

OREGON GOVERNMENT ETHICS COMMISSION

PRELIMINARY REVIEW

CASE NO: 25-351EJS

DATE: August 21, 2025

RESPONDENT: HARRINGTON, Kathryn, Member and Chair, Board of Directors, Clean Water Services

COMPLAINANT: KNUDSEN, Dirk

RECOMMENDED ACTION: Move to Investigate Possible Violations of ORS 244.040(1), ORS 244.060(5), and ORS 244.120(2)

PRELIMINARY REVIEW: The Oregon Government Ethics Commission (Commission) received a signed written complaint on June 24, 2025 from Dirk Knudsen. Dirk Knudsen alleges that Kathryn Harrington, Member and Chair of the Board of Directors (Board) for Clean Water Services, may have violated Oregon Government Ethics Law by using her official position for personal financial gain. (#PR1). Receipt of the complaint was acknowledged in letters to Dirk Knudsen and Kathryn Harrington. Kathryn Harrington was provided with the information received in the complaint and invited to provide any information that would assist the Commission in conducting this preliminary review.

Background Information

Clean Water Services (CWS) is a County Service District under ORS Chapter 451 and a special district under ORS Chapter 198 that serves as a separately managed and financed public utility in Washington County. The CWS Board of Directors is made up of five elected officials who also serve as Washington County Commissioners. Kathryn Harrington has served as the CWS Board Chair since 2019. (#PR2).

Complaint

In the complaint, Dirk Knudsen states that Kathryn Harrington, as Board Chair for the CWS Board of Directors, travelled on behalf of CWS and accepted unauthorized travel

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

The complaint states that Kathryn Harrington may have traveled domestically and internationally for CWS, including travel to:

- Copenhagen, Denmark - for the 2022 International Water Association (IWA) Congress
- Vientiane, Laos - to close out a multi-year “utility partnership”
- Singapore - for Singapore International Water Week (#PR1).

The complaint asserts that CWS Board Members were not qualified to participate in these trips, and more relevant executives from appropriate divisions within CWS could have been utilized. The complaint also states that CWS executives may have used elaborate travel, meals, and gifts to obtain the goodwill of the CWS Board members in an attempt to influence policies and obtain budgetary increases. (#PR1).

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

Response

On July 17, 2025, Kathryn Harrington provided Commission staff with a written response to the complaint. In the response, Kathryn Harrington provides information related to her domestic and international travel on behalf of CWS and her participation

1 in the various conferences she attended. She also provided receipts and travel expense
2 records for her CWS travel. (#PR3).

3
4 2022 Copenhagen, Denmark - IWA Conference

5 Kathryn Harrington states that she attended the 2022 International Water Association
6 conference in Copenhagen, Denmark on behalf of CWS. She explains that the Board
7 attended sessions and workshop tours to learn firsthand about surface water
8 management and wastewater recovery. (#PR3).

9
10 The travel records indicate that CWS paid for attendees' flights, hotels, meals, and
11 conference registration for the event. The invoices indicate that Kathryn Harrington flew
12 economy on Delta Airlines and stayed in a "standard" hotel room at the conference
13 hotel, the Marriott AC Bella Sky Hotel. The Copenhagen IWA trip was a seven day
14 event. Kathryn Harrington extended her stay in Copenhagen by three days, arriving in
15 Copenhagen on September 8, 2022 and departing on September 18, 2022. (#PR4,
16 #PR5, #PR6)

17
18 The records indicate that CWS booked a 10-night stay for Kathryn Harrington at the
19 conference hotel, and she reimbursed CWS for three nights that were for personal
20 business. (#PR7, #PR4).

21
22 Kathryn Harrington booked her own travel for this trip, and CWS reimbursed her after
23 she submitted a Travel/Training Reconciliation Form on October 6, 2022. Kathryn
24 Harrington's Delta Air Lines invoice indicates that she included her personal Delta
25 SkyMiles member number, for rewards, when she purchased the tickets. (#PR4, #PR5).

