala dinner, and it is unclear
3 whether CWS paid \$157.96 for Jerry Willey to attend the gala dinner. (#PR8).

4
5 2024 New Orleans - WEFTEC

6 Jerry Willey provided records that he attended the 2024 Water Environment
7 Federation's Technical Exhibition and Conference in New Orleans in his role as a CWS
8 Board Member. (#PR9).

9
10 Jerry Willey, along with other CWS officials, stayed at the Omni Riverfront Hotel in New
11 Orleans. The itinerary for the October 5-9, 2024 WEFTEC indicates that the Omni
12 Riverfront Hotel was one of the designated conference hotels with shuttles to the
13 convention center. (#PR9).

14
15 The receipt for Jerry Willey’s round-trip flight to New Orleans indicates that he booked a
16 main cabin flight on American Airlines, departing Portland, Oregon on October 6, 2024
17 and returning on October 9, 2024, and he was waitlisted for Premium Class and First
18 Class. The information indicates that Jerry Willey included his Alaska Airlines MVP
19 OneWorld Ruby frequent flyer number for rewards when he booked his flight. CWS
20 reimbursed Jerry Willey for the full cost of his round trip flight to New Orleans. The
21 Travel/Training Reconciliation Form submitted by Jerry Willey indicates that he was
22 reimbursed for Ubers to and from the airport, and he was paid per diem for meals and
23 incidental expenses based on the GSA rate for FY2025. (#PR9).

24
25 General Expenses

26 CWS provided multiple spreadsheets of general expenses for the 2021, 2022, 2023, and
27 2024 fiscal years. Based on the information in the spreadsheets, CWS appears to have
28 reimbursed Jerry Willey for travel expenses related to the IWA Conference and the New
29 Orleans WEFTEC in 2024. The spreadsheets do not identify reimbursements for any
30 specific meals, but they do reflect reimbursements for airfare, per diem, incidentals,
31 mileage, Ubers, taxis, and parking. (#PR3).

32 ///

1 CWS Travel Policy

2 Commission staff reviewed the CWS Travel Policy, which became effective March 1,
3 2012. The CWS travel policy in effect for all times relevant to this investigation states, “It
4 is the District’s intent to reimburse *employees* for reasonable, ordinary, and necessary
5 business expenses incurred when traveling on behalf of the District, in accordance with
6 this Policy.” [emphasis added.] Although the CWS travel policy appears to specifically
7 address employee travel, it does not address Board Members’ travel. (#PR4).

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9 Washington County Travel Policy

10 Washington County Policy 402 - Travel and Business Expense, amended on May 18,
11 2021, states that the policy applies to anyone traveling on County business unless
12 otherwise directed by contract. The policy further clarifies that the elected officials are
13 employees of the County for income tax purposes and, for this reason, are subject to this
14 policy. The policy states that travel and business expenses must be “reasonable and
15 necessary.” It states that individuals traveling on County business are expected to be
16 prudent and only incur costs they normally would incur if traveling at their own expense,
17 and expenses solely for the benefit of an individual are not allowable. (#PR5).

18

19 Tanya Ange Phone Call

20 On August 6, 2025 Commission staff spoke with Tanya Ange, County Administrator for
21 Washington County. Tanya Ange explained that CWS used to be a component unit of
22 Washington County, but CWS has since separated from Washington County. She
23 explained that, although the same individuals serve both governing bodies, they function
24 as separate entities with their own organizational structures and policies. (#PR6).

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26 Tanya Ange explained that Washington County Commissioners need to apply for
27 approval of County training and travel through the County Administrative Office to ensure
28 that there are funds available in the budget for their travel, and to ensure that it is within
29 policy. She explained that the County is not responsible for reviewing CWS travel. She
30 stated that, when on County business, the Commissioners are subject to County policy,
31 and when on CWS business, they are subject to CWS policy. (#PR6).

32 ///

1 Unified Sewerage Agency Board Order

2 Before it was renamed in 2001, Clean Water Services used to be called the Unified
3 Sewerage Agency (USA). At its regular meeting on October 5, 1999, the USA Board of
4 Directors voted to approve Resolution and Order No. USA 99-48 (Board Order),
5 adopting travel awards as part of USA's salary and benefits compensation package.
6 The Board Order states:

7
8 [T]ravel awards, including frequent flyer miles, compensation for being displaced
9 and related items accrued or earned by officials and employees on official
10 business are declared to be part of the salary and benefits to which such officials
11 and employees are entitled as compensation. (#IR4).

12
13 Christine Meadows Email

14 On December 4, 2025, Christine Meadows, Senior Assistant Legal Counsel for CWS,
15 sent an email to Commission staff stating that, based on her research, the Board Order
16 was never repealed by CWS, and it was still in place for CWS and its employees in
17 2024. (#IR3).

18
19 Updated CWS Travel Policy

20 CWS approved an updated Travel and Training Policy, effective September 5, 2025.
21 The updated travel policy states that the policy applies not only to CWS employees, but
22 also to the "CWS Board of Directors when acting on behalf of Clean Water Services
23 and/or as a CWS public official." The updated policy also states:

24
25 Credit card and travel awards including frequent flier miles, compensation for
26 being displaced, and related items accrued or earned by officials and employees
27 on official District business are part of the salary and benefits to which such
28 officials and employees are entitled as compensation. (#IR6).

