Oregon Government Ethics Commission Meeting Notice & Agenda

Meeting Date and Time: October 9, 2026, from 9:00 am to 2:00 pm

Join by Phone: (503) 446-4951 Conference ID: 667 295 76#

Join the meeting by Teams

Join in person: 3218 Pringle Rd SE, Salem, OR 97302, 2nd Floor Conference Room

Public Access and Accommodation Information: Commission meetings are open to the public, except for executive sessions. Meetings follow Oregon Public Meetings Law. Meeting recordings are published online after the meeting. Meeting end times are subject to change. The Commission may take items on the agenda in any order. After agenda items 1-5, the Commission may enter executive session.

To request a translator, interpreter, or other communication aids, please contact Becky Maison at (503) 378-6803 or becky.maison@ogec.oregon.gov. Submit accommodation requests at least 48 hours in advance.

Meeting Opening

Facilitated by Chair

1. Comments from the Chair
2. Comments from Commissioners
3. Review and Approve Minutes from the September 11, 2026 meeting (pg. 1)

Filing Penalty Waivers - Consent Calendar

The following requests for waivers have been placed on a consent calendar to receive a letter of education in place of a monetary penalty.

Posted to Website: 10/2/2026

Lobbyist Penalty Waivers

4. Serenas Campas – Rewiring America Inc. (pg.32)

Lobbyist Client Penalty Waivers

5. Samuel Breyer – Oregon Association of Education Service Districts (pg.33)

Statement of Economic Interest Penalty Waivers – None

Lobbyist Penalty Reductions - None

Lobbyist Client Penalty Reductions - None

Statement of Economic Interest Penalty Reductions - None

Stipulated Final Orders – Consent Calendar

6. Bob Wolverton – 25-531PCF – Ochoco West Water and Sanitation Authority (pg.35)
7. James Dunkin – 25-694PCF – Ochoco West Water and Sanitation Authority (pg.42)
8. Ross Scrocca – 25-695PCF – Ochoco West Water and Sanitation Authority (pg.49)
9. Mary Scrocca – 25-696PCF – Ochoco West Water and Sanitation Authority (pg.56)
10. Tammy Dennee – 26-453LJS – Lobbyist (pg.63)

Stipulated Final Orders - None

Default Final Orders – None

Reports of Investigation - None

Commission Advisory Opinions – None

Correspondence Received/Responses

No Action – For Review Only

Staff Advisory Opinions – None

Staff Advice – Informational Letters

11. Jin Lan – 26-608I – Oregon-China Sister State Committee (pg.67)
12. Kimberly Stuart – 26-623I – Washington County Sheriff's Office (pg.72)
13. Kevin Barton – 26-590I – Washington County District Attorney (pg.80)
14. Representative Jami Cate – 26-637I – Oregon Legislative Assembly (pg.84)
15. Travis Meuwissen – 26-644I – Hospital Association of Oregon (pg.87)

Public Meetings Law Training Approval Letters - None

Other Correspondence

16. Correspondence with Heather Van Meter (pg.90)

Miscellaneous Items

Facilitated by Staff

17. Memo re Delegation to Commission Chair and Vice Chair Authority to Act on Executive Director's COI disclosures (pg. 98)
18. Trainers' Report (pg.99)
19. Executive Director's Report (pg.102)

Executive Sessions

Facilitated by Chair

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

To consider Preliminary Reviews pursuant to the following authorities:

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

Adjournment

Note: The next Regular Meeting of the Oregon Government Ethics Commission is scheduled for Friday, November 13, 2026, at 9:00 a.m. in the 2nd Floor Conference Room of the Morrow Crane Building at 3218 Pringle Rd. SE, Ste 220, Salem, Oregon.

Oregon Government Ethics Commission

Commission Meeting Materials

October 9, 2026

Public Session

September 11, 2026
Draft Meeting Minutes

OREGON GOVERNMENT ETHICS COMMISSION

Meeting Minutes

September 11, 2026

9:00 a.m.

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

Executive Director Susan Myers, Compliance & Enforcement Coordinator Casey Fenstermaker, Curriculum & Training Coordinator Stephanie Heffner, Senior Operations Mgr. Becky Maison, and Investigators Sheetal Digari, Silas Patterson, and Daniel Pacheco were present in person. Trainers Angela Nolan, Lex Tingey, and Ruth Sylvester and Admin Staff Molly Putnum and Amber Heitz 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; Haleigh Kochanski, Register Guard; Jonas Olson and Bjorn Dahlen, Oregon Aviation News.

(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. None.

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

Public Session Item 2, Comments from the Commissioners. Commissioner Helt wanted to take a moment to honor the citizens and First Responders whose lives were lost on September 11, 2001. A moment of silence was taken.

Public Session Item 3, Approval of Minutes.
Commissioner McAuley moved the Commission approve the minutes for the August 14, 2026 meeting. Roll call was taken as follows: Janci, aye; Helt, aye; Givens, aye; McAuley, aye; Payne, aye. Motion passed. 5-0.

Chair Payne read the executive session script authorizing the executive sessions.
To consider information relating to whether the Commission should proceed to open cases on its own motion, per ORS 244.260(1)(b), ORS 244.260(2)(d) and ORS 192.660(2)(f), and
To consider Preliminary Reviews pursuant to the following authorities:

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

Chair Payne declared a conflict of interest for executive session agenda item #7. She stated it is not a statutory conflict of item but was interviewed and feels that it is not appropriate to be a witness and a decision maker. She also stated that she does appear before the respondents in her professional role but does not have

any matters currently pending in front of them, for executive session agenda items #34 and #36, but there is no statutory conflict and will not be recusing herself.

Helt stated she will be abstaining from voting on item #1 because the respondent is her Sheriff, though it is not a statutory conflict of interest. Helt wanted to disclose that executive session agenda item #31 as he is the mayor at her town; however, there is no statutory conflict of interest and will not be recusing herself.

Commissioner Metler joined the meeting.

EXECUTIVE SESSION

The Commission convened into Executive Session at 9:14 a.m.

(File 2)

Executive Session Consent Calendar - None

Reports of Preliminary Review

Facilitated by Investigators

Executive Session Item 1, Ty Rupert – 26-384EJS – Deschutes County
Presenter: Silas Patterson

Respondent Ty Rupert was present via Teams. Investigator Patterson presented the case and summarized the recommendation to move to investigation as it appears that Rupert used his position for personal campaign purposes, financial gain and violated prohibited use of office and conflict of interest provisions.

Commissioners Givens asked who the complainant was. Patterson stated it was Drew Brandt. Givens asked if the complainant had any relation with the Sheriff's

Office. Patterson stated he was unaware of any relationship.

Rupert addressed the Commission and stated he was appointed Sheriff in August of last year. He stated that he was learning on the go. He stated he wanted to apologize as he did not do anything intentionally to waste people's time. He stated that when he received a request from the media about his campaign, he wrote the response at home and forwarded it to his work address and had his colleague send the response to the media. He later spoke to counsel and was advised that going forward to send the emails himself, not through his colleague.

Givens asked if he was aware of the individual who made the complaint. Rupert stated that it appears he may be related to his opponent. Givens stated that he feels that this is a form of weaponization.

Chair Payne stated that regardless of the intent and motive, the Commission still must neutrally apply OGEC rules and laws to each situation. She referenced a statement that Rupert made regarding a town hall.

Commissioner McAuley asked Patterson if there was anything that he would like to look into should the case move to investigation. Compliance & Enforcement Coordinator Fenstermaker answered the question and advised that the case was Investigator Josh Sullivan's that Patterson was presenting on, but that they would be looking at issuing a Letter of Education and settling with a Stipulated Final Order.

Commissioner McAuley moved the Commission find there is a substantial, objective basis for believing that Ty Rupert 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: Givens, aye; Helt, abstain; Metler, aye; Janci, aye; McAuley, aye; Payne, aye. Motion passed. 5-0, 1 abstention.

Givens stated aye, but that he would prefer it to be just education.

Executive Session Item 3, Olivia Clark – 26-244ESP, 26-454DUP – City of Portland
Presenter: Silas Patterson

Respondent was not present. Investigator Patterson summarized the case and the recommendation to dismiss as it appears that Clark purchased a ticket to attend an event hosted by Metro. It had been alleged that Clark used her position to gain attendance.

Helt asked if Clark was at the event in her official capacity but didn't purchase the tickets, would it still be permitted? Patterson advised that if the tickets were purchased for her, it is likely that it would fall under one of the gift exceptions.

Commissioner McAuley moved the Commission to dismiss the complaint against Olivia Clark. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Payne, aye. Motion passed. 6-0.

Commissioner Jonathan Thompson joined the meeting at 9:35a.m. during the discussion of Kenna West's case. Thompson chose to abstain from voting as he missed part of the discussion.

Executive Session Item 4, Kenna West – 26-390EDP – City of Independence
Presenter: Daniel Pacheco
Respondent was not present. Investigator Pacheco presented the case and summarized the recommendation to dismiss the case. Pacheco explained that West was not involved in the hiring of the person and that the person lived in a separate dwelling on West's property which does not meet the definition of household member.

Commissioner Givens asked if there was only one candidate and one person who did the interviewing.
Commissioner Helt asked if there had been any investigation regarding the tax lot records to see if it was a separate dwelling and if mail was received separately. Investigator Pacheco said he did not look into that matter as it is not required since the dwelling did meet the other requirements such as detached, separate entrance, kitchen, bathroom, etc.

Commissioner McAuley moved the Commission to dismiss the complaint against Kenna West. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, abstain; Payne, aye. Motion passed. 6-0, 1 abstention.

Executive Session Item 5, Alexander Johnson II – 26-396EJS – City of Albany
Presenter: Silas Patterson
Respondent was not present. Patterson summarized the case and the recommendation to dismiss. The complaint alleged that Johnson was wearing clothing branded for his personal company during a city event. Patterson advised that other people were able to wear branded clothing and there was no financial gain by wearing the branded clothing.

Helt read from the guide and stated that public officials need to keep their personal businesses separate from their official duties but stated the case should be dismissed because public officials have their own lives and livelihoods.

Commissioner McAuley moved the Commission to dismiss the complaint against Alexander Johnson II. Roll call was taken as follows: Givens, aye; Helt, aye;

Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 6, Charles Guerri – 26-434EJS – City of Huntington

Presenter: Silas Patterson
Respondent Guerri was present via Teams. Investigator Patterson summarized the case and recommendation to dismiss. The complaint alleged Guerri used his position to display signs that violated city code. Patterson advised that the signs were placed before Guerri was in his position and the complaint was handled by other people in the city, not him.

Givens made a statement about signs being handled by the City and State. Director Myers advised that signage is not within OGEC's jurisdiction.

Guerri stated that he didn't have any statement but did want to add that the signs have been up for 6 years, one is on county property, and one is on city property. One of the signs was approved by the Fire Marshall that is near a fire hydrant. He is looking forward to having the case dismissed.

Commissioner McAuley moved the Commission to dismiss the complaint against Charles Guerri. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Multnomah County

Executive Session Item 11, Brandi Velasquez – 26-525PDP
Presenter: Daniel Pacheco
Respondent Velasquez via Teams. Investigator Pacheco summarized the cases and recommendation to move to investigate. This case involves a May 20

meeting where the committee voted to remove a committee member, the respondent Velaquez. It appears they violated multiple Public Meetings Law statutes regarding the May meeting.

Velasquez addressed the Commission and stated that she was blindsided by the others on the Board. She stated she logged into the meeting unaware of the true intent. She stated on May 15, she requested that board matters be placed on a public agenda and handled through proper transparent channels. She was blindsided when the meeting was used to present articles of impeachment against her. She stated that she objected on the record, stating that a vote was not allowed and disconnected. She requested that the Commission dismiss the complaint against her.

Thompson asked Pacheco to clarify as he thought the Commission advised people to leave meetings. Pacheco advised that with regards to executive sessions, yes, OGEC advises public officials to leave executive sessions, but this meeting was a private meeting, not an executive session.

Payne asked a question regarding how to leave a private meeting after they realize a quorum exists and how do they avoid that violation? Myers stated that Velaquez was in a difficult situation, because the meeting should have an a properly announced and noticed executive session, and had it been done that way, her announcing and leaving would have been in accordance with OGEC's previous guidance. That it wasn't, once she received notice of the meeting, she should not have participated or attended. As essentially, once you are a part of the communications, you are a part of the quorum that is holding the illegal meeting.

Helt asked Velaquez why she chose to attend the meeting and what she expected to happen when she was asked to attend the meeting. Velaquez stated it was important to attend the meeting as she didn't know what the meeting was going to entail and she wanted to find out what was happening.

Helt asked if she knew there was a quorum and if she had a choice. Velaquez stated that she knew there would be a quorum with her joining the meeting. She had requested the agenda and knew it was not posted.

Commissioner Givens asked if the meeting was noticed publicly. Susan said no, this is why it was not an executive session.

Velaquez was temporarily excused from the meeting.

Executive Session Item 8, Darrell Wade – 26-415PDP
Executive Session Item 9, Dani Slyman – 26-416PDP
Executive Session Item 10, Monique Johnson – 26-417PDP
Presenter: Daniel Pacheco
Respondent Slyman was present via Teams. Respondent Wade was present via the telephone. Respondent Johnson was not present. Investigator Pacheco summarized the cases and recommendation to move to investigation. These cases involve a May 20th meeting where the committee voted to remove a committee member. It appears they violated multiple Public Meetings Law statutes with regards to the meeting and may have had a serial meeting prior to the May 20th meeting, which would require additional investigation.

Wade addressed the Commission and asked that the Commission dismiss the complaint because the meeting was held in good faith. He stated no action was

taken and the respondent was able to address the Committee at a later date when final action was taken.

Slyman addressed the Commission and stated that they would like to express similar words as Wade. They stated it was taken on as good faith. They stated they followed legal counsel direction to fulfil Public Meetings Law, and the board has tried to show up continuously.

Givens asked why the meeting was not publicly noticed. Chair Payne reiterated the question for the respondents and clarified it was regarding the May 20th meeting. Wade stated that their counsel stated that when dismissing a board member it is not publicly noticed. Givens clarified that it was on advice from their legal counsel.

Thompson stated he was very concerned about their legal advice, and he would like to move forward with the investigation so he can see the advice. He is very concerned as executive sessions exist for this reason. Wade stated that it was an executive session. Thompson stated that executive sessions are required to be noticed, and this meeting was not noticed. Thompson explained that executive sessions are required to be properly noticed with the correct citation and timeline and can still be private, but the public still needs to be advised they are happening.

Payne stated that she too is concerned and this is a great opportunity for education.