26
27 The itinerary for the Copenhagen trip indicates that, for meals: breakfasts were
28 available at the hotel, lunches were provided at the conference, and group dinners were
29 arranged at nearby restaurants. (#PR6).

30
31 2023 Singapore and Vientiane, Laos - US Water Partners Project

32 Kathryn Harrington states that CWS participated in a program sponsored by the US

1 State Department via a non-profit, US Water Partnership, to help advance water
2 treatment solutions in Asian countries. Kathryn Harrington states that because CWS
3 CEO Diane Taniguchi-Dennis was unable to attend, she participated in the 2023
4 conferences, and Pam Treece participated in the 2024 conferences. (#PR3).

5
6 The information provided indicates that the majority of Kathryn Harrington's expenses
7 for the trip, including her economy airline ticket and hotel accommodations, were paid
8 for by US Water Partnership. Kathryn Harrington flew from Portland to Singapore on
9 June 2, 2023, from Singapore to Vientiane on June 6, 2023, and from Vientiane to
10 Portland on June 10, 2023. The CWS delegation stayed at the Paradox Singapore
11 Merchant Court hotel, the event venue for the Singapore International Water Week
12 (SIWW), and the Crowne Plaza IHG Hotel in Vientiane. (#PR8, #PR9, #PR10).

13
14 From CWS, Kathryn Harrington received \$560.38 for four days per diem, based on the
15 U.S. Department of State foreign per diem rate (GSA rate), and she received roundtrip
16 mileage reimbursement for traveling to the Portland airport. (#PR11).

17
18 When Kathryn Harrington completed her 2024 SEI on April 9, 2024, she submitted a
19 supporting document with receipts for her 2023 trip to Singapore and Laos. Kathryn
20 Harrington's supporting documentation includes the total amount spent by US Water
21 Partnership on her behalf for this trip, \$8,248.03. (#PR12). Kathryn Harrington disclosed
22 on Section 4 of her 2024 Statement of Economic Interest (SEI) that she received paid
23 expenses from US Water Partnership for an international water conference; however,
24 Section 4 of her SEI did not include the total amount of the benefit she received.
25 (#PR13).

26
27 2024 Buffalo, NY - NACWA Utility Leadership Conference

28 Kathryn Harrington states that she traveled to Buffalo, New York to attend the National
29 Association of Clean Water Agencies (NACWA) Conference on behalf of CWS. Kathryn
30 Harrington states that CWS Board Director Roy Rogers' term of service was ending,
31 and, as such, CEO Diane Taniguchi-Dennis and the Board agreed that she should
32 attend the conference for continuity purposes. (#PR3).

1 The conference was scheduled for July 22-26, 2024. Kathryn Harrington states that she
2 extended her stay in New York with personal vacation days from July 27 to August 4,
3 2024, and she used personal funds to pay for the extended stay. (#PR3).

4
5 The Travel/Training Reconciliation Form for Kathryn Harrington's attendance at the
6 NACWA Conference indicates that she was reimbursed \$1023.17 for airfare. The
7 receipts for Kathryn Harrington's airfare show that she paid \$1419.01 for her ticket
8 departing on July 22nd and returning on August 4th. The receipts also indicate that she
9 compared the cost of an airline ticket departing on July 27th, subtracted the difference
10 from her reimbursement request, and personally paid the extra amount. (#PR14).

11
12 Kathryn Harrington stayed at the Hyatt Regency hotel, the designated NACWA
13 conference hotel. The records indicate that the NACWA received a discounted group
14 rate of \$199 per night. When booking the hotel for this trip, Kathryn Harrington
15 specifically requested a "very simple, non-smoking, one bed any size [room]." (#PR14).

16
17 The receipt for Kathryn Harrington's airfare indicates that she included her personal
18 United Airlines frequent flyer number, for rewards, when she purchased her ticket for
19 this trip. (#PR14).

