

OREGON GOVERNMENT ETHICS COMMISSION

PRELIMINARY REVIEW

CASE NO: 25-355EJS

DATE: August 21, 2025

RESPONDENT: TREECE, Pam, Member, Board of Directors, Clean Water Services

COMPLAINANT: KNUDSEN, Dirk

RECOMMENDED ACTION: Move to Investigate Possible Violations of ORS 244.040(1) 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 Pam Treece, Member of the Board of Directors (Board) for Clean Water Services and Vice-Chair for the Washington County Board of Commissioners, 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 Pam Treece. Pam Treece 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. Pam Treece has served as a CWS Board Member since 2019. (#PR2).

Complaint

The complaint states that CWS has about 600,000 consumers in Washington County,

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

6
7 In the complaint, Dirk Knudsen states that Pam Treece, as a Board Member for CWS,
8 travelled on behalf of CWS and accepted unauthorized travel benefits from CWS. The
9 complaint states that Pam Treece may have traveled domestically and internationally for
10 CWS, including travel to:

- 11
- 12 • Copenhagen, Denmark - for the 2022 International Water Association (IWA)
13 Congress
 - 14 • Toronto, Canada - for the 2024 IWA Congress
 - 15 • Vientiane, Laos - to close out a multi-year “utility partnership”
 - 16 • Singapore - for Singapore International Water Week
 - 17 • New Orleans - for a Water Environment Federation's Technical Exhibition and
18 Conference (WEFTEC) (#PR1).
- 19

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

25
26 The complaint states that CWS Board Members, who also serve as Washington County
27 Commissioners, may have been required to follow Washington County rules and
28 policies on travel and spending, and it alleges that the Board Members may have
29 exceeded the allowances provided by both CWS and Washington County policies,
30 rules, and procedures. (#PR1).

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1 Response

2 Pam Treece provided Commission staff with a written response to the complaint. In the
3 response dated July 18, 2025, Pam Treece provides information related to her domestic
4 and international travel on behalf of CWS and her participation in the various
5 conferences she attended. She also provided receipts and travel expense records for
6 her CWS travel. (#PR3).

7
8 2022 Copenhagen - IWA Conference

9 Pam Treece states that she traveled to Copenhagen to attend the 2022 International
10 Water Association Conference which focused on innovative water management and
11 treatment. (#PR3).

12
13 The invoice for the AC Bella Sky Hotel indicates that Pam Treece stayed in a “Standard
14 Room” at the IWA Conference hotel, the AC Bella Sky Hotel, for seven nights. The
15 records indicate that Pam Treece purchased, and was later reimbursed by CWS for, a
16 round trip “economy standard” flight to Copenhagen on Icelandic Air, departing
17 September 9, 2022 and returning September 19, 2022. The airline invoice also indicates
18 that she may have earned frequent flyer “Saga Points” when she booked her flights as
19 an Icelandair member. (#PR4).

20
21 In her response, Pam Treece explains that she extended her trip two extra nights at her
22 own personal expense. The records provided indicate that CWS paid \$1,273.30 for
23 seven nights at the AC Bella Sky Hotel, and Pam Treece paid \$364.13 for the two extra
24 nights. The records also indicate that Pam Treece was reimbursed for her base airfare
25 rate of \$1122.07, and she personally paid \$227 in flight add-ons. (#PR3, #PR4).

26
27 2023 Washington D.C. - National Water Policy Fly-In

28 Pam Treece states that she attended the 2023 National Water Policy Fly-In (Fly-In) in
29 Washington D.C. to advocate for key issues that impact CWS. She explains that CWS
30 officials attending the Fly-In stayed at the Hilton hotel where conference events were
31 held. (#PR3).

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1 The records indicate that Pam Treece flew "Coach" on Alaska Airlines, departing April
2 20, 2023 and returning April 27, 2023. The airline invoice indicates that Pam Treece
3 included her personal frequent flyer mileage number, for rewards, when she booked the
4 flight. It appears that CWS reimbursed Pam Treece \$817.80 for her flight, and Pam
5 Treece personally paid \$286.98 for a seat upgrade. The records for this trip also
6 indicate that CWS paid for Pam Treece's Amtrak ticket, an Uber from the Airport, and
7 four full days' per diem. (#PR5).

8
9 The records indicate that Pam Treece arrived in Newark, NJ on April 20, 2023, and she
10 took an Amtrak train to Washington, D.C. on April 24, 2023. The information indicates
11 that the Fly-In was scheduled for April 25-26th. It appears that Pam Treece extended
12 her travel by three days for personal business in Newark. CWS reimbursed Pam Treece
13 \$817.80 for her flight and \$185.00 for her Acela Business Class Amtrak ticket. (#PR5).