29
30 **CONCLUSIONS:** Jerry Willey is a Board Member for Clean Water Services and has
31 held that position since 2019. As such, he is a public official, as defined in ORS
32 244.020(15), and therefore subject to Oregon Government Ethics Law.

1 Prohibited Use of Office

2 Per ORS 244.040(1), Jerry Willey would be engaging in a prohibited use of office any
3 time he used or attempted to use his position to obtain a financial gain or avoid a
4 financial detriment, for himself, his relatives or household members, or for any business
5 with which any of them are associated, and that financial gain or avoidance of detriment
6 would not otherwise have been available but for Jerry Willey holding his position on the
7 CWS Board.

8
9 Jerry Willey traveled on behalf of CWS, in his role as CWS Board Member, to attend the
10 2024 International Water Association Congress in Toronto, Canada, departing Portland,
11 Oregon on August 11, 2024 and returning on August 16, 2024. When Jerry Willey
12 booked his round trip flight to Toronto, he purchased a second ticket for his wife, Judith
13 Willey, and seat upgrades for both tickets. Jerry Willey included his personal Alaska
14 Airlines frequent flyer number on his airline reservation to obtain the personal benefit of
15 frequent flyer rewards. Jerry Willey submitted a reimbursement request to CWS on
16 September 17, 2024, in which he requested reimbursement for his main cabin flight. He
17 did not request reimbursement for his seat upgrade or Judith Willey's ticket. On
18 November 1, 2024, Jerry Willey requested, and later received, reimbursement from
19 CWS for his coach flight to attend the 2024 WEFTEC in New Orleans, Louisiana,
20 departing Portland, Oregon on October 6, 2024 and returning on October 9, 2024. Jerry
21 Willey included his personal Alaska Airlines frequent flyer number for rewards when he
22 booked his flight to attend the 2024 WEFTEC.

23
24 Jerry Willey stayed at one of the designated conference hotels, the Toronto Marriott,
25 when he attended the 2024 IWA Conference, and CWS may have received a
26 discounted group rate. Jerry Willey stayed at the Omni Riverfront Hotel when he
27 attended the 2024 WEFTEC. The Omni Riverfront Hotel was one of the designated
28 conference hotels with shuttles to the convention center. CWS records received by
29 Commission staff do not indicate that Jerry Willey participated in other travel on behalf
30 of CWS, nor does the information indicate that he received other reimbursements.

31 ///

32 ///

1 The preliminary review in this case identified that Jerry Willey may have used his official
2 position as a CWS Board Member to obtain a personal financial benefit of frequent flyer
3 rewards when he booked his flights to attend the 2024 IWA Conference and the 2024
4 WEFTEC, and the financial benefit of personal frequent flyer rewards may not have
5 been available to him but for his official position.

6
7 The Washington County travel policy states that County officials, including elected
8 officials, are subject to the policy while traveling on County business; however, when
9 Jerry Willey traveled to the 2024 IWA Conference and the 2024 WEFTEC, he was
10 traveling on CWS business, not County business. Therefore, it does not appear that
11 County policy applies to his CWS travel. As a special district under Oregon law, CWS is
12 a separate legal entity from the County, with its own governing body. Therefore, it
13 appears that only the CWS policies apply when CWS Board Directors are traveling on
14 CWS business.

15
16 Although the CWS travel policy was updated in September 2025 to specifically apply to
17 CWS Board Members traveling on official business, the CWS travel policy effective at
18 the time of Jerry Willey's official travel to Toronto and New Orleans in 2024 does not
19 appear to apply to Board Members. CWS does not have compensation agreements with
20 the Board Members, nor does CWS compensate Board Members directly for their
21 Board service. The information provided by CWS during this investigation indicates that,
22 before the Unified Sewerage Agency was renamed to Clean Water Services, the USA
23 Board of Directors passed Resolution and Order No. USA 99-48, and this Board Order
24 was never rescinded or repealed. The Board Order provides that "*officials and*
25 *employees on official business*" [emphasis added] are entitled to receive travel awards,
26 including frequent flyer miles. Christine Meadows, Senior Assistant Legal Counsel for
27 CWS, indicated that the Board Order was still in place for CWS officials in 2024. Thus,
28 personal frequent flyer rewards earned while traveling on CWS business were a part of
29 Jerry Willey's "official compensation package" as defined by OAR 199-008-0005(3).

30
31 ORS 244.040(2)(a) states that a public official obtaining a financial benefit included in
32 their official compensation package, as determined by their public body, does not violate

1 ORS 244.040(1). The information examined in this investigation indicates that frequent
2 flyer rewards earned by Jerry Willey when he traveled to Toronto and New Orleans in
3 2024 for CWS business, were included in his official compensation package. Thus, the
4 information does not indicate that Jerry Willey used his official position as Member of
5 the CWS Board to obtain a personal financial benefit or avoid a financial detriment that
6 would not have been otherwise available, or that he violated ORS 244.040(1).

7

8 Conflict of Interest

9 A public official is met with a conflict of interest when they take any action or make any
10 decision or recommendation in their official capacity which could or would result in a
11 private financial benefit or detriment of the person, their relative, or a business with
12 which they or their relative are associated.