20 21 General Expenses

22 CWS provided multiple spreadsheets of general expenses for the 2022, 2023, and 2024
23 fiscal years. Based on the information in the spreadsheets, CWS appears to have paid
24 for several of Kathryn Harrington's meals and travel supplies for the CWS trip to
25 Singapore and Laos. (#PR19, #PR16, #PR17).

26 27 CWS Travel Policy

28 Commission staff reviewed the CWS Travel Policy, which became effective March 1,
29 2012. Based on the information obtained by Commission staff, this travel policy appears
30 to be the travel policy in effect for all times relevant to this preliminary review. The CWS
31 travel policy states, "It is the District's intent to reimburse *employees* for reasonable,
32 ordinary, and necessary business expenses incurred when traveling on behalf of the

District, in accordance with this Policy” [emphasis added]. Although the CWS travel policy appears to specifically address employee travel, it does not appear to apply to Board Members’ travel. (#PR18).

Washington County Travel Policy

Washington County Policy 402 - Travel and Business Expense, amended on May 18, 2021, states that the policy applies to anyone traveling on County business unless otherwise directed by contract. The policy further clarifies that the elected officials are employees of the County for income tax purposes and, for this reason, are subject to this policy. The policy states that travel and business expenses must be “reasonable and necessary.” It states that individuals traveling on County business are expected to be prudent and only incur costs they normally would incur if traveling at their own expense, and expenses solely for the benefit of an individual are not allowable. (#PR19).

Tanya Ange Phone Call

On August 6, 2025 Commission staff spoke with Tanya Ange, County Administrator for Washington County. Tanya Ange explained that CWS used to be a component unit of Washington County, but CWS has since separated from Washington County. She explained that, although the same individuals serve both governing bodies, they function as separate entities with their own organizational structures and policies. (#PR20).

Tanya Ange explained that Washington County Commissioners need to apply for approval of County training and travel through the County Administrative Office to ensure that there are funds available in the budget for their travel, and to ensure that it is within policy. She explained that the County is not responsible for reviewing CWS travel. She stated that, when on County business, the Commissioners are subject to County policy, and when on CWS business, they are subject to CWS policy. (#PR20).

Statutory Authority

ORS 198.190 allows for special districts, including CWS, to provide compensation of up to \$50 per day to its Board Members. Additionally, ORS 192.190 authorizes “[t]he governing body may provide reimbursement of a member for actual and reasonable

1 traveling and other expenses necessarily incurred by a member in performing official
2 duties.” In this instance, the CWS Board of Directors is the “governing body.”
3

4 Amended 2024 SEI

5 On August 7, 2025, Kathryn Harrington notified Commission staff that she amended her
6 2024 SEI. On Section 4, Kathryn Harrington disclosed the total amount of the benefit
7 she received from US Water Partnership, \$8248.03. Kathryn Harrington stated that she
8 made an oversight in not including the amount of the benefit which was included in the
9 supporting documentation she had already submitted. (#PR21, #PR22)
10

11 **RECOMMENDATION:** Kathryn Harrington is a member and the Board Chair for the
12 Clean Water Services Board of Directors and has held that position since 2018. As
13 such, she is a public official, as defined in ORS 244.020(15), and therefore subject to
14 Oregon Government Ethics Law.
15

16 Use of Office

17 ORS 244.040(1) prohibits a public official from using or attempting to use the official's
18 position to obtain a financial benefit or avoid a financial detriment for the official, a
19 relative or household member, or a business with which any of them are associated, if
20 the financial benefit or avoidance of detriment would not otherwise be available but for
21 the public official's holding the official position. This provision applies regardless of
22 whether the public official had disclosed an actual or potential conflict of interest. [ORS
23 244.040(8)]. ORS 244.040(2)(a) provides an exception that permits public officials to
24 accept any part of an official compensation package without violating ORS 244.040(1).
25 ORS 244.040(2)(c) provides an exception that permits public official to accept
26 reimbursement of expenses without violating ORS 244.040(1).
27

28 The term “official compensation package” is defined as the wages and other benefits
29 provided to a public official. To be part of a public official's “official compensation
30 package,” the wages and benefits must have been specifically approved by the public
31 body in a formal manner, such as through a union contract, an employment contract, or
32 other adopted personnel policies that apply generally to employees or other public

1 officials. The term also includes the direct payment of a public official's expenses by the
2 public body, in accordance with the public body's policies. [OAR 199-008-0005(3)].