Executive Session Item 8, Darrell Wade – 26-415PDP

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Darrell Wade may have violated ORS 192.630, ORS 192.640, ORS 192.670, OAR 199-050-0015 and OAR 199-050-0020 and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 9, Dani Slyman – 26-416PDP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Dani Slyman may have violated ORS 192.630, ORS 192.640, ORS 192.670, OAR 199-050-0015 and OAR 199-050-0020 and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 10, Monique Johnson – 26-417PDP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Monique Johnson may have violated ORS 192.630, ORS 192.640, ORS 192.670, OAR 199-050-0015 and OAR 199-050-0020 and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Respondent Brandi Velasquez rejoined the meeting to hear decision on her case.

Executive Session Item 11, Brandi Velasquez – 26-525PDP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Brandi Velasquez may have violated ORS 192.630, ORS 192.640, ORS 192.670, OAR 199-050-0015 and OAR 199-050-

0020 and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Multnomah County

Executive Session Item 12, John Connelly – 26-418PDP

Executive Session Item 13, Patrick Thomas – 26-419PDP

Executive Session Item 14, Yalila Alcaraz – 26-420PDP

Executive Session Item 15, Christine Aavedal – 26-421PDP

Executive Session Item 16, Nicholas Hayes – 26-422PDP

Presenter: Daniel Pacheco

Respondents were not present. Investigator Pacheco summarized the cases and the recommendation to dismiss. He advised the respondents were not present at the May 20 meeting so did not violate Public Meetings Law.

Executive Session Items 12-16, 26-418PDP, 26-419PDP, 26-420PDP, 26-421PDP, and 26-422PDP

Commissioner Thompson moved the Commission dismiss the cases against John Connelly, Patrick Thomas, Yalila Alcaraz, Christine Aavedal, and Nicholas Hayes. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

The Commission recessed for a break from 10:21 a.m. to 10:28 a.m.

City of Hillsboro

Presenter: Daniel Pacheco

Executive Session Item 17, Rob Harris – 26-437XDP

Executive Session Item 18, Olivia Alcaire – 26-446XDP

Executive Session Item 19, Elizabeth Case – 26-447XDP

Executive Session Item 20, Kipperlyn Sinclair – 26-449XDP

Executive Session Item 21, Saba Anvery – 26-450XDP

Executive Session Item 22, Cristian Salgado – 26-451XDP

Respondents were not present. Investigator Pacheco summarized the cases and recommendation to move to investigation. The complaint notes that the respondents denied access to executive session on the basis that the complainant was not media. Based on the information provided to OGEC, it appears that the complainant meets the definition of media and the case should move to investigation.

Helt wanted to highlight the importance of independent media and the need for a new definition of media by the Attorney General.

Executive Session Item 17, Rob Harris – 26-437XDP

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Rob Harris may have violated ORS 192.660(4), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 18, Olivia Alcaire – 26-446XDP

Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Rob Harris may have violated ORS 192.660(4), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 19, Elizabeth Case – 26-447XDP

Commissioner Thompson moved the Commission find there is a substantial,

objective basis for believing that Elizabeth Case may have violated ORS 192.660(4), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 20, Kipperlyn Sinclair – 26-449XDP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Kipperlyn Sinclair may have violated ORS 192.660(4), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 21, Saba Anvery – 26-450XDP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Saba Anvery may have violated ORS 192.660(4), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 22, Cristian Salgado – 26-451XDP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Cristian Salgado may have violated ORS 192.660(4), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Lane County School District

Presenter: Silas Patterson
Executive Session Item 26, Nicole De Graff – 26-412PSP

Respondent De Graff was present via Teams. Patterson summarized the case and advised the complaint alleged the Board violated Public Meetings Law when considering the hiring of a new superintendent by holding an executive without satisfying the mandatory prerequisites set forth in ORS 192.660(7)(d).

De Graff addressed the Commission and asked that the Commission review each action separately. She asked the Commission to consider who received legal advice and who didn't and who the advice was shared with and what authority they possess. She stated that she has since resigned from the Board and was not the Chair, did not approve or sign off on the grievance response, control the agendas or have the authority to call the meetings or direct the search firm. She offered to review proposals because she was concerned about how the earlier process unfolded and she always tried to produce a proper public process. She explained she had questioned the process back in February and then in the May meeting, she asked that they stop and hold a public meeting. She thought the meeting had been properly noticed and thought it was authorized. She asked that the Commission determine what legal guidance, if any board leadership obtained, when it was obtained, who received it, and if it was shared by the full board.

Givens asked why the Board did not use COSA (Coalition of Oregon School Administrators). De Graff stated they put out a request for proposal, but they did not apply.

Payne asked why she had any basis to believe the executive session was improper, why she attended the meeting and she did not leave. De Graff answered that with the first investigation, she didn't think it was improper. She said it was very confusing and she wanted the public process to be more transparent as things were happening outside of the meeting between the chair

and search firm that she did not know about until she did a public records request. She stated that she didn't have any reason to believe at the time that she shouldn't be there.

Givens asked if the Board established a search committee or put out a notice for applicants. He asked if the district has an assistant superintendent to help with the hiring process.

De Graff said the assistant superintendent left at the same time. She advised they had an acting one for 4 months, so they did not have a search committee or an assistant superintendent. She stated it was the chair, legal counsel, and the search firm. They did hire a search committee through the RFP process.

De Graff temporarily left the meeting.

Lane County School District

Presenter: Silas Patterson
Executive Session Item 23, Jonathan Light – 26-401PSP
Executive Session Item 24, Ken Kohl – 26-410PCF
Executive Session Item 25, Amber Langworthy – 26-411PSP
Executive Session Item 27, Brent Brew – 26-413PSP
Respondent Kohl was present via Teams. Respondents Light, Langworthy, and Brew were not present. Patterson summarized the cases, he explained that it appears the respondents violated Public Meetings Law as they considered employment of a superintendent without satisfying the mandatory requirements of ORS 192, including adopting hiring standards, criteria, and policy specific to the superintendent position.

Kohl addressed the Commission and stated that they have a policy that the

Board adopted previously that covers general hiring policies. He stated there is a CBA for the duties of the Superintendent and was presented to the public. He stated he is unclear about the qualifications of an acting or interim or regular superintendent. He stated they should be the same qualifications.

Given asked if the sessions were publicly noticed by the district. Kohl stated based on his recollections, he believes so, yes. They discussed the general hiring policy and that he was not an HR expert.

Helt asked about the process of setting up the procedures. Helt asked if they went over the procedures as a board or if they were generically approved. Kohl asked for clarification. Helt stated there is a process that is called out in the ORS and she was referring to that. Kohl asked for the specific ORS. Helt stated ORS 192.660. Myers interjected and clarified she was referring to ORS 192.660(2)(a) and the hiring prerequisites. Kohl stated that it appears to him that they met the prerequisites.

Payne stated that they sent out a community stakeholder survey and asked about the difference between the process for an interim superintendent and permanent superintendent.

Kohl stated that the survey helped inform the board on who to select for the interim superintendent. He believed the process was the same for both the interim and permanent superintendents.

Payne asked if this was done for the hiring of all employees. Kohl stated he was not sure that the board hires all employees. Payne asked if it was done for all superintendents. Kohl stated that with the prior superintendent, they had two weeks to get an acting superintendent, and then to hire an interim superintendent

to finish out the school year. He stated the standards have not changed.

Thompson stated that he appreciates Kohl's testimony and he would love to have OGEC's investigator to dig into it to find out if it does meet the prerequisites. Givens stated that the investigator should additionally investigate the questionnaire that was sent out. Payne stated that she agrees with both sentiments.

Executive Session Item 23, Jonathan Light – 26-401PSP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Jonathan Light may have violated ORS 192.660(7)(d)(B), ORS192.660(7)(d)(D), and ORS 192.660(2)(a), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 24, Ken Kohl – 26-410PCF
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Ken Kohl may have violated ORS 192.660(7)(d)(B), ORS192.660(7)(d)(D), and ORS 192.660(2)(a), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 25, Amber Langworthy – 26-411PSP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Amber Langworthy may have violated ORS 192.660(7)(d)(B), ORS192.660(7)(d)(D), and ORS 192.660(2)(a), and that the Commission should investigate accordingly. Roll call was taken as follows:

Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 27, Brent Brew – 26-413PSP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Brent Brew may have violated ORS 192.660(7)(d)(B), ORS192.660(7)(d)(D), and ORS 192.660(2)(a), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Respondent De Graff rejoined the meeting to hear decision on her case.

Executive Session Item 26, Nicole De Graff – 26-412PSP
Commissioner Thompson moved the Commission find there is a substantial, objective basis for believing that Nicole De Graff may have violated ORS 192.660(7)(d)(B), ORS192.660(7)(d)(D), and ORS 192.660(2)(a), and that the Commission should investigate accordingly. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Oregon Commission on Judicial Fitness and Disability
Presenter: Casey Fenstermaker
Executive Session Item 28, Anton Loef – 26-400PCF
Executive Session Item 29, Kevin Kebede-Berhanu – 26-402PCF
Executive Session Item 30, Cashnita Spencer – 26-403PCF
Executive Session Item 31, Melanie Kebler – 26-404PCF
Executive Session Item 32, Darlene Pasieczny – 26-405PCF
Executive Session Item 33, Louis Santiago – 26-406PCF

Executive Session Item 34, Cheryl Albrecht – 26-407PCF

Executive Session Item 35, Lung Hung – 26-408PCF

Executive Session Item 36, Anna Joyce – 26-409PCF

Respondents were not present. Fenstermaker summarized the cases and the recommendation to dismiss as the case review meetings appear to qualify for the judicial proceeding exception in ORS 192.690(1).

Commissioner Thompson moved the Commission dismiss the cases against Anton Loef, Kevin Kebede-Berhanu, Cashnita Spencer, Melanie Kebler, Darlene, Pasieczny, Louis Santiago, Cheryl Albrecht, Lung Hung, and Anna Joyce. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 2**,** Cheri Stewart – 26-397ESP, 26-423EDP – Klamath County

Presenter: Daniel Pacheco

Respondent Stewart was present via the telephone. Patterson summarized the case and the recommendation to move to investigation as it appears Stewart violated Oregon Ethics Law with regards to declaring conflicts of interest. The complaint alleged that Stewart was signing checks for her relatives, was involved in the hiring of her relative, and entered her own checks into QuickBooks and did not declare proper conflict of interest statements with regards to processing her salary. Pacheco stated the claims of nepotism appear to not be a violation but is recommending investigation for conflicts of interest.

Stewart addressed the Commission by acknowledging the Investigator’s findings in summary and identified one procedural question regarding entering in council approved salary data. She stated that payroll is processed automatically and does not change her pay unless explicitly authorized. She stated that she

believes that processing her salary is ministerial and does not need a conflict-of-interest statement but would be willing to adopt that process should the Commission require it.

Givens asked if there were many applicants when it came to the recruitments, and if there was a process. Stewart stated there was a process that they followed by LOC (League of Oregon Cities). Givens asked if there was a question about brother/sister brought up regarding LOC. Stewart asked to clarify if he was asking about her hiring or Anne's hiring. Givens stated Anne's hiring process. Stewart stated that another applicant was originally selected and she had started training them, but they chose not to take the job and then the hiring committee chose Anne.

Helt stated that she has some concerns moving the case forward for other small towns and their payrolls. She stated that it is very important to not add additional steps and this is data entry. She stated cities need to be able to pay people, and it should not be an arduous process. She stated the case should be dismissed.

Givens asked about the payment schedule. He asked if it was their livelihood. He asked the salaries for her position and Anne's position. Helt asked if the salary was relevant. Payne agreed that the salary might not be relevant and wanted to reiterate that this case is being recommended for dismissal as the definition of relative has not been met. Givens stated that he wanted to know because he was curious if the complaint was based around people being upset about missing out. Stewart stated her salary is $3,706 and the recorder is $1,400.

Thompson stated that he is trending towards dismissing the case. Payne stated that she is trending towards dismissing as well. Givens also agreed to not move forward.

Commissioner Thompson moved the Commission dismiss the complaint against Cheri Stewart. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Executive Session Item 7, Susan Myers – 26-435EBM – Oregon Government Ethics Commission
Presenter: Jason Robinson & Dan Gilbert
Respondent Myers was present in person. Investigator Robinson and Gilbert were present via Teams.
Chair Payne chose to recuse herself from the discussion and vote.
Robinson summarized the complaint and his recommendation to dismiss. He stated the complaint alleges Myers violated Ethics Law by not declaring a conflict of interest when assigning a case to herself concerning an OGEC Commissioner. He stated that it appears it was not a conflict of interest as no single Commissioner can dismiss the Executive Director. He stated the finding was verified by DAS HR that hires Statewide Executive Directors, and helps terminate them, as well as the Senior Operations Manager for the Commission and the chair of the Commission.

Myers stated she wanted to thank all those involved in this case. Myers addressed the Commission and wanted to reiterate that she does not believe she had a conflict of interest. She stated she understands why the complainant may have thought that. Myers added that she did not believe this was a complaint made in bad faith or a weaponization of the complaint process. She stated that optics are understandable as to why the complaint was filed and regret this matter cost time and resources. She stated that she would bring a proposal to the next meeting on how to address conflicts of interest for executive directors.

Commissioner McAuley moved the Commission to dismiss the complaint against Susan Myers. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, abstain. Motion passed. 6-0, 1 abstention.

(FILE 3)

Own Motion Preliminary Reviews

Payne reminded Media that they are not allowed to share the details of the Own Motion Preliminary Reviews, and the video and audio recordings will not be posted on OGEC's website.

Executive Session Item 37, Possible Own Motion Preliminary Review, re: ORS 244

Myers explained the process concerning own motions and why own motions are held in this confidential manner. Myers explained the possible own motion recommendation which is to dismiss based on information provided by the public official after notification about the own motion.

The public official in question addressed the question and stated the process of complaints with OGEC continues to be weaponized.

No action was taken by the Commission.

(FILE 4)

Reconvene Regular Open Session

The Commission adjourned the Executive Session at 11:50 a.m.

Filing Penalty Waivers – Consent Calendar

Lobbyist Penalty Waivers - None

Lobbyist Client Penalty Waivers

Public Session Item 4, George Fox University

Statement of Economic Interest Penalty Waivers

2026 SEI Reports

Public Session Item 5, Charlie Ross – Primary Candidate for State Rep.

Commissioner Thompson moved the Commission approve the filing penalty waivers as presented on the Consent Calendar (Items #4 - #5). Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.
Motion was made twice for clarification purposes.

Filing Penalty Reductions

Lobbyist Penalty Reductions

Public Session Item 6, Cameron Herrington – Neighborhood Partnerships
Director Myers summarized the recommendation.
Commissioner Thompson moved the Commission approve the recommended filing penalty reduction in this matter. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Public Session Item 7, Dana Turell – Turell Group
Director Myers summarized the recommendation.
Commissioner Thompson moved the Commission approve the recommended filing penalty reduction in this matter. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Lobbyist Client Penalty Reductions

Public Session Item 8, Turell Group

Director Myers summarized the recommendation.