13

14 As noted above, Jerry Willey, acting in his role as a CWS Board Member, traveled to
15 the Toronto, Canada in August 2024 and New Orleans in October 2024. When Jerry
16 Willey booked his own flights for CWS business, he included his personal frequent flyer
17 number to earn traveler rewards. As indicated by the Board Order and CWS attorney
18 Christine Meadows, any personal frequent flyer rewards earned by Jerry Willey as a
19 result of his official CWS travel appear to be part of his official compensation package
20 with CWS. Based on the information obtained in this investigation, there is not a
21 preponderance of evidence to believe that Jerry Willey took any actions or made any
22 decisions or recommendations in his official capacity for his own personal financial
23 benefit. Thus, Jerry Willey was not met with an actual or potential conflict of interest,
24 and he was not required to publicly announce any conflicts of interest or abstain from
25 participation in the matter pursuant to ORS 244.120(2).

26

27 **RECOMMENDATIONS:** The Oregon Government Ethics Commission should find that
28 there is not a preponderance of evidence in this case to establish that Jerry Willey
29 violated ORS 244.040(1) and ORS 244.120(2) and should order that the case be
30 dismissed. (Motion 7).

31 ///

32 ///

1 **ASSOCIATED DOCUMENTS:**

- 2 #PR1 Original Complaint received 6/24/2025
3 #PR2 Clean Water Services Board of Directors accessed 7/8/2025
4 #PR3 Willey Jerry CWS AP Invoice Distributions by Vendor received 7/7/2025
5 #PR4 CWS Travel Policy effective 3/1/2012
6 #PR5 Washington County Travel Policy amended 5/18/2021
7 #PR6 Memo of Phone Call with Tanya Ange on 8/6/2025
8 #PR7 Memo of Phone Call With Jerry Willey on 8/4/2025
9 #PR8 Jerry Willey Toronto IWA Conference Travel Documents submitted 9/17/2024
10 #PR9 Jerry Willey New Orleans Travel Documents received 8/8/2025
11 #IR1 25-354EAM Fai Nafisa PR dated 8/21/2025
12 #IR2 Fai Text Message on 7/30/2024
13 #IR3 CWS Informational Email received 12/4/2025
14 #IR4 Unified Sewerage Agency Board Order dated 10/5/1999
15 #IR5 CWS History accessed 12/15/2025
16 #IR6 CWS Travel and Training Policy updated 9/5/2025

PREPARED BY Joshua Sullivan 2/20/2026
Josh Sullivan Date
Investigator

APPROVED BY Susan V. Myers 2/20/2026
Susan V. Myers Date
Executive Director

REVIEWED BY Sean Brady 2/20/2026
Sean T. Brady Date
Senior Assistant Attorney General



Oregon

Tina Kotek, Governor

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February 20, 2026

Sent via email

Cathy Watt
The Chamber
cathy@medfordchamber.com

Re: Advice No. 26-083I

Dear Cathy Watt,

This letter of advice is in response to your request on the application of Oregon Government Ethics Law (Ethics Law) to the scenario provided. This analysis and advice is offered under the authority provided in ORS 244.284 as guidance on how the current provisions of Ethics Law may apply to the specific circumstances presented.

You are part of The Chamber of Medford and Jackson County (Chamber). The Chamber is holding the Southern Oregon Showcase (Showcase) on June 24-26, 2026. The Chamber would like to invite all 90 Legislators to attend this bi-partisan event. They plan to cover the hotel, meals, and ground transportation within Jackson County. This does not include travel to the event and only includes one hotel room per Legislator. The Chamber has provided an agenda (attached to the advice request) for the event. This includes touring several tourism businesses and community facilities in Jackson County. Based on this information, you would like to confirm that this qualifies as a gift exception for the Legislators.

Oregon legislators are public officials who must follow the provisions of Ethics Law. The gift provisions typically limit public officials in accepting gifts. A gift is defined to include something of economic value given to a public official without valuable consideration and which is not extended to others who are not public officials on the same terms and conditions. Specifically, they can only accept \$50 in a calendar year from sources that have a legislative interest in their actions. [ORS 244.025(1)]. There are exceptions to what is considered a gift. One exception is ORS 244.020(7)(b)(H). This allows a public official to accept reasonable food, travel or lodging expenses when they are representing state government, local government, or a special government:

- On an officially sanctioned trade-promotion or fact-finding mission, or
- In officially designated negotiations, or economic development activities, where receipt of the expenses is approved in advance.

Economic development activities are those that strengthen, expand, or enhance the economy. They are also activities that provide community development or cultural enhancement. Some examples could be promoting tourism, attracting business, or marketing opportunities. [OAR 199-005-0020(3)(d)].

A fact-finding mission or trip is any activity related to a cultural or education purpose. It is also any activity that provides intergovernmental assistance, such as international aid or sharing best practices, or developing intergovernmental relationships directly related to a public official's duties. The sponsor of a fact-finding mission should be directly associated with the event or location being visited. [OAR 199-005-0001(2)].

The agenda for the Showcase is over three days. Planned activities include touring the growing community and visiting local and tourism businesses. There is also a free day where legislators are encouraged to explore Medford County on their own. Based on that information, it appears that attending the Showcase could qualify as an economic development activity or a fact-finding mission.

The statute also requires such an activity to be officially sanctioned or designated. For members of the Legislative Assembly, the written approval required for the event to be "officially sanctioned or officially designated" 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)]. Thus, for them to accept the paid travel expenses, they would need to follow the procedures required by their respective Chambers to ensure that the event was officially sanctioned or designated.

The Legislators would be attending the Showcase in their official capacities, as representatives of the State. And the Showcase qualifies as an economic development activity or fact-finding mission. Thus, once the official sanction or designation is obtained, the Legislators could accept the food, travel and lodging under the ORS 244.020(7)(b)(H) gift exception.