14
15 Acela is Amtrak's premium high-speed train service available for travel between
16 Newark, NJ and Washington, D.C. This trip on an Acela train takes approximately two
17 hours and 40 minutes, while a standard Amtrak train takes approximately three hours
18 and 17 minutes. Coach seats are not offered on Acela trains, and the price of the
19 cheapest tickets (Business Class) are approximately double the price of the cheapest
20 tickets (Coach) on a standard Amtrak train. (#PR17).

21
22 Email records indicate that CWS staff compared the difference between the cost for
23 another CWS official's flight to Washington D.C. with the combined cost of Pam
24 Treece's flight to Newark, NJ and her Amtrak to Washington D.C. It appears that CWS
25 staff determined that Pam Treece could be reimbursed for the flight and the Amtrak
26 ticket, as long as the cost did not exceed the price of the other CWS official's flight.
27 (#PR18).

28 29 2024 New Orleans - WEFTEC

30 Pam Treece states that she attended the 2024 Water Environment Federation's
31 Technical Exhibition and Conference (WEFTEC) in New Orleans in her role as a CWS
32 Board Member. (#PR3).

1
2 Pam Treece, along with other CWS officials, stayed at the Omni Riverfront Hotel in New
3 Orleans. The itinerary for the October 5-9, 2024 WEFTEC indicates that the Omni
4 Riverfront Hotel was one of the designated conference hotels with shuttles to the
5 convention center. (#PR6).

6
7 The receipt for Pam Treece's round-trip flight to New Orleans indicates that CWS
8 booked her an "economy" flight on American Airlines. The Travel/Training Reconciliation
9 Form dated November 12, 2024 indicates that Pam Treece was reimbursed for Ubers to
10 and from the airport, and she was paid per diem for meals and incidental expenses
11 based on the GSA rate for FY2025. (#PR7).

12 13 2024 Toronto - IWA Conference

14 Pam Treece states that she traveled to Toronto to attend the 2024 IWA Conference
15 along with other CWS staff. She states that she flew to Toronto on Alaska Airlines in
16 economy, and stayed at the conference hotel, the Toronto Marriott. Pam Treece explains
17 that she extended her trip to spend several days in Newark, New Jersey. She states
18 that she flew from Toronto to Newark at her own expense, and CWS paid for her flight
19 home from Newark. (#PR3).

20
21 Pam Treece's flight itinerary indicates that she booked a \$503.46 economy Alaska
22 Airlines ticket and was placed on a waiting list for First/Business Class seats. The
23 records indicate that CWS reimbursed Pam Treece for her flight and paid \$36.50 for
24 flight cancellation insurance. The records also indicate that Pam Treece included her
25 Alaska Airlines travel rewards number when she booked her round-trip flight to Toronto.
26 (#PR8).

27
28 The IWA conference itinerary indicates that the Toronto Marriott hotel is approximately a
29 10-minute walk to the convention center, and the hotel invoice indicates that CWS may
30 have received a group rate on the room reserved. The conference itinerary also
31 identifies two restaurant reservations for CWS attendees' meals: Jump Restaurant and
32 Evviva. The Travel/Training Reconciliation Form submitted by Pam Treece on

1 September 17, 2024 indicates that she received per diem, at the GSA rate for the area,
2 for days/times when meals were not provided by CWS. (#PR8, #PR9).

3
4 2024 Vientiane, Laos and Singapore - International Water Week

5 Pam Treece states that she participated in the 2024 CWS trip to Vientiane, Laos and
6 Singapore to attend the Singapore International Water Week (SIWW) and meetings with
7 Vientiane City Office for Management and Services. She states that this trip was in
8 connection with the WiSE Water Smart Engagements program as a part of the US-
9 ASEAN Smart Cities Partnership. Pam Treece states that, as part of this partnership,
10 the expenses for two of the CWS team were paid for by Global Ties US (Jack Liang and
11 Peter Schauer) and the expenses for two of the CWS team were paid for by CWS (Pam
12 Treece and Jared Kinnear). (#PR3).

13
14 In Singapore, Pam Treece stayed at the VOCO Orchard Hotel from June 16, 2024 until
15 June 22, 2024. In Vientiane, Laos, Pam Treece stayed at the IHG Crowne Plaza Hotel
16 in a "best flexible" room until she returned home on June 26, 2024. The records for Pam
17 Treece's flights indicate that she purchased, and was reimbursed for, "economy" tickets.
18 (#PR10).

19
20 The information indicates that CWS paid Pam Treece for 13 days partial meal per diem
21 based on the GSA rate for the countries, for a total of \$604.00. The information also
22 indicates that Pam Treece was reimbursed for Ubers, taxis, and travel immunizations
23 for the trip. (#PR10).