Commissioner Thompson moved the Commission approve the recommended filing penalty reduction in this matter. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Statement of Economic Interest Penalty Reductions

Public Session Item 9, Maureen McCormmach – Pilot Rock

Director Myers summarized the recommendation.

Commissioner Thompson moved the Commission approve the recommended filing penalty reduction in this matter. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Stipulated Final Orders – Consent Calendar

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

Public Session Item 10, David Loveall – 26025EJS – Lane County

Public Session Item 11, Pamela Brown – 26-038EDP – City of Shaniko

Public Session Item 12, Michael Papin – 25-525PCF – Ochoco West Water and Sanitary Authority (OWWSA)

Public Session Item 13, Dan Parks – 25-526PCF – OWWSA

Public Session Item 14, Richard Lopez – 25-527PCF – OWWSA

Public Session Item 15, Tony Sneath – 25-528PCF – OWWSA

Public Session Item 16, Mitch Logan – 25-529PCF – OWWSA

Public Session Item 17, Aiden Humphrey – 25-530PCF – OWWSA

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

Stipulated Final Orders

Public Session Item 18, Trampas Bergstrom – 25-086ELG – Yamhill Fire Protection District
Presenter: Silas Patterson
Respondent was not present. Patterson summarized the case and the proposed Stipulated Final Order.

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

Public Session Item 19, Chris Schull – 26-011EJS – Tumalo Irrigation District
Presenter: Silas Patterson
Respondent was present via Teams. Patterson summarized the case and the proposed Stipulated Final Order.

Shull addressed the Commission and stated that it has been interesting process for him. He sees where the challenge comes from and he gets taxed on it and he

is okay with the decision. He appreciates the help from the investigators, and they are easy to work with.

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

The Commission recessed from 12:07 p.m. to 12:30 p.m.

Default Final Orders - None.

Reports of Investigations

Tumalo Irrigation District

Public Session Item 20, Ron Cochran – 26-053XJS
Public Session Item 21, Martin Warbington – 26-054XJS
Public Session Item 22, Steve Putnam – 26-055XJS
Public Session Item 23, Carol Shull – 26-056XJS
Public Session Item 24, Ed Galazzo – 26-057XJS
Presenter: Josh Sullivan

Respondents were not present. Attorney Katie Clavere was present via Teams. Sullivan summarized the cases and the recommendation to dismiss. The complaints alleged violations of Public Meetings Law on December 9 and engaged in topics unauthorized by the cited executive session provisions. Sullivan advised that it appears that they did not violate Public Meetings Law on December 9, based on the information provided by the board members, the legal memo, exhibits provided, and minutes.

Public Session Item 20-24, 26-053XJS, 26-054XJS, 26-055XJS, 26-056XJS, & 26-057XJS

Commissioner Thompson moved the Commission dismiss the complaints against Ron Cochran, Martin Warbington, Steve Putnam, Carol Shull, and Ed Galazzo. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Commission Advisory Opinions – None.

Correspondence Received/Responses

No Action – For Review Only

Staff Advisory Opinions - None.

Staff Advice – Informational Letters

Public Session Item 25, Bridger Lanning – 26-545I – Legislative Advocates Government Affairs

Public Session Item 26, Kevin Barton – 26-564I – Washington County District Attorney

Public Session Item 27, Kevin Barton – 26-593I – Washington County District Attorney

Public Session Item 28, Michael Magee – 26-566I – Waymo

Public Session Item 29, Rep. Mark Owens – 26-583I – Oregon Legislative Assembly

Public Session Item 30, Sen. Anthony Broadman – 26-591I – Oregon Legislative Assembly

Public Meetings Law Training Approval Letters

Public Session Item 31, SDAO – 25-172T – Training Approval Extension

Public Session Item 32, Port of Portland – 25-173T – Training Approval Extension

Public Session Item 33, OCCA – 25-404T – Training Approval Extension

Other Correspondence

Public Session Item 34**,** Correspondence with Sharon Barker, re: 26-315PJS, 26-316PJS, 26-317PJS

No action taken by the Commission.

Miscellaneous Items

Facilitated by Staff

Public Session Item 34A, Request for Extension, Commission Advisory Opinion, 26-619A

Director Myers explained the request for extension as the deadline is in approximately two weeks and staff could not get the Opinion completed in time for the September meeting.

Commissioner Thompson moved the Commission extend the period for completion of the Commission Advisory Opinion by a period not to exceed 60 days. Roll call was taken as follows: Givens, aye; Helt, aye; Metler, aye; Janci, aye; McAuley, aye; Thompson, aye; Payne, aye. Motion passed. 7-0.

Public Session Item 35, Trainers' Report

Stephanie Heffner, Curriculum & Training Coordinator, advised of the training team's activities since the last commission meeting. She explained that the Oregon Fire Chiefs Association wants to partner with OGEC and hopes to add

trainings across the state, including fire districts, cities, school boards, and other special districts.

Public Session Item 36, Executive Director's Report

Myers summarized the agency's activities since the last meeting in August. She has been meeting with various associations and working on setting up smaller workgroup sessions. She addressed the Legislative Workgroup headed by Representative Sosa. She stated that enforcement was a recent topic at the workgroup and at the next meeting she is going to suggest a new way to enforce Public Meetings Law, by removing it from ORS Chapter 244. She would like to create an assessment period to review if a public body has cured an alleged violation.

Myers introduced Amber Heitz, the new Administrator Specialist 1. Heitz waved and said HI to the Commissioners.

Maison reminded Commissioners of the Best Practices survey to complete as a part of the agency's Annual Key Performance Measures.

Given asked about the quarterly meeting with the various associations. Myers stated that both Maison and her are working out dates.

Helt stated she wanted additional information from the training team on training data.

Helt stated that the iPads are helpful but would like a mouse to continue to make things easier. She stated she would like to clarify things for Public Meetings Law, especially regarding the ambulance situation, before the Legislative Session.

Myers stated that OGEC has a meeting with AOC before the Legislative Session and would try to issue an FAQ to help address that issue ahead of time.

Helt stated there was a typo in the minutes on page 46. Myers stated that it would be fixed.

The Commission adjourned the meeting at approximately 12:55 p.m.

The next regularly scheduled Commission meeting will be October 9, 2026, at 3218 Pringle Road SE, Suite 220, Large Conference Room, Floor 2, Salem, Oregon 97302.

DRAFT

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July 28, 2026

Oregon Government Ethics Commission
3218 Pringle Road SE
Suite 220
Salem, OR 97302-1544

Re: Serenas Campas Q2 Report Late Fee Waiver Request

Dear Ms. Foster,

As Counsel to Rewiring America, Inc. ("Rewiring"), I write on behalf of their former lobbyist Serena Campas, who ceased providing lobbying services on March 31, 2026 when she ended her employment relationship with Rewiring.

At the time of her termination, her Rewiring email address was no longer monitored and was functionally deactivated. As such, we did not receive the notice you kindly provided regarding the Q2 report still due as a result of the termination being submitted in April 2026. This was an entirely inadvertent administrative error due to being new to Oregon lobbyist reporting and was addressed within hours of being notified by Serena of the late filing.

We sincerely apologize for any inconvenience and request a waiver of penalties for this inadvertent late filing and first time offense. If there is any additional information we can provide to resolve this issue, please let me know.

Thank you very much for your assistance.

Sincerely,

Lucy Xiong

- **Past Violations: None**
- **Current Penalties: $10** SVM
- **Recommendation: 1st violation - Letter of Education**

Samuel Breyer
Executive Director
Oregon Association of Education Service Districts
sam@oaesd.org

August 14, 2026

Oregon Government Ethics Commission
3218 Pringle Rd. SE, #220
Salem, OR 97302-1544

RE: Request for Reduction or Elimination of Fine for OAESD

To the Oregon Government Ethics Commission:

I am writing to formally request a reduction or elimination of the civil penalty of $120 assessed to our agency in the notice dated July 27, 2026 regarding late filing of lobbyist reports. As the executive director for the Oregon Association of Education Service Districts, I take our ethical and reporting obligations very seriously and regret the oversight that led to this penalty.

We respectfully ask the Commission to consider the following mitigating circumstances and justification for this request:

In June 2026, our small organization underwent both a change of fiscal agent and our email platform. On June 30 we fully transitioned from our previous platforms to both new physical and email addresses. Unfortunately, I neglected to update the notification email associated with our account and did not receive the reminder notices at my new address. Additionally, the backup plan for such missed transmissions failed when expected forwarding from our previous email provider did not perform as expected. As a result, we did not receive the previous notices of late filing until Oregon Government Ethics Commission staff reached out directly on the phone number on file which was located with our previous organization. When staff returned from a vacation and discovered the notice, it was forwarded to me and I immediately contacted the number provided on July 24, 2026. I then rectified our error as soon as possible, completing the reporting process on Monday, July 27.

I offer this as an explanation, not an excuse. I have completed the reports consistently on time since becoming executive director in 2025 and accept full responsibility for the oversight. Since this occurrence, our organization has implemented new internal protocols to ensure all future filings are completed well in advance of the statutory deadlines. Specifically, we have added these requirements to our quarterly calendar and assigned secondary administrative oversight to prevent any recurrence of this issue.

As a not-for-profit organization supporting Oregon education service districts in their mission to serve our local students and communities, we appreciate your consideration of this request.

Additionally, and unrelated I would like to mention the exceptional communication and customer service provided by Jessica Foster while I worked to rectify my error. She was helpful in guiding me to a quick correction of my oversight.

Sincerely,

Samuel G Breyer

Samuel G. Breyer

- **Past Violations: 2024, Q1 $50 paid**
- **Current Penalties: 2026, Q2 $120** SVM
- **Recommendation: 2nd violation - reduction to $20**

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of: **Bob Wolverton** Case No.: **25-531PCF**	**STIPULATED FINAL ORDER**

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1. Purpose:

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

2. Jurisdiction:

A. Bob Wolverton is a Member of the Ochoco West Water and Sanitation Authority (OWWSA) Board of Directors (Board). As such, they are a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Public Meetings Ethics Law found in ORS Chapter 192.

B. On December 12, 2025, the Commission considered information in the preliminary review phase of Case No. 25-531PCF and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 244.020(10)(a) defines “legislative or administrative interest” to include an economic interest, distinct from that of the general public, in any matter subject to the decision or vote of the public official acting in the public official’s capacity as a public official. ORS 192.640(1) explains that “[t]he governing body of a public body shall provide for and give public notice, reasonably calculated to give actual notice to

interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

B. ORS 192.640(3) states that "[n]o special meeting shall be held without at least 24 hours' notice to the members of the governing body, the news media which have requested notice and the general public. In case of an actual emergency, a meeting may be held upon such notice as is appropriate to the circumstances, but the minutes for such a meeting shall describe the emergency justifying less than 24 hours' notice."

C. ORS 192.660(2)(a) allows the governing body of a public body to hold an executive session "[t]o consider the employment of a public officer, employee, staff member or individual agent."

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

E. OAR 199-040-0020(3) prohibits the discussion or negotiation of compensation, including salaries and benefit, during an executive session convened under ORS 192.660(2)(a), (b) or (i).

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

or any other means reasonably calculated to provide actual notice to interested persons known to the governing body.

G. OAR 199-050-0040(2)(c) provides that a governing body satisfies the media notice requirement by providing notice to those media representatives who have requested notice, either in the method requested by the media representatives or by any other means reasonably calculated to provide actual notice to the media representatives.

H. OAR 199-050-0040(3) requires public meeting notices to include the following information:

1. The time, date, location of the meeting, and, to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means.
2. The agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting.
3. The name, telephone number, and email address of a person at the public body to contact to request an interpreter or other communication aids. As an alternative, the notice may indicate that the governing body will provide a sign language interpreter or other communication aids at the meeting.
4. Executive Session Notice.

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

J. OAR 199-050-0040(4)(b) provides that the public notice for a special meeting must be “at least 24 hours advance notice.”

K. OAR 199-050-0070(3) states that “[t]he public body shall accept grievances that are filed through in-person delivery during regular business hours, by first-class mail, and by email. In addition, the public body may accept grievances by any other means it deems appropriate. A public body shall post on its website the person and contact information to whom a grievance may be submitted and the regular business hours during which in-person grievances will be accepted. In the absence of a designated person, a grievance may be submitted to the public body’s chief administrative officer or to the chair of the governing body. If the public body does not maintain a publicly accessible website, the public body shall provide notice of the person and contact information to whom a grievance may be submitted and the regular business hours during which in-person grievances will be accepted in the same manner that it provides notice of its public meetings.”

4. Stipulated Facts:

A. The OWWSA Board convened public meetings on December 10, 2024, and July 1st, July 8th and July 29th, 2025.

B. At the December 10th regular meeting, the OWWSA Board consisted of the following elected Members: Richard Lopez, James Dunkin, Ross Scocca, Mary Scrocca and Michael Papin.

C. At the December 10th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(1), ORS 192.670(3)(a), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a) and (c), OAR 199-050-0040(4)(a), and OAR 199-050-0070(3).

D. At the July 1st special meeting, July 8th regular meeting and July 29th special meeting, the OWWSA Board consisted of the following elected Members: Richard Lopez, Aiden Humphrey, Michael Papin, Mitch Logan, Bob Wolverton, Tony Sneath and Dan Parks.

E. At the July 1st meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(3), ORS 192.660(2), ORS 192.670(3)(a), OAR 199-040-0020(3), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a), (c) and (d), OAR 199-050-0040(4)(b), and OAR 199-050-0070(3).

F. At the July 8th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(1), ORS 192.670(3)(a), OAR 199-050-0040(3)(a)-(d), and OAR 199-050-0070.

G. At the July 29th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(3), ORS 192.670(3)(a), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a) and (c), OAR 199-050-0040(4)(b) and OAR 199-050-0070(3).

5. Conclusion/Violation

A. Bob Wolverton was serving as a Member at one or more each of the OWWSA Board meetings. As an OWWSA Board member, Bob Wolverton was responsible for adherence to Public Meetings Law.

B. Bob Wolverton violated one or more of the provisions found in ORS 192.640, ORS 192.660(2), ORS 192.670, OAR 199-040-0020, OAR 199-050-0040,

and OAR 199-040-0070 as described in paragraphs 4(C), (D), (E), (F) and (G).

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

6. Terms of Settlement:

The parties agree as follows:

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

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

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

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

7. Review by Counsel:

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

8. Effect:

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

By signing this agreement, Bob Wolverton agrees to waive their 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, Bob Wolverton agrees to waive their 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:
Bob Wolverton
37A85E975B234EB...