Legislators are required to file a Statement of Economic Interest (SEI) annually. ORS 244.060(5) and (6) require 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) or (H). Thus, the Legislators will need to identify the event and source of paid travel expenses on their 2027 SEI. The Chamber, as the source paying the expenses, will need to provide each participating Legislator with written notice of the expenses paid.

Finally, provision of the paid expenses to the Legislators could qualify as lobbying per the definition in ORS 171.725(8). If the Chamber and its lobbyists/employees are not yet registered in the Electronic Filing System (EFS), this expenditure could trigger a registration requirement. The expenditure would also need to be reported in the Chamber's quarterly expenditure report for that period.

Cathy Watt
Advice Number 26-0831
February 20, 2026
Page 3

If you have any more questions about the application of Ethics Law, please feel free to contact me directly.

Sincerely,



Susan V. Myers
Executive Director

SVM/lt

*****DISCLAIMER*****

This staff advice is provided under the authority given in ORS 244.284(1). This opinion offers guidance on how Oregon Government Ethics Law may apply to the specific facts described in your request. This opinion 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

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Government Ethics Commission

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February 24, 2026

Jayne Pierce
League of Oregon Cities
1201 Court St. NE, #200
Salem, Oregon 97301-4194

Re: PML Training Assessment #25-114T

Dear Ms. Pierce:

The Oregon Government Ethics Commission (OGEC) originally approved the Public Meetings Law training provided by the League of Oregon Cities (LOC) on March 3, 2025. That original approval was for one year. This letter confirms that OGEC is extending its approval of the LOC's Public Meetings Law training by one year. This extension will expire on March 3, 2027.

As this Public Meetings Law training has been reviewed and approved by OGEC, a member of a governing body who attends and completes this training will satisfy the training requirement set forth in ORS 192.700.

There may be legislative changes to the Public Meetings Law made during the 2026 legislative session. OGEC will be updating its criteria for training approval after the 2026 legislative session and after any necessary rulemaking process resulting from legislative changes. At that point, LOC will need to update its Public Meetings Law training to reflect such changes and will need to submit its updated training to OGEC for review and approval. If, in the interim, you make any other changes to your training, including changes reflecting updated interpretations or guidance from OGEC, that updated training must also be resubmitted to OGEC for review and approval.

Please do not hesitate to contact this office if you have any questions or desire additional clarification regarding the training approval process.

Sincerely,

Susan V. Myers
Executive Director



Oregon

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February 24, 2026

Chad A. Jacobs
Beery Elsner & Hammond LLP
1804 NE 45th Avenue
Portland, Oregon 97213

Re: PML Training Assessment #25-119T

Dear Mr. Jacobs:

The Oregon Government Ethics Commission (OGEC) originally approved the Public Meetings Law training provided by the Beery Elsner & Hammond LLP (BEH) on February 20, 2025. That original approval was for one year. This letter confirms that OGEC is extending its approval of BEH's Public Meetings Law training by one year. This extension will expire on February 20, 2027.

As this Public Meetings Law training has been reviewed and approved by OGEC, a member of a governing body who attends and completes this training will satisfy the training requirement set forth in ORS 192.700.

There may be legislative changes to the Public Meetings Law made during the 2026 legislative session. OGEC will be updating its criteria for training approval after the 2026 legislative session and after any necessary rulemaking process resulting from legislative changes. At that point, BEH will need to update its Public Meetings Law training to reflect such changes and will need to submit its updated training to OGEC for review and approval. If, in the interim, you make any other changes to your training, including changes reflecting updated interpretations or guidance from OGEC, that updated training must also be resubmitted to OGEC for review and approval.

Please do not hesitate to contact this office if you have any questions or desire additional clarification regarding the training approval process.

Sincerely,

Susan V. Myers
Executive Director



Oregon

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January 27, 2026

Jennifer Quisenberry
Special Districts Association of Oregon
727 Center St NE, STE 208
Salem, OR 97301
jquisenberry@sdao.com

Re: PML Training Assessment #25-130T

Dear Jennifer Quisenberry,

This letter confirms that the Oregon Government Ethics Commission (OGEC) has reviewed and approved the Public Meetings Law training submitted by the Special Districts Association of Oregon (SDAO). The training was first submitted on February 14, 2025, and after revisions the final, approved version was submitted on January 27, 2026.

As indicated on its submission, the intended audience for the SDAO training is governing body members that are SDAO members. OGEC reviewed the training and confirmed that it includes all substantive requirements and best practices of Public Meetings Law as prescribed by OGEC as of the date of this approval letter. A copy of the completed training assessment form for this training is included with this letter.

The approval of this training is effective on January 27, 2026. The training approval will expire one year after this approval date, or sooner if any substantive changes are made to the Public Meetings Law statutes or Administrative Rules, or if the training content is changed. If any of these things occur, the training will need to be resubmitted to OGEC for approval.

As this Public Meetings Law training has been reviewed and approved by OGEC, a member of a governing body who attends and completes this training will satisfy the training requirement set forth in ORS 192.700.

Please do not hesitate to contact this office if you have any questions or desire additional clarification regarding the training approval process.