3
4 The term "reimbursement of expenses" is defined to mean the payment by a public
5 body to a public official serving that public body, of expenses incurred in the conduct of
6 official duties on behalf of the public body. Any such repayment must comply with any
7 applicable laws and policies governing the eligibility of such repayment. [OAR 199-008-
8 0005(4)].

9
10 ORS 198.190 authorizes the "governing body" of a special district to provide
11 "reimbursement of a member for actual and reasonable traveling and other expenses
12 necessarily incurred by a member in performing official duties." The District could
13 choose to implement this statutory authority through adoption of a Board policy.
14 Alternatively, each individual member, after traveling, could submit their request for
15 reimbursement to the Board (after declaring an actual conflict) and have the Board vote
16 on the reimbursement request from that individual member. It does not appear that the
17 Board has a Board travel policy that applies to Board Members. The CWS travel policy
18 appears to only apply to *employees*.

19
20 The Washington County travel policy states that County officials, including elected
21 officials, are subject to the policy while traveling on County business; however, when
22 Kathryn Harrington traveled to conferences and events examined in this preliminary
23 review, it appears that she was traveling on CWS business, not County business.
24 Therefore, it does not appear that County policy applies to her CWS travel. As a special
25 district under Oregon law, CWS is a separate legal entity from the County, with its own
26 governing body. Therefore, it appears only the CWS policies apply when CWS Board
27 Members are traveling on CWS business.

28
29 It appears CWS does not have a travel policy applicable to Board Members, does not
30 have compensation agreements with the Board Members, nor does CWS compensate
31 Board Members directly for their Board service. If this case moves to investigation, the
32 Commission would need to determine whether Kathryn Harrington was authorized to be

1 reimbursed for travel under OAR 199-008-0005(4) which requires “[a]ny such
2 repayment [of expenses] must comply with any applicable laws and policies governing
3 the eligibility of such repayment.” In this instance, ORS 198.190 authorizes the
4 “governing body” that is the Board to authorize reimbursement of expenses for CWS
5 Board Members. Given that it does not appear the Board adopted a travel policy
6 applicable to Board Directors, nor does it appear that Kathryn Harrington presented her
7 requests for reimbursement to the Board to be approved, it appears Kathryn Harrington
8 may have used her position to gain a financial benefit without authorization by law.
9 Given the unknown nature of the reimbursement process, additional information is
10 needed to determine if Kathryn Harrington used her official position to gain
11 reimbursement of expenses without legal authority from the Board.

12
13 The information available in this preliminary review indicates that Kathryn Harrington
14 traveled on behalf of CWS, in her role as CWS Board Chair on several occasions. Her
15 CWS travel included trips to Copenhagen, Denmark in 2022, Singapore and Vientiane,
16 Laos in 2023, and Buffalo, New York in 2024. Kathryn Harrington’s travel to Singapore
17 and Laos was sponsored and paid for by US Water Partnership, not CWS. Generally, it
18 appears that Kathryn Harrington stayed at standard hotel rooms at designated
19 event/conference hotels when she traveled on CWS business. When asked about her
20 room preference while attending the 2024 NACWA Conference in Buffalo, Kathryn
21 Harrington requested a “simple” room, “any size.” It also appears that CWS may have
22 received a discounted group rate for her hotel on at least one occasion. The information
23 does not appear to indicate that Kathryn Harrington used her position to dine at
24 extravagant restaurants paid for by CWS, nor does the information indicate that she
25 received unauthorized gifts.