September 17, 2026

Respondent: Bob Wolverton — Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of: **James Dunkin** Case No.: **25-694PCF**	**STIPULATED FINAL ORDER**

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1. Purpose:

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

2. Jurisdiction:

A. James Dunkin is a Member of the Ochoco West Water and Sanitation Authority (OWWSA) Board of Directors (Board). As such, they are a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Public Meetings Ethics Law found in ORS Chapter 192.

B. On December 12, 2025, the Commission considered information in the preliminary review phase of Case No. 25-694PCF and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 244.020(10)(a) defines “legislative or administrative interest” to include an economic interest, distinct from that of the general public, in any matter subject to the decision or vote of the public official acting in the public official’s capacity as a public official. ORS 192.640(1) explains that “[t]he governing body of a public body shall provide for and give public notice, reasonably calculated to give actual notice to

interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

B. ORS 192.640(3) states that "[n]o special meeting shall be held without at least 24 hours' notice to the members of the governing body, the news media which have requested notice and the general public. In case of an actual emergency, a meeting may be held upon such notice as is appropriate to the circumstances, but the minutes for such a meeting shall describe the emergency justifying less than 24 hours' notice."

C. ORS 192.660(2)(a) allows the governing body of a public body to hold an executive session "[t]o consider the employment of a public officer, employee, staff member or individual agent."

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

E. OAR 199-040-0020(3) prohibits the discussion or negotiation of compensation, including salaries and benefit, during an executive session convened under ORS 192.660(2)(a), (b) or (i).

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

or any other means reasonably calculated to provide actual notice to interested persons known to the governing body.

G. OAR 199-050-0040(2)(c) provides that a governing body satisfies the media notice requirement by providing notice to those media representatives who have requested notice, either in the method requested by the media representatives or by any other means reasonably calculated to provide actual notice to the media representatives.

H. OAR 199-050-0040(3) requires public meeting notices to include the following information:

1. The time, date, location of the meeting, and, to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means.
2. The agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting.
3. The name, telephone number, and email address of a person at the public body to contact to request an interpreter or other communication aids. As an alternative, the notice may indicate that the governing body will provide a sign language interpreter or other communication aids at the meeting.
4. Executive Session Notice.

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

J. OAR 199-050-0040(4)(b) provides that the public notice for a special meeting must be “at least 24 hours advance notice.”

K. OAR 199-050-0070(3) states that “[t]he public body shall accept grievances that are filed through in-person delivery during regular business hours, by first-class mail, and by email. In addition, the public body may accept grievances by any other means it deems appropriate. A public body shall post on its website the person and contact information to whom a grievance may be submitted and the regular business hours during which in-person grievances will be accepted. In the absence of a designated person, a grievance may be submitted to the public body’s chief administrative officer or to the chair of the governing body. If the public body does not maintain a publicly accessible website, the public body shall provide notice of the person and contact information to whom a grievance may be submitted and the regular business hours during which in-person grievances will be accepted in the same manner that it provides notice of its public meetings.”

4. Stipulated Facts:

A. The OWWSA Board convened public meetings on December 10, 2024, and July 1st, July 8th and July 29th, 2025.

B. At the December 10th regular meeting, the OWWSA Board consisted of the following elected Members: Richard Lopez, James Dunkin, Ross Scocca, Mary Scrocca and Michael Papin.

C. At the December 10th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(1), ORS 192.670(3)(a), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a) and (c), OAR 199-050-0040(4)(a), and OAR 199-050-0070(3).

D. At the July 1st special meeting, July 8th regular meeting and July 29th special meeting, the OWWSA Board consisted of the following elected Members: Richard Lopez, Aiden Humphrey, Michael Papin, Mitch Logan, Bob Wolverton, Tony Sneath and Dan Parks.

E. At the July 1st meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(3), ORS 192.660(2), ORS 192.670(3)(a), OAR 199-040-0020(3), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a), (c) and (d), OAR 199-050-0040(4)(b), and OAR 199-050-0070(3).

F. At the July 8th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(1), ORS 192.670(3)(a), OAR 199-050-0040(3)(a)-(d), and OAR 199-050-0070.

G. At the July 29th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(3), ORS 192.670(3)(a), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a) and (c), OAR 199-050-0040(4)(b) and OAR 199-050-0070(3).

5. Conclusion/Violation

A. James Dunkin was serving as a Member at one or more each of the OWWSA Board meetings. As an OWWSA Board member, James Dunkin was responsible for adherence to Public Meetings Law.

B. James Dunkin violated one or more of the provisions found in ORS 192.640, ORS 192.660(2), ORS 192.670, OAR 199-040-0020, OAR 199-050-0040,

and OAR 199-040-0070 as described in paragraphs 4(C), (D), (E), (F) and (G).

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

6. Terms of Settlement:

The parties agree as follows:

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

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

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

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

7. Review by Counsel:

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

8. Effect:

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

By signing this agreement, James Dunkin agrees to waive their 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, James Dunkin agrees to waive their 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:
James Dunkin
EA5F2E61703S4DE...

Respondent: James Dunkin

September 17, 2026
Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of: **Ross Scrocca** Case No.: **25-695PCF**	**STIPULATED FINAL ORDER**

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1. Purpose:

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

2. Jurisdiction:

A. Ross Scrocca is a Member of the Ochoco West Water and Sanitation Authority (OWWSA) Board of Directors (Board). As such, they are a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Public Meetings Ethics Law found in ORS Chapter 192.

B. On December 12, 2025, the Commission considered information in the preliminary review phase of Case No. 25-695PCF and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 244.020(10)(a) defines “legislative or administrative interest” to include an economic interest, distinct from that of the general public, in any matter subject to the decision or vote of the public official acting in the public official’s capacity as a public official. ORS 192.640(1) explains that “[t]he governing body of a public body shall provide for and give public notice, reasonably calculated to give actual notice to

interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

B. ORS 192.640(3) states that "[n]o special meeting shall be held without at least 24 hours' notice to the members of the governing body, the news media which have requested notice and the general public. In case of an actual emergency, a meeting may be held upon such notice as is appropriate to the circumstances, but the minutes for such a meeting shall describe the emergency justifying less than 24 hours' notice."

C. ORS 192.660(2)(a) allows the governing body of a public body to hold an executive session "[t]o consider the employment of a public officer, employee, staff member or individual agent."

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

E. OAR 199-040-0020(3) prohibits the discussion or negotiation of compensation, including salaries and benefit, during an executive session convened under ORS 192.660(2)(a), (b) or (i).

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

or any other means reasonably calculated to provide actual notice to interested persons known to the governing body.

G. OAR 199-050-0040(2)(c) provides that a governing body satisfies the media notice requirement by providing notice to those media representatives who have requested notice, either in the method requested by the media representatives or by any other means reasonably calculated to provide actual notice to the media representatives.

H. OAR 199-050-0040(3) requires public meeting notices to include the following information:
    1. The time, date, location of the meeting, and, to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means.
    2. The agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting.
    3. The name, telephone number, and email address of a person at the public body to contact to request an interpreter or other communication aids. As an alternative, the notice may indicate that the governing body will provide a sign language interpreter or other communication aids at the meeting.
    4. Executive Session Notice.

I. OAR 199-050-0040(4)(a) clarifies that the timing of regular meeting

notice be “as much advance notice as reasonably possible, but no less than 48 hours advance notice. ”

J. OAR 199-050-0040(4)(b) provides that the public notice for a special meeting must be “at least 24 hours advance notice.”

K. OAR 199-050-0070(3) states that “[t]he public body shall accept grievances that are filed through in-person delivery during regular business hours, by first-class mail, and by email. In addition, the public body may accept grievances by any other means it deems appropriate. A public body shall post on its website the person and contact information to whom a grievance may be submitted and the regular business hours during which in-person grievances will be accepted. In the absence of a designated person, a grievance may be submitted to the public body’s chief administrative officer or to the chair of the governing body. If the public body does not maintain a publicly accessible website, the public body shall provide notice of the person and contact information to whom a grievance may be submitted and the regular business hours during which in-person grievances will be accepted in the same manner that it provides notice of its public meetings.”

4. Stipulated Facts:

A. The OWWSA Board convened public meetings on December 10, 2024, and July 1st, July 8th and July 29th, 2025.

B. At the December 10th regular meeting, the OWWSA Board consisted of the following elected Members: Richard Lopez, James Dunkin, Ross Scocca, Mary Scrocca and Michael Papin.

C. At the December 10th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS

192.640(1), ORS 192.670(3)(a), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a) and (c), OAR 199-050-0040(4)(a), and OAR 199-050-0070(3).

D. At the July 1st special meeting, July 8th regular meeting and July 29th special meeting, the OWWSA Board consisted of the following elected Members: Richard Lopez, Aiden Humphrey, Michael Papin, Mitch Logan, Bob Wolverton, Tony Sneath and Dan Parks.

E. At the July 1st meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(3), ORS 192.660(2), ORS 192.670(3)(a), OAR 199-040-0020(3), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a), (c) and (d), OAR 199-050-0040(4)(b), and OAR 199-050-0070(3).

F. At the July 8th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(1), ORS 192.670(3)(a), OAR 199-050-0040(3)(a)-(d), and OAR 199-050-0070.

G. At the July 29th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(3), ORS 192.670(3)(a), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a) and (c), OAR 199-050-0040(4)(b) and OAR 199-050-0070(3).

5. Conclusion/Violation

A. Ross Scrocca was serving as a Member at the December 10, 2025, OWWSA Board meeting. As an OWWSA Board member, Ross Scrocca was responsible for adherence to Public Meetings Law.

B. Ross Scrocca violated one or more of the provisions found in ORS 192.640, ORS 192.660(2), ORS 192.670, OAR 199-040-0020, OAR 199-050-0040, and OAR 199-040-0070 as described in paragraphs 4(C), (D), (E), (F) and (G).

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

6. Terms of Settlement:

The parties agree as follows:

A. Ross Scrocca has indicated that they wish to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigation phase.

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

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

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

7. Review by Counsel:

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

8. Effect:

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

By signing this agreement, Ross Scrocca agrees to waive their 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, Ross Scrocca agrees to waive their 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:
06943F2EC0C3434...

September 29, 2026

Respondent: Ross Scrocca Date

Shenoa Payne, Chairperson Date
Oregon Government Ethics Commission

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of: **Mary Scrocca** Case No.: **25-696PCF**	**STIPULATED FINAL ORDER**

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1. Purpose:

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

2. Jurisdiction:

A. Mary Scrocca is a Member of the Ochoco West Water and Sanitation Authority (OWWSA) Board of Directors (Board). As such, they are a public official, as defined in ORS 244.020(15), and therefore subject to Oregon Public Meetings Ethics Law found in ORS Chapter 192.

B. On December 12, 2025, the Commission considered information in the preliminary review phase of Case No. 25-696PCF and acted to find cause to open an investigation of this matter.

3. Applicable Law:

A. ORS 244.020(10)(a) defines “legislative or administrative interest” to include an economic interest, distinct from that of the general public, in any matter subject to the decision or vote of the public official acting in the public official’s capacity as a public official. ORS 192.640(1) explains that “[t]he governing body of a public body shall provide for and give public notice, reasonably calculated to give actual notice to

interested persons including news media which have requested notice, of the time and place for holding regular meetings. The notice shall also include a list of the principal subjects anticipated to be considered at the meeting, but this requirement shall not limit the ability of a governing body to consider additional subjects."

B. ORS 192.640(3) states that "[n]o special meeting shall be held without at least 24 hours' notice to the members of the governing body, the news media which have requested notice and the general public. In case of an actual emergency, a meeting may be held upon such notice as is appropriate to the circumstances, but the minutes for such a meeting shall describe the emergency justifying less than 24 hours' notice."

C. ORS 192.660(2)(a) allows the governing body of a public body to hold an executive session "[t]o consider the employment of a public officer, employee, staff member or individual agent."

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

E. OAR 199-040-0020(3) prohibits the discussion or negotiation of compensation, including salaries and benefit, during an executive session convened under ORS 192.660(2)(a), (b) or (i).

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

or any other means reasonably calculated to provide actual notice to interested persons known to the governing body.

G. OAR 199-050-0040(2)(c) provides that a governing body satisfies the media notice requirement by providing notice to those media representatives who have requested notice, either in the method requested by the media representatives or by any other means reasonably calculated to provide actual notice to the media representatives.

H. OAR 199-050-0040(3) requires public meeting notices to include the following information:
    1. The time, date, location of the meeting, and, to the extent reasonably possible, the electronic link or telephone access information to allow members of the public to attend the meeting by telephone or electronic means.
    2. The agenda or list of the principal subjects anticipated to be considered at the meeting. The agenda or list of principal subjects shall be specific enough to permit members of the public to recognize the matters in which they are interested. The governing body may amend the agenda or may add or remove items from the list of principal subjects prior to or during a meeting.
    3. The name, telephone number, and email address of a person at the public body to contact to request an interpreter or other communication aids. As an alternative, the notice may indicate that the governing body will provide a sign language interpreter or other communication aids at the meeting.
    4. Executive Session Notice.

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

J. OAR 199-050-0040(4)(b) provides that the public notice for a special meeting must be “at least 24 hours advance notice.”

K. OAR 199-050-0070(3) states that “[t]he public body shall accept grievances that are filed through in-person delivery during regular business hours, by first-class mail, and by email. In addition, the public body may accept grievances by any other means it deems appropriate. A public body shall post on its website the person and contact information to whom a grievance may be submitted and the regular business hours during which in-person grievances will be accepted. In the absence of a designated person, a grievance may be submitted to the public body’s chief administrative officer or to the chair of the governing body. If the public body does not maintain a publicly accessible website, the public body shall provide notice of the person and contact information to whom a grievance may be submitted and the regular business hours during which in-person grievances will be accepted in the same manner that it provides notice of its public meetings.”

4. Stipulated Facts:

A. The OWWSA Board convened public meetings on December 10, 2024, and July 1st, July 8th and July 29th, 2025.

B. At the December 10th regular meeting, the OWWSA Board consisted of the following elected Members: Richard Lopez, James Dunkin, Ross Scocca, Mary Scrocca and Michael Papin.

C. At the December 10th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(1), ORS 192.670(3)(a), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a) and (c), OAR 199-050-0040(4)(a), and OAR 199-050-0070(3).

D. At the July 1st special meeting, July 8th regular meeting and July 29th special meeting, the OWWSA Board consisted of the following elected Members: Richard Lopez, Aiden Humphrey, Michael Papin, Mitch Logan, Bob Wolverton, Tony Sneath and Dan Parks.

E. At the July 1st meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(3), ORS 192.660(2), ORS 192.670(3)(a), OAR 199-040-0020(3), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a), (c) and (d), OAR 199-050-0040(4)(b), and OAR 199-050-0070(3).

F. At the July 8th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(1), ORS 192.670(3)(a), OAR 199-050-0040(3)(a)-(d), and OAR 199-050-0070.