Sincerely,

Casey Fenstermaker
Compliance and Enforcement Coordinator

OGEC Public Meetings Law Training Assessment

Assessment ID:	Entity Submitting Training:	Dates Submitted:	Assessment Dates:
25-130T	Special Districts Association of Oregon (SDAO)	First Date Submitted: 2/14/25	1st Assessment: 2/25/25
		Revised Version 2 submitted: 4/28/25	2nd Assessment & Meetings 5/22/2025, 6/5/2025, 6/30/25
		Revised Version 3 submitted: 9/26/2025	3rd Assessment & Meeting: 10/6/2025
		Revised Version 4 submitted: 10/21/2025	4th Assessment: 11/4/25
		Revised Version 5 submitted: 11/10/2025	5th Assessment: 11/13/25
		First Video Version submitted: 12/23/2025	6th Assessment (Video Version): 1/9/2026
		2nd Video Version submitted: 1/15/2026	7th Assessment (Video Version): 1/26/2026
		Final Video Version submitted: 1/27/26	Final Video Version: 1/27/26
Materials Supplied:	Reviewed by:	Audience	Assessment Results:
Asynchronous Training: PDF Slides, Video Recording	OGEC Staff (Casey Fenstermaker, Stephanie Heffner)	Special Districts Association of Oregon - Governing body members	Has Required Information

The information in the ORS and OAR can be presented in any order. To meet the best practices, the training needs to address the following topics and questions:

Topics and Questions	Video Review	Assessment
Does the training cover the required provisions and content of the statutes and administrative rules?		Has Required Information
Does the training present the information correctly?		Has Required Information
Does the training provide references to the statutes and administrative rules in either the slides, trainer's narrative, handouts, or other written materials?	Yes. FYI when closed caption is on, it does sometimes cover the citations on the screen.	Has Required Information
Does the training provide an overview of the definitions?		Has Required Information
Answer: What bodies are governing bodies?		Has Required Information
Answer: What is a meeting?		Has Required Information
Answer: Who does the Public Meetings Law apply to? Who is responsible for ensuring Public Meetings Law is followed?		Has Required Information
Answer: What are the Public Meetings Law requirements (notice, accessibility, location, recordings, etc.)?		Has Required Information
Answer: What are the requirements for executive sessions?		Has Required Information
Is the content relevant to the audience?	Content is relevant for governing body members that are SDAO members.	Has Required Information
Does the training resources include speaker notes or script?	FYI, the speaker says the entire link for the AG Manual.	Has Required Information
Does the training cover resources if you have questions? Include OGEC's ability to give advice, the Attorney General's Public Records and Public Meetings Manual 2024, and seeking advice from legal counsel?		Has Required Information
Does the training reference/use the term "Public Meetings Law" correctly?		Has Required Information
Knowledge Check Slide 10:	Liz has been appointed to serve on a newly formed committee in her local transportation district. The committee's sole responsibility is to collect data about local traffic patterns and accident rates, which they will then provide to the Transportation Board. The committee has no authority to make recommendations or decisions about traffic improvements. Which statement is correct about Liz's committee?	Has Required Information

Knowledge Check Slide 18	The Springfield Park District has five members. Director Johnson is concerned about a new downtown development project. She calls Director Martinez to discuss her concerns, then emails Director Williams about the same issue. Later that day, she asks her assistant to relay her thoughts to Directors Baker and Chen. Through these separate communications, all council members have now discussed and formed opinions about the new park development project without ever meeting together. Are these communications allowed under the Public Meeting Law?	Has Required Information
Knowledge Check Slide 20	The Board of Directors for the local sanitation district is scheduled to attend a retirement party for a long-time employee. The administrative assistant in charge of scheduling is concerned because all members of the Board will be present, but public notice has not been posted. Which statement is correct about this situation?]	Has Required Information
Knowledge Check Slide 28	The Parks and Recreation Department needs to announce their upcoming budget meeting. The board secretary posts the meeting notice only on the doors of the department office, believing this is sufficient since most stakeholders don't attend anyway. Which statement best describes this notification approach?	Has Required Information
Knowledge Check Slide 41	During a board meeting for the local 9-1-1 Emergency Communications District, the board moves into executive session to discuss a disciplinary hearing against a public employee. The local newspaper reporter is asked to leave during this session, but the reporter protests that directive. Is the reporter correct to protest?	Has Required Information
Knowledge Check Slide 50	The Board of Directors for the local sanitation district is scheduled to attend a retirement party for a long-time employee. The administrative assistant in charge of scheduling is concerned because all members of the Board will be present, but public notice has not been posted. Which statement is correct about this situation?	Has Required Information

The training content needs to include the required content below. Some of the provisions may or may not apply to the governing bodies audience. The entity submitting the training has indicated if the training applies to the training audience. These topics are under the "Required When Applicable" sections.

Definitions

ORS 192.610 / OAR 199-050-0005

ORS / OAR	Required Content	Video Review	Assessment
ORS 192.610(1)	Convening		Has Required Information
ORS 192.610(2)	Decision		Has Required Information
ORS 192.610(3) OAR 199-050-0005(5)	Deliberation; Deliberate		Has Required Information
ORS 192.610(4)	Executive Session		Has Required Information
ORS 192.610(5)	Governing Body		Has Required Information
ORS 192.610(7) Originally ORS 192.610(6)	Public Body		Has Required Information
ORS 192.610(6) Originally ORS 192.610(7)	Meeting		Has Required Information
OAR 199-050-0005(1) OAR 199-050-0005(2)	Communicate; Communication		Has Required Information
OAR 199-050-0005(4)	Decision-Making Process		Has Required Information
OAR 199-050-0005(6)	Discussion		Has Required Information
OAR 199-050-0005(7)	Intermediary		Has Required Information
OAR 199-050-0005(9)	Quorum		Has Required Information
OAR 199-050-0005(10)	Serial Electronic Written Communication		Has Required Information