26
27 For her trips to Copenhagen in 2023 and Buffalo in 2024, Kathryn Harrington purchased
28 her own economy plane tickets and submitted for reimbursement from CWS.
29 For both the Buffalo and Copenhagen trips, Kathryn Harrington included her personal
30 frequent flyer number when she purchased the tickets. The information in this
31 preliminary review indicates that Kathryn Harrington may have earned the personal
32 benefit of frequent flyer rewards when she booked the CWS travel. Frequent flyer

1 rewards do not appear to be included in Kathryn Harrington's official compensation
2 package. Because the information appears to indicate that Kathryn Harrington received
3 the personal benefit of frequent flyer awards when she booked flights for CWS
4 business, it appears that she may have received a financial benefit which would not
5 have been available to her but for her holding her official position. Thus, it appears that
6 she may have violated ORS 244.040(1).

7
8 The information also indicates that Kathryn Harrington may have used her position to
9 add personal business to her CWS trips. Specifically, she extended her 2022 stay in
10 Copenhagen by three days, and she extended her 2024 stay in Buffalo by seven days,
11 for personal business. CWS paid for Kathryn Harrington's round trip flights to
12 Copenhagen and Buffalo. Kathryn Harrington submitted for reimbursements for both of
13 her flights. The information indicates that for the return flight from Buffalo, Kathryn
14 Harrington compared the difference in flights costs for her extended stay, and because
15 her flight home cost more than it would have otherwise, she requested reimbursement
16 only for the lower cost of the original flight.

17
18 Although it appears that Kathryn Harrington paid the additional expenses incurred by
19 extending her CWS trips for personal business, by combining her personal travel with
20 CWS travel, she may have avoided a financial detriment of needing to separately
21 purchase her own flights from Portland to Buffalo and Copenhagen. As noted above,
22 CWS does not appear to have a travel policy for Board Directors, and as such, the
23 benefit of authorized extended stays for CWS travel does not appear to be included in
24 Kathryn Harrington's official compensation package. The concern raised by extended
25 stays is that unless there is a travel policy that permits such extensions, a public official
26 who does so could be engaging in a prohibited use of office.

27
28 Based on the information available, it appears that Kathryn Harrington may have used
29 her official position as the CWS Member and Board Chair to obtain a personal financial
30 benefit or avoidance of financial detriment when she extended her CWS travel for
31 personal business and when she earned frequent flyer rewards on flights for CWS
32 business. Because those benefits were not included in her official compensation

1 package, it appears that she may have violated ORS 244.040(1).

3 Conflict of Interest

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

9
10 When met with a conflict of interest, an elected public official, such as Kathryn
11 Harrington, must make a public announcement of the nature of the conflict of interest. If
12 met with a potential conflict of interest, this announcement must be made prior to taking
13 any action on the matter in the capacity of a public official. If met with an actual conflict
14 of interest, the public official must make the public announcement and then refrain from
15 participating as a public official in any discussion, debate or vote on the matter out of
16 which the actual conflict of interest arises, unless their vote is necessary to meet a
17 minimum vote requirement, in which case the public official may vote but may not
18 participate in any discussion or debate on the matter. [ORS 244.120(2)].

19
20 As noted above, it appears that Kathryn Harrington, acting in her role as CWS Board
21 Chair, traveled to Copenhagen, Denmark in 2022, Singapore and Vientiane, Laos in
22 2023, and Buffalo, New York in 2024. It appears that Kathryn Harrington may have
23 included her personal frequent flyer number to earn traveler rewards when she booked
24 flights for CWS business in Copenhagen and Buffalo. It also appears that she extended
25 both of these trips for personal business. In doing so, Kathryn Harrington received a
26 private financial benefit. The information does not indicate that Kathryn Harrington
27 disclosed her conflicts of interest. Thus, it appears that Kathryn Harrington may have
28 failed to comply with the conflict of interest requirements in ORS 244.120(2). As noted
29 above, ORS 198.190 authorizes “the governing body” of CWS to choose to reimburse
30 members for reasonable travel. Given the unknown nature of the reimbursement
31 process, additional information is needed to determine if Kathryn Harrington properly
32 disclosed any conflicts of interest when seeking reimbursement.