G. At the July 29th meeting, the OWWSA Board failed to satisfy the requirements set forth in the following statutes and administrative rules: ORS 192.640(3), ORS 192.670(3)(a), OAR 199-050-0040(2)(b) and (c), OAR 199-050-0040(3)(a) and (c), OAR 199-050-0040(4)(b) and OAR 199-050-0070(3).

H. Mary Scrocca asserts that she did not willfully or intentionally violate provisions in Public Meetings Law. She further contends that the posting of meeting materials was done by OWWSA staff and due to financial constraints, they did not have the ability to provide remote/electronic access to their public meetings. Ms. Scrocca also asserts that Board's actions were under the advice of OWWSA's legal counsel. Notwithstanding these assertions, Ms. Scrocca agrees to the terms and conditions of this Stipulated Final Order to resolve the matter and bring this case to a close.

5. Conclusion/Violation

A. Mary Scrocca was serving as a Member at the December 10, 2025, OWWSA Board meeting. As an OWWSA Board member, Mary Scrocca was responsible for adherence to Public Meetings Law.

B. Mary Scrocca violated one or more of the provisions found in ORS 192.640, ORS 192.660(2), ORS 192.670, OAR 199-040-0020, OAR 199-050-0040, and OAR 199-040-0070 as described in paragraphs 4(C), (D), (E), (F) and (G).

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

6. Terms of Settlement:

The parties agree as follows:

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

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

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

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

7. Review by Counsel:

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

8. Effect:

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

By signing this agreement, Mary Scrocca agrees to waive their 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, Mary Scrocca agrees to waive their 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:
FFFAE70B6F75401...

Respondent: Mary Scrocca

September 24, 2026
Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission

Date

BEFORE THE OREGON

GOVERNMENT ETHICS COMMISSION

In the Matter of: **Tammy Dennee** Case No.: **26-453LJS** Date: **October 9, 2026**	**STIPULATED FINAL ORDER**

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1. Purpose:

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

2. Jurisdiction:

At all material times, Tammy Dennee was a lobbyist for Rogue Botanicals. As such, Tammy Dennee is subject to the jurisdiction of the Commission pursuant to ORS Chapter 171.

3. Applicable Law:

A. ORS 171.740(1) provides that "* * * within three business days after agreeing to provide personal services for money or any other consideration for the purpose of lobbying, a lobbyist shall register with the Oregon Government Ethics Commission * * *." Such registration is completed through the Commission's Electronic Filing System (EFS).

B. ORS 171.740(5) provides that a lobbyist registration expires December 31, of each odd-numbered year. If a lobbyist renews the registration before January

31 of the following even-numbered year, the Commission shall consider the registration to have been effective as of December 31 of the odd-numbered year on which the registration expired.

C. ORS 171.740(2)(a) provides that "[n]ot later than 10 calendar days after a lobbyist files a registration statement under this section, the designation of official authorization to lobby shall be signed by an official of each person that employs the lobbyist or in whose interest the lobbyist appears or works." The client/employer's official authorization is done through EFS.

4. Stipulated Facts:

A. Tammy Dennee has been registered as a lobbyist in EFS since 2016, and has lobbied on behalf of a number of clients.

B. Tammy Dennee registered in EFS as a lobbyist for "Rogue Botannicals" [sic] on June 8, 2026; however, "Rogue Botannicals" [sic] was not a registered client/employer in EFS, and as such, Tammy Dennee's lobbyist registration was not accepted. On July 1, 2026, Tammy Dennee registered as a lobbyist for Rogue Botanicals, and her registration was accepted on the same day. Because Tammy Dennee incorrectly entered her client/employer's name and contact information when she initiated her lobbyist registration on June 8, 2026, she was not registered as a lobbyist for Rogue Botanicals from June 8, 2026 until July 1, 2026.

C. On July 1, 2026, Tammy Dennee filed a self-reported complaint. The complaint states that Rogue Botanicals initiated a retainer with Tammy Dennee during Q2 of 2026; however, Tammy Dennee failed to register as a lobbyist for Rogue Botanicals in EFS during Q2 2026.

D. Tammy Dennee submitted a timely-filed quarterly expenditure report for Q2 2026 on July 1, 2026. However, Rogue Botanicals could not and did not file their Q2 2026 client quarterly expenditure report, as Tammy Dennee's registration to lobby on their behalf was not active.

E. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to find one violation of ORS 171.740(1).

5. Terms of Settlement:

The parties agree as follows:

A. On July 2, 2026, Tammy Dennee filed a self-reported complaint, initiating a case in preliminary review. Tammy Dennee has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the preliminary review phase.

B. ORS 171.992(1) authorizes the Commission to assess civil penalties of up to $5,000.00 for each violation of ORS 171.740. In lieu of civil penalty, Tammy Dennee will receive a letter of education, as authorized by ORS 171.992(4).

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

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

6. Review by Counsel:

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

7. Effect:

This agreement is subject to the final approval of the Commission. Once

approved, this agreement shall be the final disposition of these matters and shall be binding upon all parties.

By signing this agreement, Tammy Dennee agrees to waive her right to a contested case hearing as provided in ORS Chapter 183 and ORS 171.778. 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, Tammy Dennee 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:
E82251826E25456...

September 8, 2026

Respondent: Tammy Dennee — Date

Shenoa Payne, Chairperson
Oregon Government Ethics Commission — Date

Oregon
Tina Kotek, Governor

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

September 2, 2026

Sent via email

Executive Director Jin Lan
Oregon-China Sister State Committee
900 Court St. NE
Salem, OR 97301-4096

Re: Advice No. 26-608I

Dear Jin Lan:

This letter of advice is provided in response to your request which presented a question regarding application of the gift exceptions in Oregon Government Ethics Law to paid travel expenses for members of delegations invited to represent the State of Oregon during three missions to China, scheduled between September 7 and October 22, 2026, hosted by the Oregon-China Sister State Committee.

You explained that the purpose of these missions is to assess the effects of tariffs on Oregon exports to China and to examine clean-technology development, wildfire management, and educational exchanges. Delegates will participate in the opening ceremony of the China International Fair for Investment and Trade (CIFIT) in Xiamen, the China-ASEAN Expo (CAEXPO) at the Guangxi International Convention and Exhibition Center, and the 2026 Legislators Forum for Friendly Exchanges in Tianjin, as well as other high-level meetings in China.

You indicate that the members of the Oregon delegation will include state legislators, county commissioners, and representatives of the Oregon-China Council. The delegations will include:

- September 7 to 19: Delegation led by retired Senator Michael Dembrow and including 10 county commissioners.

- September 15 to 29: Delegation led by Senate President Pro Tempore James Manning.
- October 9 to 22: Delegation led by Speaker Pro Tempore David Gomberg.

Local Chinese hosts, including the local governments for Fujian, Tianjin, and Guangxi and the Chinese People's Association for Friendship with Foreign Countries, will cover lodging, meals, local transportation, and admission to cultural sites. Legislators and county commissioners will pay for their own international airfare and visa fees, with the exception of Representative David Gomberg, whose airfare will be covered by a conference organizer.

You have asked whether any of the gift exceptions in ORS Chapter 244 would apply to permit the legislators and other public officials to accept the paid travel expenses for participation in these delegations to China.

Under most circumstances when a public official is offered something of value, including but not limited to travel expenses, such as food, beverage, admission, lodging and transportation expenses, at no cost to the public official, it would be a gift as defined in ORS 244.020(7)(a) and subject to the gift restrictions in ORS 244.025(1). There are, however, a number of gift exceptions in ORS 244.020(7)(b) that may apply to permit a public official to accept such paid expenses. In particular, ORS 244.020(7)(b)(E) and ORS 244.020(7)(b)(H) could apply to the scenario you describe.

First, ORS 244.020(7)(b)(E) allows a public official to accept "[a]dmission provided to or the cost of food or beverage consumed by a public official, [their relative, household member or staff member accompanying them] at a reception, meal or meeting held by an organization when the public official represents" state government, a local government, or a special government body. This gift exception could apply to the scenario you describe. You mention that the Local Chinese Hosts will be paying for entrance fees and providing some meals. To determine if the gift exception applies, the public officials will need to consider whether the entrance fees and meals are

associated with organized, planned and publicized events that involve a large number of invitees, have advance invitations, written programs or materials, and that may be open to the public. [OAR 199-005-0015]. If so, then the public officials could accept the paid expenses for these events under the gift exception in ORS 244.020(7)(b)(E).

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

For such paid expenses to qualify for this gift exception, the following three criteria must be met. First, the public official must be representing state government, a local government or a special government body. In this situation, the legislators would be representing the State of Oregon and the County Commissioners would be representing their local governments.

Second, the purpose of the activity or trip must be for trade-promotion or a fact-finding mission, or for negotiations or economic development activities, where receipt of expenses is approved in advance. A “fact finding mission or trip” is “any activity related to a cultural or educational purpose, or any activity aimed at providing intergovernmental assistance, such as for the purpose of international aid or sharing best practices, or developing intergovernmental relationships directly related to the public official’s duties. The sponsor of a fact-finding mission should be directly and immediately associated with the event, or the location being visited.” [OAR 199-005-0001(2)]. “Trade promotion” means “an activity for the purpose of encouraging or developing commerce or the buying and selling of goods and services.” [OAR 199-005-0020(3)(c)]. “Economic Development Activities” are “activities undertaken for the

purpose of strengthening, expanding, or enhancing the economy, or activities that provide community development or cultural enhancement." [OAR 199-005-0020(3)(d)].

Based on the information provided, the 2026 missions to China would likely qualify as fact-finding missions, as they appear to have an educational purpose and to be aimed at advancing intergovernmental relationships with a delegation representing the State of Oregon. They may also fall into the categories of trade promotion or economic development activities. Thus, the three missions would appear to satisfy the second prong of the ORS 244.020(7)(b)(H) analysis.

Third, the activities must be "officially sanctioned or officially designated," which requires written approval by a state or local public body or by a person authorized by the public body to provide that approval. When the activity is officially designated as negotiations or economic activity, the written notice will include approval for the public official to accept the payment of reasonable expenses. [OAR 199-005-0020(3)(b)]. The Administrative Rule goes on to clarify that for members of the legislative assembly, the written approval must be provided by the President of the Senate, Speaker of the House, the designated majority or minority leaders of either chamber or appointed committees of the Legislative Assembly, unless the public body determines otherwise. [OAR 199-005-0020(3)(b)(C)]. In this situation, the legislators would need to follow the procedure(s) required by their leadership in the Legislative Assembly to ensure the activities are officially sanctioned or designated. For the county commissioners, they will need to have the counties' governing bodies (i.e., the County Board of Commissioners) make the official sanction or designation. [OAR 199-005-0020(3)(b)(B)].

Finally, as public officials required to file Annual Verified Statements of Economic Interest (SEI), the legislators and county commissioners will be required to report the aggregate value of these paid expenses on their 2027 SEIs. ORS 244.060(6) requires public officials to identify all expenses with an aggregate value exceeding $50 when participating in an event described in ORS 244.020(7)(b)(H). Per this requirement, the

entities or organizations who are the source of the paid expenses should provide the delegates with a written statement of the expenses they provided within 10 days after the date the expenses are incurred. [OAR 199-005-0020(2)(c)].

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

Sincerely,

Susan V. Myers

Susan V. Myers,

Executive Director

*****DISCLAIMER*****

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

Oregon
Tina Kotek, Governor

Government Ethics Commission
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Website: www.oregon.gov/ogec

September 9, 2026

Sent via email

Kimberly A. Stuart
Washington County Sheriff's Office
155 N. First Avenue, Suite 250, MS 24
Hillsboro, OR 97124-3072

Re: Advice No. 26-623I

Dear Kimberly Stuart,

This letter of advice is provided in response to your request received on April 6, 2026. The following analysis and advice is offered under the authority provided in ORS 244.284 as guidance on how the current provisions of Oregon Government Ethics Law may apply to the specific circumstances you have presented.

Information Presented

The information provided indicates that a Washington County law enforcement agency would like to have agency staff solicit items for the agency, either by generally approaching the public or sending out flyers. You explain that a staff appreciation committee made up of agency staff would solicit items such as gift cards, product donations, event supplies, or money from community members. Some of the donated items may come from sources that have contracts with the agency or the local government. Some of the individuals or businesses donating items may have a legislative or administrative interest in the local government, some may not, and sometimes the donors may be anonymous. Agency staff may make personal donations and can request reimbursement from the agency.

The donations would be used for staff at agency events. You explain that money or gift cards would be used to purchase food for events, and other donated items would be given

directly to law enforcement staff or their families. The agency would like to use the donated items for raffles at various agency events, which are not open to the general public. At the events, the raffle tickets are given freely on entry to staff, their family, and their friends. You also state that donated items could also be used for a local government-funded employee wellness program, sponsored through the human resources department. The items would be used as prizes, given directly to agency staff for participating in various wellness events. You indicate that the raffle prizes and gift cards are often worth more than $50.

Finally, you state that the agency is considering whether to have a nonprofit 501(c)(3) charitable foundation (Foundation) accept money and donations on its behalf, to then be passed along to the agency as a grant from the Foundation.

In light of all this information, you ask the following questions:

1) Does the solicitation for donations by agency staff, to be given to agency employees, their friends, and their families, violate Oregon Government Ethics Law?
    a) Does the analysis change if agency staff are soliciting donations during their time off?
    b) Does the analysis change if the employees are not given any item from an individual donor worth more than $50.
2) Can the donated items be given to agency employees, their friends, and their families through a raffle process?
    a) Does the analysis change if the raffle is open to the general public?
    b) Can employees raise money internally to pay for events?
    c) Does the analysis change if the local government has a policy that food and beverages provided at these events are part of the employees' official compensation packages?
3) Are donations and money given to the agency, to be provided to employees, friends and family members, subject to the same restrictions?

a) Does the analysis change if the items are donated to the local government's HR wellness program?

4) Are donations made to the Foundation subject to Oregon Government Ethics Law?

a) If not, are there restrictions prohibiting the Foundation from providing the donated items to agency employees?

b) Would the Foundation or other nonprofit organization be prohibited from sponsoring an appreciation event for agency staff where food or meals are provided to them and their families?

Analysis:

Initially, the information presented and questions asked require us to clarify a couple of points.

First, there is a difference in how solicitations/donations are treated when they are donations to the agency or public body versus donations or gifts to individual public officials. The ethics laws in ORS Chapter 244 apply to individual public officials, not to public bodies. OGEC has no authority over how another public body, such as the Washington County Sheriff's Office, administers its programs or resources. Rather, OGEC's jurisdiction is limited to examining how the laws in ORS Chapter 244 apply to decisions or actions taken by individual public officials. Thus, we cannot advise on whether the Sheriff's Office can direct its employees to engage in soliciting donations to the Sheriff's Office or whether or how the Sheriff's Office itself can solicit and use such donations.