Policy

ORS 192.620

ORS / OAR	Required Content	Video Review	Assessment
ORS 192.620	Intent of Public Meetings Law		Has Required Information

Governing Bodies Subject to the Public Meetings Law

OAR 199-050-0010

ORS / OAR	Required Content	Video Review	Assessment
OAR 199-050-0010(1)(a)	Decision -Making Bodies		Has Required Information
OAR 199-050-0010(1)(b)	Advisory Bodies		Has Required Information

OAR 199-050-0010(2)(a)	Exception: Fact Gathering Bodies		Has Required Information
OAR 199-050-0010(2)(b)	Exception: Bodies Advising Individual Public Officials		Has Required Information
ORS / OAR	Required When Applicable	Video Review	Assessment
OAR 199-050-0010(2)(c)	Exception: Certain Multi-Jurisdiction Bodies		Has Required Information

Meetings Subject to the Public Meetings Law			
OAR 199-050-0015 / ORS 192.610 / ORS 192.630			
ORS / OAR	Required Content	Video Review	Assessment
OAR 199-050-0015(2)	Types of Meetings		Has Required Information
OAR 199-050-0015(3) ORS 192.610(7)(b)	Meetings PML does not apply to		Has Required Information
OAR 199-050-0015(4) ORS 192.630(2)	Quorum can't meet in private to decide or deliberate		Has Required Information

Public Meetings Law Exceptions			
ORS 192.690 / OAR 199-050-0015			
ORS / OAR	Required Content	Video Review	Assessment
ORS 192.690(1)(m)(A) OAR 199-050-0015(3)(c)(A)	Purely factual or education communications that convey no deliberation or decision on matters		Has Required Information
ORS 192.690(1)(m)(B) OAR 199-050-0015(3)(c)(B)	Communications unrelated to any matter that could come to governing body for deliberation or decision		Has Required Information
ORS 192.690(1)(m)(C) OAR 199-050-0015(3)(c)(C)	Nonsubstantive communications		Has Required Information
ORS / OAR	Required When Applicable	Video Review	Assessment
ORS 192.690(1) ORS 192.690(2)	Exceptions pertaining to the specific group being trained.		Not Applicable

Serial Communications Prohibited			
OAR 199-050-0020			
ORS / OAR	Required Content	Video Review	Assessment
OAR 199-050-0020(1)	Quorum of the governing body members cannot use serial communications to deliberate or decide on a matter		Has Required Information
OAR 199-050-0020(2)	Methods of Serial Communications		Has Required Information

Meeting Location & Telephone or Electronic Meeting			
ORS 192.630 / ORS 196.670 / OAR 199-050-0050			
ORS / OAR	Required Content	Video Review	Assessment
ORS 192.630(1)	Meetings open to public		Has Required Information
ORS 192.630(3)	Meeting Location: Discrimination		Has Required Information
ORS 192.630(4)	Meeting Location Requirements		Has Required Information
ORS 192.630(5)	Discrimination and Accommodations		Has Required Information
ORS 192.670(1) ORS 192.670(2) OAR 199-050-0050(2)	Meetings held through telephone or other means of electronic communication; real-time access for public		Has Required Information
ORS 192.670(3)(a) OAR 199-050-0050(3)	Public Access to Meetings by telephone, video or electronic means		Has Required Information
ORS 192.670(3)(b) ORS 192.670(3)(c) OAR 199-050-0050(5)	Submission of oral and written testimony by telephone, video or electronic means		Has Required Information
OAR 199-050-0050(4)	Methods of media attendance at executive sessions		Has Required Information
OAR 199-050-0050(6)	Public Access; Public Comment		Has Required Information
OAR 199-050-0050(7)	Presiding officer authority to keep order		Has Required Information

Noticing Requirements

ORS 192.640 / OAR 199-050-0040

ORS / OAR	Required Content	Video Review	Assessment
ORS 192.640(1) OAR 199-050-0040(4)(a)	Regular Meeting		Has Required Information
ORS 192.640(2) OAR 199-050-0040(3)(d)	Executive Sessions		Has Required Information
ORS 192.640(3) OAR 199-050-0040(4)(b)	Special Meetings	FYI 5:14 in Public Meetings & Public Bodies video and approved content in slide 21, the narratives match up. But nothing goes on the screen for the 24 hours noticing requirement for special meetings while the noticing requirement for regular meetings and emergency meetings both have something on screen.	Has Required Information
ORS 192.640(3) OAR 199-050-0040(4)(c)	Emergency Meetings		Has Required Information
OAR 199-050-0040(2)	Methods of providing notice to public, to interested persons, to media		Has Required Information
OAR 199-050-0040(3)(a) OAR 199-050-0040(3)(b) OAR 199-050-0040(3)(c)	Contents of Notice		Has Required Information

Recordings or Minutes Requirements

ORS 192.650 / OAR 199-050-0060

ORS / OAR	Required Content	Video Review	Assessment
ORS 192.650(1) OAR 199-050-0060(1) OAR 199-050-0060(3)	Minutes or recordings required; make available within reasonable time		Has Required Information
ORS 192.650(1)(a) - (e) OAR 199-050-0060(2)	Minutes/recording must give "true reflection" of matters discussed; required information		Has Required Information
ORS 192.650(2)	Minutes/recording of executive sessions		Has Required Information