1 Statements of Economic Interest

2 As the At-Large Chair for the Washington County Board of County Commissioners,
3 Kathryn Harrington is required to file annual Statements of Economic Interest (SEIs).
4 ORS 244.050(2) directs public officials who are required to file annual SEIs to do so by
5 April 15th of each year, and those SEIs must include the information required under
6 ORS 244.060, 244.070 and 244.090.

7
8 In pertinent part, ORS 244.060 includes the following information in the requirements for
9 SEIs:

10
11 (5) All expenses with an aggregate value exceeding \$50 received by the public
12 official during the preceding calendar year when participating in a convention,
13 mission, trip or other meeting described in ORS 244.020 (7)(b)(F), including the
14 name and address of the organization, unit of government, tribe or corporation
15 paying the expenses, the nature of the event and the date and amount of the
16 expense.

17
18 Kathryn Harrington submitted her 2024 SEI on April 9, 2024. On Section 4 of her SEI,
19 she reported that she received paid expenses from US Water Partnership for an office
20 related event - an international water utilities conference on June 3, 2023. The filed SEI
21 did not list the amount of the expenses she received. Thus, information in this report
22 appears to indicate that Kathryn Harrington may have failed to report required
23 information on her 2024 SEI. We note that Kathryn Harrington has already amended her
24 2024 SEI filing to now include this information. Nonetheless, there appears to be a
25 substantial objective basis to believe that Kathryn Harrington may have filed her 2024
26 SEI without the information required in ORS 244.060(5).

27
28 Based on the information available in this preliminary review, there appears to be a
29 substantial, objective basis to believe that Kathryn Harrington may have violated the
30 prohibited use of office provisions, the conflict of interest provisions, and the SEI
31 provisions in Oregon Government Ethics Law.

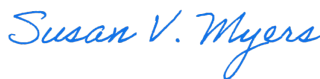
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1 The Oregon Government Ethics Commission should move to investigate whether
2 Kathryn Harrington may have violated ORS 244.040(1) ORS 244.060(5), and ORS
3 244.120(2). (Motion 4).

4
5 **ASSOCIATED DOCUMENTS:**

6 #PR1 Original Complaint received 6/24/2025
7 #PR2 Clean Water Services Board of Directors accessed 7/8/2025
8 #PR3 Kathryn Harrington Response received 7/17/2025
9 #PR4 Travel Reconciliation Form submitted 10/6/2022
10 #PR5 Copenhagen Flight Receipt dated 6/13/2022
11 #PR6 Copenhagen Itinerary reviewed 7/30/2025
12 #PR7 Kathryn Harrington Email on 10/5/2022
13 #PR8 Singapore Laos Itinerary reviewed 7/30/2025
14 #PR9 Singapore International Water Week Instructions accessed 7/30/2025
15 #PR10 Harrington Singapore Laos Flights accessed 7/31/2025
16 #PR11 CWS Travel Request Form dated 2/22/2023
17 #PR12 Kathryn Harrington SEI Document Attached on 4/9/2024
18 #PR13 Kathryn Harrington SEI 2024
19 #PR14 Travel Reconciliation Form with Receipts dated 9/18/2024
20 #PR15 PCard Expenses for Fiscal Year 2022
21 #PR16 PCard Expenses for Fiscal Year 2023
22 #PR17 Harrington P-Card Expenses compiled 7/30/2025
23 #PR18 Travel Policy effective 3/1/2012
24 #PR19 Washington County Travel Policy amended 5/18/2021
25 #PR20 Memo of Phone Call with Tanya Ange on 8/6/2025
26 #PR21 Amended 2024 SEI on 8/5/2025
27 #PR22 Email from Kathryn Harrington on 8/7/2025

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REVIEWED BY *Sean T. Brady*, Senior Assistant Attorney General Authorized on 8/21/2025