Second, there is a difference in how donations or gifts received by a public official, or their relatives or household members, are treated in the ethics laws in ORS Chapter 244. When something of value is provided to a public official by their public body, it is analyzed under the use of office statute, ORS 244.040. When something of value is provided to a public

official by an individual or entity other than their public body, it is analyzed under the gift clause, ORS 244.025.

Statutes and Rules

The prohibited use of office statute, ORS 244.040(1), provides that a public official may not use or attempt to use their office or position to obtain a financial benefit or avoid a financial detriment, for themselves, their relatives or household members, or any businesses with which any of them are associated, if the financial gain/avoidance of detriment would not otherwise be available to them but for their holding their public office or position.

ORS 244.040(2)(a) provides an exception allowing a public official to accept any part of an official compensation package, as defined in OAR 199-008-0005(3). The 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.

ORS 244.040(2)(c) provides another exception, allowing a public official to accept reimbursement of expenses from their public body. As defined in OAR 199-008-0005(4), the term reimbursement of expenses means the payment by a public body to a public official of expenses incurred in the conduct of their official duties on behalf of the public body. Such repayment must comply with applicable laws and policies.

ORS 244.020(7)(a) defines a gift as something of economic value for which equivalent consideration is not charged, or which is offered at a discount, and that is not offered to others, who are not public officials, on the same terms and conditions.

The gift clause in ORS 244.025(1) prohibits public officials, and their relatives or household members, from soliciting or accepting gifts in excess of $50 in a calendar year from a source

that could reasonably be known to have a legislative or administrative interest in the public official's decisions or votes. ORS 244.020(10) defines a "legislative or administrative interest" as an economic interest, distinct from that of the general public, in any matter subject to the decision or vote of the public official acting in their official capacity. Thus, if the public official holds a position where they could make a decision or vote to take an action that would have a distinct economic impact on the source of a gift, then that source would have a legislative or administrative interest. And if the value of the gift being offered, combined with the value of any other gifts received from the same source during the calendar year, exceeds $50, then the public official would be prohibited from accepting the gift.

Questions/Answers

Some of the scenarios posed and questions asked fall outside of ORS Chapter 244. As noted above, the ethics laws apply to individual public officials, not to public bodies. The ethics laws do not apply to gifts or donations given to the public body itself, whether they come from individuals, businesses, or even a 501(c)(3) foundation created by the public body. Please note that OGEC cannot advise whether the Sheriff's Office could create such a non-profit foundation.

If the Sheriff's Office directs its employees, during office hours or otherwise, to solicit donations to the Sheriff's Office, that would not fall within ORS Chapter 244. However, if the employees solicit donations not to the Sheriff's Office but directly to themselves, that would be subject to ORS Chapter 244. In that scenario, the donations would be evaluated as gifts, per the definition in ORS 244.020(7)(a) and would be subject to the gift clause in ORS 244.025. That means the employees could not accept any gift or donation if the value was in excess of $50 aggregate in the calendar year and the source of the gift or donation was a person or entity that would have a legislative or administrative interest in the decisions or votes of the employee or official.

Another one of the scenarios posed in your request indicated that staff could make personal donations and request reimbursement from the agency. This scenario is a bit more difficult to assess, partly because the funds the Sheriff's Office would be reimbursing to the employees in exchange for their personal donations would not appear to qualify for the reimbursement of expenses exception in ORS 244.040(2)(c). Thus, before the employees could accept such "reimbursements" from the Sheriff's Office, they would need to determine whether the payment of these funds fell within their official compensation packages. For example, does the Sheriff's Office have a written, formally adopted policy authorizing employees to be paid equivalent sums for their donations to these programs or events? If so, then the payments could be authorized under the exception in ORS 244.040(2)(a). But if there were no policy in place, then the receipt of these funds would be examined under the prohibited use of office statute in ORS 244.040(1).

Most of the scenarios posed would have the Sheriff's Office itself using the donations to purchase food for employee events, or to provide items directly to employees or their families, or to offer donated items as raffle prizes at Sheriff's Office events, or as prizes in wellness programs offered by the Sheriff's Office.

Before we get to the analysis, we do want to clarify two additional points. In your scenarios you mentioned that the donations could be given to employees or their families or friends. We just want to clarify that many of the ethics laws in ORS Chapter 244 apply to financial benefits provided to a public official's relatives or household members. They do not apply to benefits provided to a public official's "friends." Additionally, we want to clarify that the laws in ORS Chapter 244 would apply to financial benefits provided to relatives, as defined in ORS 244.020(16), which may be a narrower definition than what is meant by the broader "families."

So the scenario is that the donations are made to the Sheriff's Office, who then decides to use those donations to purchase food for employee events, pay for decorations, offer donated items to employees, or use the donated items as prizes in raffles or wellness

programs. Employees could accept the food provided by the Sheriff's Office under the new exception in ORS 244.040(2)(j), which allows public officials to accept food and beverages provided by a public body at an official event. As for accepting donated items from the Sheriff's Office, or accepting donated items provided as prizes in a raffle or for participation in a wellness program, that would be analyzed under the prohibited use of office statute, ORS 244.040(1) and the official compensation package exception in OAR 199-008-0005(3).

When an employee receives one of the donated items from the Sheriff's Office, they would need to make a determination of whether the items fall within their official compensation package. They would do so if the provision of the items is addressed in a written policy or in their employment agreements or union contracts. For example, if the Human Resources Department has a policy in place saying that employees can accept wellness benefits provided by the Sheriff's Office or its contracted insurers, then the employees could accept those benefits without being in violation of ORS 244.040(2)(a). Similarly, if the Sheriff's Office has a written policy providing that the Office can use donated items as raffle prizes and that employees can accept those prizes, then that policy would make the receipt of such prizes part of the employees' official compensation packages. However, if the provision of these additional benefits to employees is not addressed in any Sheriff's Office policies, employment agreements or union contracts, then the receipt of such items would be analyzed as a use of office.

That analysis would look at whether the employees were using or attempting to use their positions to obtain a financial gain or avoid a financial detriment that would not otherwise be available to them but for their holding their official positions. So if employees were to receive gift cards or other items from the Sheriff's Office as prizes in a raffle, they would need to consider whether this financial benefit would be available to them if they weren't Sheriff's Office employees. Absent such benefits being part of their official compensation packages, the receipt of such items could constitute a violation of ORS 244.040(1).

If you have any additional questions regarding this advice or the application of Oregon Government Ethics Law, please feel free to contact me directly.

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

SVM/JJS

*****DISCLAIMER*****

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

Oregon
Tina Kotek, Governor

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September 24, 2026

Sent via email

Kevin Barton
Washington County District Attorney
150 North First Ave MS 40
Hillsboro, OR 97124

Re: Advice No. 26-590I

Dear Mr. Barton:

This letter of advice is provided in response to your request received on August 26, 2026, for guidance as to the application of Oregon Government Ethics law in ORS Chapter 244 with regard to the acceptance of paid travel expenses.

You have been invited to be a speaker at the Axon Accelerate 2027 conference (2027 Axon Conference) hosted by Axon, a company that provides equipment and technology to law enforcement agencies throughout the country. The 2027 Axon Conference will take place in Las Vegas on April 20 to 23, 2027. Axon is offering to pay travel, meals, lodging and conference registration expenses for you to attend the event. The invitation you provided via email states that you will have a dedicated speaking slot, and your presentation will be part of their Prosecutor Track, with approximately 200–250 prosecutors and law enforcement in attendance. You will share your experience of "building a thoughtful pilot [and] creating a roadmap that other prosecutors' offices can follow." You have asked whether you can accept the offer of paid travel expenses and conference registration to attend and participate in the 2027 Axon Conference.

In most circumstances, when a public official is offered something of economic value at no cost or at a discount, and it is not offered to others, who are not public officials, on the same terms and conditions, it is considered a gift, as defined in ORS 244.020(7)(a),

and subject to the gift clause in ORS 244.025(1). There are exceptions, however, for items that do not qualify as gifts under one of the exceptions in ORS 244.020(7)(b), such as paid registration to a conference or travel, meals and lodging.

ORS 244.020(7)(b)(E) allows acceptance of admission provided to a public official at a reception, meal or meeting held by an organization when the public official represents state government. A “meeting” is defined as an event that includes multiple attendees, members of an organization or of the general public who have been invited to the event. “The purpose or agenda for the meeting would be included in any advance notice of the event.” [OAR 199-005-0001(4)].

Additionally, OGEC has adopted an Administrative Rule, OAR 199-005-0015, that lists several factors that may indicate whether paid expenses qualify under the exception in ORS 244.020(7)(b)(E). These factors include: (1) a large number of people or groups are invited; (2) invitations or programs are sent in advance; (3) the event is publicized; (4) the reception, meal or meeting is open to the public; or (5) written materials are available.

The 2027 Axon Conference would appear to qualify as a meeting, as defined in OAR 199-005-0001(4). Thus, assuming the factors in OAR 199-005-0015 are satisfied, and you are attending the conference as a representative of your government body, the gift exception in ORS 244.020(7)(b)(E) would allow you to accept paid admission to the conference. Further, the receipt of paid admission under ORS 244.020(7)(b)(E) does not need to be reported on your Annual Verified Statement of Economic Interest (SEI).

With regard to the travel, meals and lodging being offered, ORS 244.020(7)(b)(H) allows acceptance of the payment of reasonable travel expenses (food, transportation, or lodging expenses) provided to a public official, as well as to a relative, household member, or staff member accompanying that public official. It applies to events where the public official is representing state government, a local government, or a special

government body on an officially sanctioned trade-promotion or fact-finding mission or in officially designated negotiations or economic development activities. The (H) exception requires:

1. The public official must be representing state government, a local government or a special government body.

2. The purpose of the trip must be for trade promotion or a fact-finding mission, or for negotiations or economic development activities, where receipt of expenses is approved in advance.

3. The activities must be “officially sanctioned or officially designated,” which requires written approval in advance by a person authorized by the public body to provide that approval.

For the first criteria, you would need to be attending the event in your official capacity, as a representative of the Washington County District Attorney’s Office.

For the second criteria, a “fact-finding mission or trip” is defined as “any activity related to a cultural or educational purpose, or any activity aimed at providing intergovernmental assistance, such as for the purpose of international aid or sharing best practices, or developing intergovernmental relationships directly related to the public official’s duties. The sponsor of a fact-finding mission should be directly and immediately associated with the event or location being visited.” [OAR 199-005-0001(2)]. The 2027 Axon Conference appears to have an educational purpose and will include sharing best practices. Thus, it would appear to qualify as a fact-finding mission or trip.

For the third criteria, you will need to have your participation in the trip “officially sanctioned or officially designated” in advance, which requires written approval by a state or local public body or by a person authorized by the public body to provide that

approval. The Administrative Rule goes on to clarify that for elected state court judges and district attorneys, they have the authority to officially sanction or designate events for themselves. [OAR 199-005-0020(3)(b)(E)]. Thus, you can officially sanction or designate the event for yourself.

Finally, as a public official required to file an Annual Verified Statement of Economic Interest (SEI), you will be required to report the aggregate value of the paid expenses for yon your 2028 SEI. ORS 244.060(6) requires public officials to identify all expenses with an aggregate value exceeding $50 when participating in an event described in ORS 244.020(7)(b)(H). Per this requirement, Axon, the source of the paid expenses, should provide you with a written statement of the expenses they paid.

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

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director
SVM/an

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

Oregon
Tina Kotek, Governor

Government Ethics Commission
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September 21, 2026

Sent via email

Honorable Representative Jami Cate
Oregon Legislative Assembly
900 Court St. NE, H-381
Salem, OR 97301

Re: Advice No. 26-637I

Dear Representative Cate,

This letter of advice is provided in response to your request received on September 17, 2026, regarding application of the gift exception in ORS 244.020(7)(b)(H) to paid travel expenses for a fact finding mission or trip to Israel.

The information provided indicates that you have been invited to participate in an upcoming Tour of Israel (Israel Study Tour) for Northwest Legislators. The Israel Study Tour will take place from November 19 to December 4, 2026 and will provide an in-depth exploration of Israel's leadership, society, heritage, and spirit of innovation. The Israel Study Tour will include direct dialogue with local leaders. The Ministry of Foreign Affairs for the State of Israel and the Consulate General of Israel to the Pacific Northwest has extended the invitation and offered to pay all program costs, including travel expenses (transportation, lodging, and meals). You have asked whether you can accept this offer of paid travel expenses for the Israel Study Tour.

In most circumstances, when a public official is offered something of economic value at no cost or at a discount, and it is not offered to others, who are not public officials, on the same terms and conditions, it is considered a gift, as defined in ORS 244.020(7)(a), and subject to the gift clause in ORS 244.025(1). There are exceptions, however, for items that do not qualify as gifts under one of the exceptions in ORS 244.020(7)(b).

ORS 244.020(7)(b)(H) allows acceptance of the payment of reasonable travel expenses (food, transportation, or lodging expenses) provided to a public official, as well as to a relative, household member, or staff member accompanying that public official. It applies to events where the public official is representing their government body on an officially sanctioned trade-promotion or fact-finding mission or in officially designated negotiations or economic development activities. The (H) exception requires:

1. The public official must be representing state government, a local government or a special government body.
2. The purpose of the trip must be for trade promotion or a fact-finding mission, or for negotiations or economic development activities, where receipt of expenses is approved in advance.
3. The activities must be "officially sanctioned or officially designated," which requires written approval in advance by a person authorized by the public body to provide that approval.

For the first criteria, you would need to be attending and participating in the Israel Study Tour in your official capacity, as a state representative.

For the second criteria, a "fact-finding mission or trip" is defined as "any activity related to a cultural or educational purpose, or any activity aimed at providing intergovernmental assistance, such as for the purpose of international aid or sharing best practices, or developing intergovernmental relationships directly related to the public official's duties. The sponsor of a fact finding mission should be directly and immediately associated with the event or location being visited." [OAR 100-004-0001(2)]. The Israel Study Tour appears to have an educational purpose and involves developing intergovernmental relationships and sharing best practices. Thus, it appears to qualify as a fact-finding mission or trip.

For the third criteria, in terms of getting the event "officially sanctioned or officially designated," for members of the Legislative Assembly, the written approval must be provided by the President of the Senate, Speaker of the House, the designated majority or

minority leaders of either chamber or appointed committees of the Legislative Assembly, unless the public body determines otherwise [OAR 199-005-0020(3)(b)(C)]. Thus, for you to accept the paid travel expenses for the Israel Study Tour, you would need to follow the procedures required by the leadership in the Legislative Assembly to ensure that the event was officially sanctioned or designated.