State Boards & Commissions Electronic Meetings

ORS 192.672 / OAR 199-050-0065

ORS / OAR	Required When Applicable	Video Review	Assessment
ORS 192.672(1)	Telephone or electronic meetings		Not Applicable
ORS 192.672(3)(a)	Recording requirements		Not Applicable
ORS 192.372(3)(b)	Executive sessions		Not Applicable
ORS 192.672(3)(c)	Who it applies to		Not Applicable
OAR 199-050-0065(4)	30 Day posting requirement		Not Applicable

SB 1502: Effective January 1, 2025

Link to Enrolled Bill

ORS / OAR	Required When Applicable	Video Review	Assessment
Section 2 (1)(a) Section 2 (1)(b) Section 2 (1)(c) Section 2 (1)(d)	Who it applies to		Not Applicable
Section 2 (2)(a)	Video recording requirement		Not Applicable
Section 2(2)(b)	Video posting		Not Applicable
Section 2(3)	Posting exceptions		Not Applicable
Section 2(4)(a)	Executive session exception		Not Applicable
Section 2(4)(b)	Small school district exception		Not Applicable

Public Vote Requirement

ORS 192.650 / OAR 199-050-0055

ORS / OAR	Required Content	Video Review	Assessment
OAR 199-050-0055(1)	All official actions of governing body require public vote		Has Required Information
OAR 199-050-0055(2) ORS 192.650(1)(c)	Record vote of each governing body member		Has Required Information
OAR 199-050-0055(3)	No secret ballots		Has Required Information
OAR 199-050-0055(4)	Written ballots		Has Required Information

Executive Session

ORS 192.660 / OAR 199, Division 40

ORS / OAR	Required Content	Video Review	Assessment
ORS 192.660(1) OAR 199-040-0020(1)	Executive session authorization		Has Required Information
ORS 192.660(2)(f)	Exempt from public information or records		Has Required Information
ORS 192.660(2)(h) OAR 199-040-0050	Consultation with legal counsel		Has Required Information
ORS 192.660(4) ORS 192.660(5)	Media attendance		Has Required Information
ORS 192.660(6) OAR 199-040-0060	No final decision		Has Required Information
ORS 192.660(8) OAR 199-040-0015	General goals etc. How to go into/end executive session		Has Required Information Has Required Information
OAR 199-040-0020(2)	Executive session pre-requisites must be met.		Has Required Information
ORS / OAR	Required When Applicable	Video Review	Assessment
ORS 192.660(2)(a) ORS 192.660(7) OAR 199-040-0020(3) OAR 199-040-0027	Employment of public official		Has Required Information
ORS 192.660(2)(b) OAR 199-040-0020(3) OAR 199-040-0030	Dismissal/discipline of public official		Has Required Information
ORS 192.660(2)(c)	Functions of medical staff		Has Required Information
ORS 192.660(2)(d)	Labor negotiations		Has Required Information
ORS 192.660(2)(e)	Real property transactions		Has Required Information
ORS 192.660(2)(g)	Preliminary trade or commerce negotiations		Has Required Information
ORS 192.660(2)(i) OAR 199-040-0020(3) OAR 199-040-0030	Employment related performance review		Has Required Information
ORS 192.660(2)(j)	Public investments		Has Required Information
ORS 192.660(2)(k)	School safety plan		Not Applicable
ORS 192.660(2)(L)	Health regulatory board		Not Applicable
ORS 192.660(2)(m)	Landscape Architect Board		Not Applicable
ORS 192.660(2)(n)	Review and approval of security programs		Has Required Information
ORS 192.660(2)(o)	Safety of governing body and public body		Has Required Information
ORS 192.660(2)(p)	Cyber security		Has Required Information
ORS 192.660(3)	Labor negotiations		Has Required Information
ORS 192.660(9)	Public disclosure		Not Applicable

Responsibility of Governing Body Members & Annual Training Requirements

ORS 244.040 / 244.350 / 192.700 / OAR 199-050-0080

ORS / OAR	Required Content	Video Review	Assessment
ORS 244.350(6)(a)	Governing body members personal liability		Has Required Information
ORS 244.350(2)	\$1,000 Penalties		Has Required Information
ORS 244.040(7)	Cannot use public monies for penalties		Has Required Information
ORS 192.700(2)(a) OAR 199-050-0080(2) OAR 199-050-0080(3)	Annual training requirement		Has Required Information

Grievance Process & OGEC Enforcement

ORS 192.705 / OAR 199-050-0070 & ORS 192.685 / OAR 199-050-0075

ORS / OAR	Required Content	Video Review	Assessment
ORS 192.705(1) OAR 199-050-0070(2)	Filing Written grievance		Has Required Information
ORS 192.705(2) OAR 199-05-0070(3) OAR 199-05-0070(4)	Written grievances- 21 day response period		Has Required Information
ORS 192.705(2)(b)(A) ORS 192.705(2)(b)(B) ORS 192.705(2)(b)(C)	Three response options		Has Required Information
ORS 192.705(3) OAR 199-050-0070(5)	Send copy of response to OGEC		Has Required Information
ORS 192.685(2)	Grievance process requirement		Has Required Information
ORS 192.685(3)	Complaint documentation		Has Required Information
OAR 199-050-0075(2)	Complaint against all members of governing body		Has Required Information
OAR 199-050-0075(3)	Case Consolidation		Has Required Information
OAR 199-050-0075(4)	Procedural dismissals		Has Required Information