Finally, legislators are required to file an annual Statement of Economic Interest (SEI). ORS 244.060(6) requires SEI filers to identify all expenses with an aggregate value exceeding $50 received during the preceding calendar year when participating in a convention, mission, trip or other meeting described in ORS 244.020(7)(b)(H). Thus, you will need to identify the event and source of paid travel expenses on your 2027 SEI. The source paying the expenses will need to provide you with written notification of the expenditure.

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

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

*****DISCLAIMER*****

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

Oregon
Tina Kotek, Governor

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

September 22, 2026

Sent via email

Travis Meuwissen
Miles Palacios
Hospital Association of Oregon
12909 SW 68th Pkwy
Tigard, OR 97223

Re: Advice No. 26-644I

Dear Travis Meuwissen and Miles Palacios,

This letter of advice is provided in response to your requests for advice regarding application of the gift exception in ORS 244.020(7)(b)(H) to legislators receiving paid travel expenses from the Hospital Association of Oregon (HAO) to attend its Annual Member Meeting.

The information provided indicates that HAO would like to invite various legislators, including Senator Bruce Starr, Senator Anthony Broadman, Representative Ben Bowman, Representative Emily McIntire, and Representative Rob Nosse, to attend the 2026 HAO Annual Member Meeting taking place in Sunriver on October 6-7, 2026. The agenda for this Annual Member Meeting indicates there will be panels and breakout sessions on topics such as public policy and legislative agendas, the future of health care, and the rural health transformation program. Additionally, all five of these legislators will serve as panelists for a session from 9:30 to 10:30 on Wednesday, October 7. HAO has offered to pay for the travel expenses for these legislators participating in the HAO Annual Member Meeting. You have asked whether the legislators can accept the offer of paid travel expenses from HAO under the gift exception in ORS 244.020(7)(b)(H).

In most circumstances, when a public official is offered something of economic value at no cost or at a discount, and it is not offered to others, who are not public officials, on the same

terms and conditions, it is considered a gift, as defined in ORS 244.020(7)(a), and subject to the gift clause in ORS 244.025(1). There are exceptions, however, for items that do not qualify as gifts under one of the exceptions in ORS 244.020(7)(b).

ORS 244.020(7)(b)(H) allows acceptance of the payment of reasonable travel expenses (food, transportation, or lodging expenses) provided to a public official, as well as to a relative, household member, or staff member accompanying that public official. It applies to events where the public official is representing their government body on an officially sanctioned trade-promotion or fact-finding mission or in officially designated negotiations or economic development activities. The (H) exception requires:

1. The public official must be representing state government, a local government or a special government body.
2. The purpose of the trip must be for trade promotion or a fact-finding mission, or for negotiations or economic development activities, where receipt of expenses is approved in advance.
3. The activities must be “officially sanctioned or officially designated,” which requires written approval in advance by a person authorized by the public body to provide that approval.

For the first criteria, the legislators will need to be participating in the HAO Annual Member Meeting in their official capacities, as state senators and representatives. Based on the agenda, it appears that all five legislators will be attending and participating on the panel in their official capacities.

For the second criteria, a “fact-finding mission or trip” is defined as “any activity related to a cultural or educational purpose, or any activity aimed at providing intergovernmental assistance, such as for the purpose of international aid or sharing best practices, or developing intergovernmental relationships directly related to the public official’s duties. The sponsor of a fact finding mission should be directly and immediately associated with the

event or location being visited." [OAR 100-004-0001(2)]. The HAO Annual Member Meeting appears to have an educational purpose and thus would qualify as a fact-finding mission.

For the third criteria, in terms of getting the event "officially sanctioned or officially designated," for members of the Legislative Assembly, the written approval must be provided by the President of the Senate, Speaker of the House, the designated majority or minority leaders of either chamber or appointed committees of the Legislative Assembly, unless the public body determines otherwise. [OAR 199-005-0020(3)(b)(C)]. Each of the legislators will need to follow the procedures required by the leadership in their respective houses to ensure that the event is officially sanctioned or designated.

Finally, legislators are required to file an annual Statement of Economic Interest (SEI). ORS 244.060(6) requires SEI filers to identify all expenses with an aggregate value exceeding $50 received during the preceding calendar year when participating in a convention, mission, trip or other meeting described in ORS 244.020(7)(b)(H). Thus, the participating legislators will need to identify the event and source of paid travel expenses on their 2027 SEIs. HAO will need to provide each of them with written notification of the expenses paid.

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

Sincerely,

Susan V. Myers

Susan V. Myers
Executive Director

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Telephone: 503-378-5105
Fax: 503-373-1456
E-mail: mail@ogec.oregon.gov
Website: www.oregon.gov/ogec

September 25, 2026

Sent via email to
heather.vanmeter@millernash.com

Heather Van Meter
Miller Nash LLP
500 Broadway St, Ste. 400
Vancouver, WA 98660

Re: Complaint against OGEC staff

Dear Ms. Van Meter:

As the Executive Director of the Oregon Government Ethics Commission (OGEC), I am providing this letter in response to your September 21 and September 25 emails to me, as well as the related email correspondence with OGEC's Compliance & Enforcement Coordinator, Casey Fenstermaker. A copy of this letter will also be provided to OGEC's Commissioners.

I understand that you are requesting copies of OGEC's policies or procedures for making a complaint regarding an OGEC employee's conduct in an investigation. The process for making such a complaint would be to send correspondence with the complaint and any related materials to me as the executive director. Per ORS 244.310(2), the executive director is responsible for the administrative operations of the agency. Upon receipt of such correspondence, I would review the complaint and any related documents and conduct interviews in order to determine the relevant facts and evaluate the merits of the complaint. If warranted by that review, appropriate corrective action could be taken.

Based upon your email correspondence, I have already begun the process of gathering and reviewing the information provided by you, Casey Fenstermaker, and the two investigators

involved in the related cases. The information reviewed thus far is summarized below. While this review has begun and will continue, you are certainly still welcome to submit a more formal complaint if you wish to do so.

Background Information

On or about February 13, 2026, OGEC received seven separate complaints submitted against public officials (both governing body members and employees) with the same public body. Cases for each of the seven public officials were opened in preliminary review and assigned to one of two investigators. The investigators prepared preliminary review reports for each of the cases. Those preliminary review reports were reviewed by Casey Fenstermaker, and then by our DOJ counsel, and finally they were reviewed, approved, and signed by me. Copies of their preliminary review reports were provided to you for the four officials you represented, and copies of their respective reports were provided to the three unrepresented officials. The preliminary review reports were then presented to the Commission at its meeting on May 8, 2026.

On the day of the Commission meeting you provided the investigators with supplemental information and documents related to your client's cases. You also attended and spoke with the Commission during the executive session where those four cases were presented. While you were still present in the executive session, the Commission voted to open investigations for the cases involving your four clients. After you left the executive session, the Commission also voted to open investigations for the three cases involving the unrepresented officials. The minutes and recordings of the executive session are available here if you would like to review them: https://www.oregon.gov/ogec/about-us/Pages/meetings.aspx

On May 8, 2026, following the Commission meeting, the investigators sent email notices to you and to the unrepresented officials confirming that the Commission had voted to conduct investigations in each of their cases. You have confirmed receiving this email notice. The

email notice explained that the investigation would take no more than 180 days, and that an investigative report would be considered by the Commission at a future meeting. The notice indicated that this future meeting would likely be on November 13, 2026. Later on that same day, May 8, the investigators sent a second email to correct the date of the future Commission meeting to October 9, 2026.

Proposed Stipulated Final Orders

On or about September 17, the two investigators sent emails to you and to the three unrepresented officials attaching proposed stipulated final orders for each of the cases. The emails indicated that entering a stipulated final order was one option for resolving their cases in lieu of presenting an investigative report to the Commission. The email explained the stipulated final orders could be negotiated and that you/they were welcome to submit a counterproposal, and that if agreed to the stipulated final orders would still need to go to the Commission for formal approval.

You sent several emails in response. You informed us that due to the lack of communication from OGEC, you believed the matters had been resolved with no further action and you had closed your files on these cases. You indicated that we should communicate with your former clients directly.

As I understand from your other emails, the crux of your complaint appears to be that you were told by one of the unrepresented officials that the investigator had indicated you had already approved the stipulated final order and that you had recommended they sign it. You were subsequently informed by Casey Fenstermaker that the investigator denied making such statements, and that what the investigator had told the person was that “other people involved were actively considering agreement to the offer of a letter of education” in stipulated final orders similar to the one offered to that official.

This latter statement by the investigator appears to be accurate. At approximately the same date and time, similar proposed stipulated final orders were sent to all seven officials in

these cases. Our expectation was that those officials would actively consider the proposals and either choose to proceed with an investigative report, accept the stipulated final order as presented, or submit a counterproposal. And this is, in fact, what occurred. At least one of the officials indicated they will not agree to a stipulated final order; one official agreed to the proposed order as presented; and two of the officials submitted counterproposals.

As indicated above, my review of this matter will continue, but you are welcome to submit a formal complaint if you wish. You may do so by sending it to me by mail to the address above or by email to susan.myers@ogec.oregon.gov.

Sincerely,

Susan V. Myers

Susan V. Myers

Executive Director

Heather J. Van Meter
Partner
Heather.VanMeter@MillerNash.com
360.619.7038 (direct)

September 28, 2026

VIA E-MAIL, FIRST CLASS MAIL

Susan Myers, Executive Director
Susan.myers@ogec.oregon.gov
Oregon Government Ethics Commission
3218 Pringle Rd. SE, Suite 220
Salem OR 97233

Shenoa Payne, Chair
Oregon Government Ethics Commission
spayne@paynelawpdx.com
c/o Shenoa Payne Attorney at Law PC
1500 SW 1st Ave., Suite 1000
Portland OR 97201

Subject: Complaint against OGEC Investigators' Unethical Conduct in Investigation

Dear Susan and Shenoa:

This letter is to notify you of a serious matter and ethics breach involving your investigators, Silas Patterson and Josh Sullivan. I ask that you provide a copy of this letter with the October 9 Commission meeting packet or otherwise to all Commissioners for their consideration.

I previously represented some (not all) persons relating to vague allegations from Tyler Miller against numerous Columbia 9-1-1 Communications District persons. While the allegations were too vague to meaningfully respond, I did attempt to respond on behalf of those persons I represented (former Board member Henry Heimuller, former Board member Bruce Holsey, former executive director Mike Fletcher, and executive director Jeremy Hipes). Following submission of an initial response to the vague allegations, I first received communications from investigators Josh Sullivan and Silas Patterson "Preliminary Review Reports" regarding actual alleged violations of ORS Chapter 244 on April 4, 2026.

This was the first notice of any discernible particular alleged violations. In response, I requested the ability to provide additional information and documents that were pertinent to the newly-

identified alleged violations. Mr. Patterson stated that no such submission would be accepted prior to the May 8, 2026 Commission proceeding, nor would I be permitted to submit such a letter for the Commission's consideration because it was "too late." No deadline for such submission was ever conveyed, nor did the persons involved have an understanding of what they were alleged to have violated until after it was apparently "too late" to offer or provide any information or explanation. Without the benefit of any information from the persons subject of the complaint, the Commission voted on May 8, 2026 to "conduct an investigation relating to possible violations of ORS Chapter 244." That same day, I submitted the letter and attached relevant documents that I had requested to submit prior to the meeting but was denied the opportunity because it was "too late."

After my May 8, 2026 submission refuting the allegation that any violations of ORS Chapter 244 occurred, providing the operating procedures that are necessary pursuant to recommended and proper public accounting procedures including internal financial controls, and establishing that no violations occurred. I received no response at all. After several months of waiting, I ultimately closed my files on the matter, believing that the documents and explanation were sufficient to show no violations occurred and concluding neither investigator had any questions.

On September 17, 2026, I was informed that Silas Patterson (OGEC investigator) sent a communication to Rob Anderson (former Board member) on September 17, 2026 at 10:46 a.m., stating he "*wanted to reach out to establish contact with you [Mr. Anderson]*" and was preparing a stipulated final order and that *"[b]y agreeing to the stipulated facts and accepting a letter of education your case would be closed without having to go through a full investigation*." This communication was false and misleading. Mr. Patterson's proposed stipulated final order that Mr. Patterson was asking he sign actually states an investigation was concluded, a violation found to exist, and proposing a letter of education in lieu of other possible fines or penalties.

Furthermore, Mr. Patterson spoke with Mr. Anderson by phone on September 17, 2026. Mr. Anderson was not represented by an attorney. During this phone call, Mr. Patterson reportedly informed Mr. Anderson that I had reviewed or approved the settlement agreement, and that all other persons involved were actively considering agreeing to the same settlement agreement he was being offered. This communication was false and misleading. At the time Mr. Patterson and Mr. Sullivan had not proposed any settlement agreements to any other persons (no other persons received proposed settlement agreements until September 18, 2026 vie email). It

appears clear that Mr. Patterson was attempting to induce Mr. Anderson to agree to the proposed settlement agreement based on his false and misleading statements.

Due to Mr. Patterson's apparent false statements to Mr. Anderson, that I had reviewed or approved the settlement agreement(s), I was not able to re-open my files to assist any of the individuals.

To be clear, no "investigation" appears to have taken place at all. Neither I nor any of the other individuals ever received any request for interview or records or explanation, nor any "investigation report" that Mr. Sullivan and Mr. Patterson both informed individuals would be presented to the Commission, and nobody has any understanding of the content of any "investigative report" or basis for any findings. Neither Josh Sullivan nor Silas Patterson ever contacted me, requested to interview anyone, requested any follow-up information or documents, or took any steps to investigate or understand the public accounting procedures or financial controls process or other applicable laws and audit procedures for this process.

It appears most likely that Mr. Sullivan and Mr. Patterson placed this entire matter on a back-burner, conducted no investigation at all. Then when a deadline to act prior to the Commission's October 9 meeting was upcoming they simply prepared false settlement agreements, communicated false information to the persons involved, and attempted to clean up their lack of investigation by getting people to sign the false settlement agreements without the Commission or supervisors knowing of their lapses.

Compounding all of these serious errors, in their communications with the persons involved, both Mr. Sullivan and Mr. Patterson offered to review "counterproposals" from the persons involved to "submit for approval." Then when counterproposals were made they were summarily rejected.

Mr. Patterson and Mr. Sullivan also repeatedly mis-reported who I represented throughout this matter, including when sending proposed settlement proposals, varyingly writing that I represented Jeff Flatt or Shelley Hennessey or others, and sending me communications relating to them (breaching confidentiality).