Lawsuits

ORS 192.680

ORS / OAR	Required Content	Video Review	Assessment
ORS 192.680(1)	Voidance of decision; reinstatement of decision		Has Required Information
ORS 192.680(2) ORS 192.680(5)	Circuit Court action; 60 day deadline		Has Required Information
ORS 192.680(3) ORS 192.680(4)	Circuit Court Orders; equitable relief; attorneys' fees		Has Required Information

OGEC Training Report

March Commission Meeting Facilitators

- **Room/Online Facilitator: Chris**
- **Participation Facilitator: Ruth**
- **Facilitation Lead/Media Contact: Stephanie**

Trainings Completed (January 27, 2026 – February 23, 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 244	Clackamas County Counsel	Online
ORS 192	Oregon Health & Science University (OHSU) Board of Directors	Portland
ORS 244	Multnomah Education Service District Staff	Online
ORS 244	Society of Government Meeting Professionals	Grande Ronde
ORS 192	City of Cove	Online
ORS 192	State Advisory Committee on Historic Preservation (SCHP)	Online
ORS 244	Oregon Parks and Recreation Commission	Online

OGEC Webinars (January 27, 2026 – February 23, 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	February
ORS 244	New Employee	1 Session
ORS 244	New Councilor or Commissioner	1 Session
ORS 244	Use of Office/Conflicts of Interest	
ORS 244	Gifts	1 Session
ORS 244	Jurisdictional Contact	7 Sessions

ORS 192	Public Meetings Law	3 Sessions
ORS 192	Executive Sessions	
ORS 171	Lobby Law	

Training Highlights

Staffing

We held interviews and finished the hiring process for a new trainer.

- Welcome Angela Nolan to the training team!

Public Meetings Law Trainings

We gave several Public Meetings Law trainings since we last saw the Commission, including for the:

- Board of the Oregon Health and Science University
- State Advisory Committee on Historic Preservation

Government Ethics Law Trainings

Chris also had several large presentations for Government Ethics Law trainings this past month, including for:

- Clackamas County Counsel
- Society of Government Meeting Professionals
- Oregon Parks and Recreation Commission

Training Requests

- Our training calendar is full through April and we are booking training requests for May and beyond. Many entities have already begun submitting their requests for this late summer and fall.

Communications

- Ruth has begun working on this year's first Ethics Matters Newsletter. Expect to see that at next month's meeting.

Statement of Interest (SEI) Preparation

SEI season is almost upon us and our team has been busy preparing:

- All trainers helped lead seven Jurisdictional Contact (JC) trainings this month to help JCs get their seat information submitted by the February 15th deadline.
- Ruth has led one of two staff trainings to prepare staff for SEI filing calls.
- Lex and Molly helped to create a way for staff to sign up for taking SEI calls.

Training Staff

Trainers

Chris Brubaker	503-378-2059	chris.brubaker@ogec.oregon.gov
Lex Tingey	503-378-2245	lex.tingey@ogec.oregon.gov
Ruth Sylvester	503-378-2060	ruth.sylvester@ogec.oregon.gov
Angela Nolan	971-754-5110	angela.nolan@ogec.oregon.gov

Administrative Support

Molly Putnam	503-378-5108	training@ogec.oregon.gov
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Curriculum and Training Coordinator

Stephanie Heffner	503-378-6802	stephanie.heffner@ogec.oregon.gov
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EXECUTIVE DIRECTOR'S REPORT
02/24/2026

Legislative Updates

- Three bills had public hearings and work sessions before the House Rules Committee this week. The Committee voted to forward HB 4159 and HB 4161 to the floor with a Do Pass recommendation. As HB 4177 has a fiscal, the Committee voted to refer it to the Joint Ways & Means Committee.

- House Bill 4159 amends ORS 244.250(1)(b) to specify that the Governor's appointee to the Commission must have experience in local government. The bill also amends ORS 40.225 to clarify that producing information to OGEC does not mean that the attorney-client privilege has been waived.

- House Bill 4161 adds two new exceptions to ORS 244.040(2) – one for food and beverages and another for swag/merchandise provided to a public official by a public body.

- House Bill 4177 makes various changes to the Public Meetings Law. These include:
 - a new definition of “deliberation” and changes to ORS 192.630(2).
 - changes to ORS 192.685 - eliminating the need for the PML dismissal cases and specifying that cases against the Commission must use the process in ORS 192.680.
 - adding new exceptions to ORS 192.690(1)(n), including one that exempts any communications made for the purpose of gathering information related to a decision that will be deliberated on or made.
 - expanding the number of governing body members subject to the mandatory training requirement.
 - Changing the grievance period from 30 days to 90 days and adding new cure provisions.
 - Amends ORS 244.260 to direct OGEC to hold the public body responsible for violations of ORS 192.630(3) (meeting locations), ORS 192.640 (notice), and ORS 192.650 (minutes/recordings).

- While OGEC is neutral on the bill, I have expressed concerns that some changes will allow governing body members to hold discussions and meetings in private.

- We are very grateful for the willingness of our Department of Justice Counsel, Dan and Sean, to assist our staff.

Staffing

The recruitment process for the open trainer position was completed. Angela Norton started on February 23, 2026. She is a welcome addition to the training team.