I communicated my serious concerns to Mr. Sullivan, Mr. Patterson, and others on September 18, 2026 and thereafter. Ms. Fenstermaker, the investigators' supervisor, confirmed by phone call that Mr. Patterson had indeed informed Mr. Anderson on September 17, 2026 by phone

that others were also considering the proposed settlement agreements. This was, of course, impossible, since no other persons had even received any proposed settlement agreements at the time. Ms. Fenstermaker stated that Mr. Patterson simply "misspoke." This is incredible. It is clear that Mr. Patterson was attempting to induce Mr. Anderson to sign a settlement agreement based on false and misleading statements, then likely attempt to use Mr. Anderson's acquiescence to induce others to sign, again based on false and misleading information.

I requested the recordings or notes from the communications at issue, but was only provided incomplete notes that made no mention at all of the false and misleading information Mr. Patterson used with Mr. Anderson. I was informed no recordings were made. I followed up to request the policy/procedure for making a complaint against the investigator.

After three separate requests for the policy/procedure for making complaints relating to OGEC staff, I received a letter response after-hours at 7:32 p.m. on Friday, September 25, 2026 from Susan Myers, essentially stating she did not think anything was wrong but she would "look into" it. In other words, Ms. Myers has already pre-judged and appears ready to rubber-stamp the above-detailed behavior. While allegiance to staff is common, in an Ethics Commission setting it is inappropriate.

By this letter, I ask that an immediate investigation of the conduct and the false and misleading statements and unethical conduct recounted above be fully investigated by an impartial, third party investigator. Unethical conduct by OGEC investigators affects all of us and is deeply disturbing. I also ask that, in the interest of fairness (and not on behalf of any individual involved, as I do not currently represent any), that some attempt be made to right the wrongs that have been committed in this matter.

Finally, this letter asks that you respond by acknowledging receipt of this letter.

Sincerely,

Heather Van Meter

Heather J. Van Meter

Cc: Oregon Department of Administrative Services, Chief Human Resources Officer (chro.investigations@das.oregon.gov)

MEMORANDUM

To: Oregon Government Ethics Commission

From: Susan V. Myers, Executive Director SVM

Date: September 28, 2026

Subject: Conflict of Interest Delegation of Authority

In the event the executive director is met with a statutory conflict of interest, they are required to submit to the Commission a written notice of the nature of their conflict of interest and request that the Commission dispose of the matter giving rise to the conflict of interest. The Commission can do so by either assigning the matter to another person to handle, or by directing the executive director to handle the matter in a specified manner.

To ensure the Commission can take this action in a timely manner, this memorandum recommends the Commission delegate to the Commission Chair and Vice-Chair the authority to take the necessary action. In the event the executive director submits a conflict of interest disclosure, action could be taken by the Commission Chair, or the Commission Vice-Chair if the Commission Chair is not available. At a subsequent meeting the Commission could then ratify or alter the action taken by the Commission Chair or Vice-Chair.

Motion: I hereby move the Commission delegate authority to the Commission Chair and the Commission Vice-Chair to dispose of matters giving rise to conflicts of interest for the executive director.

OGEC Training Report

October Commission Meeting Facilitators

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

September Training Highlights

Accessibility Workgroup

- The Accessibility Workgroup met three times this month and worked on the following projects:
    - Reviewing the newsletter for accessibility
    - Finalizing the accessibility format for correspondence letters
    - Continuing work on the Style Guide
    - Beginning accessibility updates for the JC and SEI guides
- Lex gave an accessibility presentation to the entire staff during the September 16 staff meeting.

Public Meetings Law Trainings

- Ruth traveled to Drain to provide a training on Public Meetings Law to the City of Drain and other public officials in the surrounding area.
- Stephanie is partnering with DAS HR to work on a series of Public Meeting Law trainings for DAS recruiters who will be assisting several agencies in their executive director recruitment processes.
- The training team is currently developing an online asynchronous (on-demand) training on Public Meetings Law for all public officials. This is scheduled to be available through Workday in January 2027.

Government Ethics Law Trainings

- Angela traveled to The Dalles to provide a training on Gifts to Wasco County.

- Chris traveled to Florence and Newport to deliver Ethics Overview training to the Oregon Association of County Treasurers and Finance Officers and City of Newport, respectively.
- Stephanie is partnering with the Governor's office to offer new Ethics Law training focused on conflicts of interest, prohibited use of office for board members involved in the grant making process. These sessions are due to pilot in January 2027.

Jurisdictional Contact Trainings

- Amber, our new Administrative Specialist, completed additional training for her new role by attending a Jurisdictional Contact webinar this month.
- Stephanie and Amber traveled to Lincoln City to attend the Oregon Association of Municipal Recorders (OAMR) 2026 annual conference where they were offered a table. Members of the training team created a special web page and outreach materials for the event. This provide Amber an opportunity to meet the Jurisdictional Contacts for cities, which she will be working with as she supports the 2027 Statement of Economic Interest filing season.

Communications

- Unique open rate for email bulletin communications sent through Granicus Communications during September 2026 was 46.1%. This continues to be higher than industry standard.

Training Outreach & Collaboration

- Director Myers, Stephanie and the rest of the training team met with the Oregon Fire Chief's Association on September 9 to discuss a partnership with their organization to offer 20 training sessions across the state in 2027 that will include Public Meetings Law and Ethics Law training.

Staffing

- Molly, our Administrative Support Specialist, accepted a new role with another state agency and is no longer with OGEC effective September 25. She was an instrumental part of our agency and the training team and will truly be missed!

Trainings Completed (September 1 – September 28, 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	Wasco County	The Dalles
ORS 244	Four Rivers Vector Control District	Online
ORS 244	Oregon Association of County Treasurers and Finance Officers	Florence
ORS 192	Oregon Department of Education	Online
ORS 244	City of Newport (City of Waldport & Reedsport)	Newport
ORS 192	Department of Administrative Services (DAS) Recruiters	Online
ORS 192	City of Drain	Drain

OGEC Webinars (September 1 – September 28, 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	September
ORS 244	New Employee	1 Session
ORS 244	New Councilor or Commissioner	1 Session
ORS 244	Use of Office/Conflicts of Interest	1 Session
ORS 244	Gifts	1 Session
ORS 244	Jurisdictional Contact	1 Session
ORS 192	Public Meetings Law	4 Sessions
ORS 192	Executive Sessions	1 Session

EXECUTIVE DIRECTOR'S REPORT
09/30/2026

Recruitment
Administrative Specialist 2 Molly Putnam has left the agency and moved on to another state agency. We wish Molly all the best in her new position. The recruitment process for a new Admin. Specialist 2 will begin soon.

Public Meetings Law Workgroup
The legislative workgroup focusing on public meetings law is continuing its meetings. The next meeting is scheduled for Thursday, October 15.

Separately, we have been holding meetings with representatives of some of the associations and with public officials who have gone through OGEC's case process to talk through proposals for an alternative enforcement process for public meetings law cases.

Meetings with Associations
We have scheduled a special meeting on November 12 at 2 pm for the Commission to hold another work session with representatives from the League of Oregon Cities, the Special Districts Association of Oregon, the Oregon Community Colleges Association, and the Association of Oregon Counties.

Separately, we are also reaching out to other associations to invite them to participate in similar opportunities to meet with OGEC staff and/or with the Commission.

Complaint Data
As requested, we are assembling data on the number of and type of complaints by location/entity. While this project is ongoing, I wanted to provide some initial data:

For calendar year 2025: 768 complaints submitted – about 412 cases opened

Ethics and Lobby Cases

Conflicts of Interest – 86

Prohibited Use of Office – 69

Lobby – 11

Statement of Economic Interest - 8

Confidential Information – 7

Gifts – 7

Legal Expense Trust Fund – 5

Nepotism – 5

Official Compensation Package – 4

Business - 3

Class Exception – 2

Food, Travel, Lodging – 2

Outside Employment – 2

Post employment Restrictions - 1

Public Meetings Law Cases

***Cities*:**

City of Gervais

City of Johnson City

City of Salem

City of Waldport

City of Lakeside

City of Rivergrove

City of King City

City of Maywood Park

City of Portland

City of Madras

City of Newport

City of Shady Cove

City of Ashland

***Counties**:*

Lincoln County

Metro

Educational:

Riverdale School District

Camas Valley School

Siletz Valley School

Oregon Trail Primary Academy

Springfield School District

Lane Community College

Special Districts:

Klamath County Fire District #3

Madras Aquatic Center

Lebanon Aquatic Center

Ochoco West Water & Sanitary Authority

Blue River Water District

Three Sisters Irrigation District

***State Agencies**:*

Oregon Public Defense Commission

Other:

Mid-Willamette Valley Homeless Alliance

Columbia Development Authority

OREGON GOVERNMENT ETHICS COMMISSION
AY27 CASH FLOW
AS OF JULY 2026 ACTUALS

	Appn 30000 - Admin - PCA 41501				Appn 70000 - GF - PCA 00501			
	Actuals To Date	Actuals + Projected	2025-2027 LAB	Variance	Actuals To Date	Actuals + Projected	2025-2027 LAB	Variance
Beginning Cash Balance	1,041,552.16	1,041,552.16	715,787.00 18,521.00		-	-		
REVENUE								
0415 ADMINISTRATIVE AND SERVICES CHARGES	5,371,678.99	7,056,113.46	7,005,742.00	(50,371.46)	-	-	-	0.00
0505 FINES AND FORFEITS	551.43	551.43	-	(551.43)	98,581.08	98,581.08	50,000.00	(48,581.08)
0975 OTHER REVENUE	-	-	-	0.00	-	-	-	0.00
Total Revenue	**5,372,230.42**	**7,056,664.89**	**7,740,050.00**	(50,922.89)	**98,581.08**	**98,581.08**	**50,000.00**	(48,581.08)
TRANSFERS								
2010 TRANSFER OUT TO OTHER FUNDS	-	-	-	0.00	-	-	-	0.00
1107 TRANSFER IN FROM DEPT OF ADMIN SVCS	-	-	(50,000.00)	(50,000.00)	-	-	-	0.00
Total Transfers	**-**	**-**	**(50,000.00)**	(50,000.00)	**-**	**-**	**-**	0.00
Total Available Revenues			**7,690,050.00**					
PERSONAL SERVICES								
3110 CLASS/UNCLASS SALARY & PER DIEM	1,300,653.50	2,632,559.97	2,717,088.00	84,528.03	-	-	-	0.00
3115 BOARD MEMBER STIPENDS	10,858.00	24,564.00	29,065.00	4,501.00				
3160 TEMPORARY APPOINTMENTS	-	-	548.00	548.00	-	-	-	0.00
3170 OVERTIME PAYMENTS	-	-	-	0.00	-	-	-	0.00
3190 ALL OTHER DIFFERENTIAL	12,570.99	23,780.16	-	(23,780.16)				
3210 ERB ASSESSMENT	495.00	957.00	1,080.00	123.00	-	-	-	0.00
3220 PUBLIC EMPLOYES' RETIREMENT SYSTEM	274,845.63	572,942.79	534,682.00	(38,260.79)	-	-	-	0.00
3221 PENSION BOND CONTRIBUTION	53,491.67	118,253.07	99,125.00	(19,128.07)	-	-	-	0.00
3230 SOCIAL SECURITY TAX	102,136.39	205,865.71	195,827.00	(10,038.71)	-	-	-	0.00
3241 PAID LEAVE OREGON-EMPLOYER	5,340.43	10,366.51	10,163.00	(203.51)				
3250 WORKERS' COMPENSATION ASSESSMENT	242.78	529.88	630.00	100.12	-	-	-	0.00
3260 MASS TRANSIT	7,879.10	15,790.65	15,344.00	(446.65)	-	-	-	0.00
3270 FLEXIBLE BENEFITS	325,775.87	645,642.37	636,120.00	(9,522.37)	-	-	-	0.00
3465 RECON ADJUSTMENT	-	-	-	0.00				
Total Personal Services	**2,094,289.36**	4,251,252.11	4,239,672.00	(11,580.11)	**-**	**-**	**-**	0.00
SERVICES AND SUPPLIES								
4100 INSTATE TRAVEL	6,273.53	54,673.53	25,398.00	(29,275.53)	-	-	-	0.00
4125 OUT-OF-STATE TRAVEL	-	5,000.00	-	(5,000.00)	-	-	-	0.00
4150 EMPLOYEE TRAINING	6,410.61	61,410.61	25,453.00	(35,957.61)	-	-	-	0.00
4175 OFFICE EXPENSES	9,929.02	18,729.02	38,980.00	20,250.98	-	-	-	0.00
4200 TELECOMM/TECH SVC AND SUPPLIES	16,471.66	32,971.66	49,674.00	16,702.34	-	-	-	0.00
4225 STATE GOVERNMENT SERVICE CHARGES	103,664.63	188,803.10	195,536.00	6,732.90	-	-	-	0.00
4250 DATA PROCESSING	56,562.85	106,409.96	124,288.00	17,878.04	-	-	-	0.00
4275 PUBLICITY & PUBLICATIONS	652.28	652.28	2,490.00	1,837.72	-	-	-	0.00
4300 PROFESSIONAL SERVICES	407.26	407.26	12,119.00	11,711.74	-	-	-	0.00
4315 IT PROFESSIONAL SERVICES	245,364.50	846,414.50	957,186.00	110,771.50	-	-	-	0.00
4325 ATTORNEY GENERAL LEGAL FEES	338,143.60	843,686.40	915,394.00	71,707.60	-	-	-	0.00
4375 EMPLOYEE RECRUITMENT & DEVELOPMENT	-	-	5,161.00	5,161.00	-	-	-	0.00
4400 DUES AND SUBSCRIPTIONS	-	-	3,018.00	3,018.00	-	-	-	0.00
4425 FACILITIES RENT & TAXES	76,267.10	142,470.92	201,106.00	58,635.08	-	-	-	0.00
4575 AGENCY PROGRAM RELATED SVCS & SUPP	1,486.76	1,486.76	52,100.00	50,613.24	-	-	-	0.00
4650 OTHER SERVICES AND SUPPLIES	107,314.82	217,133.27	330,813.00	113,679.73	-	-	-	0.00
4700 EXPENDABLE PROPERTY $250-$5000	1,801.69	1,801.69	32,820.00	31,018.31	-	-	-	0.00
4715 IT EXPENDABLE PROPERTY	29,657.55	29,657.55	75,000.00	45,342.45	-	-	-	0.00
Total Services and Supplies	**1,000,407.86**	**2,551,708.51**	**3,046,536.00**	494,827.49	**-**	**-**	**-**	0.00
5900 OTHER CAPITAL OUTLAY								
TOTAL EXPENDITURES	**3,094,697.22**	**6,802,960.62**	**7,286,208.00**	**483,247.38**	**-**	**-**	**-**	**0.00**
Ending Cash Balance* *Outstanding Revenue Invoices not taken into consideration, See Appn Tabs	**3,319,085.36**	**1,295,256.43**			98,581.08	98,581.08		

283,456.69 Avg Monthly Expenditures

1,295,256.43 Projected Cash Ending Balance

4.57 Month Ending Balance

Level 3 - Restricted