24
25 General Expenses

26 CWS provided multiple spreadsheets of general expenses for the 2021, 2022, 2023, and
27 2024 fiscal years. Based on the information in the spreadsheets, CWS appears to have
28 paid for several of Pam Treece's meals from 2021-2023. (#PR11, #PR12, #PR13).

29
30 CWS Travel Policy

31 Commission staff reviewed the CWS Travel Policy, which became effective March 1,
32 2012. Based on the information obtained by Commission staff, this travel policy appears

1 to be the travel policy in effect for all times relevant to this preliminary review. The CWS
2 travel policy states, “It is the District’s intent to reimburse *employees* for reasonable,
3 ordinary, and necessary business expenses incurred when traveling on behalf of the
4 District, in accordance with this Policy.” [emphasis added.] Although the CWS travel
5 policy appears to specifically address employee travel, it does not appear to apply to
6 Board Members’ travel. (#PR14).

7 8 Washington County Travel Policy

9 Washington County Policy 402 - Travel and Business Expense, amended on May 18,
10 2021, states that the policy applies to anyone traveling on County business unless
11 otherwise directed by contract. The policy further clarifies that the elected officials are
12 employees of the County for income tax purposes and, for this reason, are subject to this
13 policy. The policy states that travel and business expenses must be “reasonable and
14 necessary.” It states that individuals traveling on County business are expected to be
15 prudent and only incur costs they normally would incur if traveling at their own expense,
16 and expenses solely for the benefit of an individual are not allowable. (#PR15).

17 18 Tanya Ange Phone Call

19 On August 6, 2025 Commission staff spoke with Tanya Ange, County Administrator for
20 Washington County. Tanya Ange explained that CWS used to be a component unit of
21 Washington County, but CWS has since separated from Washington County. She
22 explained that, although the same individuals serve both governing bodies, they function
23 as separate entities with their own organizational structures and policies. (#PR16).

24
25 Tanya Ange explained that Washington County Commissioners need to apply for
26 approval of County training and travel through the County Administrative Office to ensure
27 that there are funds available in the budget for their travel, and to ensure that it is within
28 policy. She explained that the County is not responsible for reviewing CWS travel. She
29 stated that, when on County business, the Commissioners are subject to County policy,
30 and when on CWS business, they are subject to CWS policy. (#PR16).

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1 Statutory Authority

2 ORS 198.190 allows for special districts, including CWS, to provide compensation of up
3 to \$50 per day to its Board Members. Additionally, ORS 198.190 authorizes “[t]he
4 governing body may provide reimbursement of a member for actual and reasonable
5 traveling and other expenses necessarily incurred by a member in performing official
6 duties.” In this instance, the CWS Board of Directors is the “governing body.”
7

8 **RECOMMENDATION:** Pam Treece is a Board Member for Clean Water Services and
9 has held that position since 2019. As such, she is a public official, as defined in ORS
10 244.020(15), and therefore subject to Oregon Government Ethics Law.
11

12 Use of Office

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

24 The term “official compensation package” is defined as the wages and other benefits
25 provided to a public official. To be part of a public official’s “official compensation
26 package,” the wages and benefits must have been specifically approved by the public
27 body in a formal manner, such as through a union contract, an employment contract, or
28 other adopted personnel policies that apply generally to employees or other public
29 officials. The term also includes the direct payment of a public official’s expenses by the
30 public body, in accordance with the public body’s policies. [OAR 199-008-0005(3)].
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1 The term “reimbursement of expenses” is defined to mean the payment by a public
2 body to a public official serving that public body, of expenses incurred in the conduct of
3 official duties on behalf of the public body. Any such repayment must comply with any
4 applicable laws and policies governing the eligibility of such repayment. [OAR 199-008-
5 0005(4)].

6
7 ORS 198.190 authorizes the “governing body” of a special district to provide
8 “reimbursement of a member for actual and reasonable traveling and other expenses
9 necessarily incurred by a member in performing official duties.” CWS could choose to
10 implement this statutory authority through adoption of a Board policy. Alternatively, each
11 individual member, after traveling, could submit their request for reimbursement to the
12 Board (after declaring an actual conflict) and have the Board vote on the reimbursement
13 request from that individual member. It does not appear that the Board has a Board
14 travel policy that applies to Board Members. The CWS travel policy appears to only
15 apply to employees

16
17 The Washington County travel policy states that County officials, including elected
18 officials, are subject to the policy while traveling on County business; however, when
19 Pam Treece traveled to conferences and events examined in this preliminary review, it
20 appears that she was traveling on CWS business, not County business. Therefore, it
21 does not appear that County policy applies to her CWS travel. As a special district
22 under Oregon law, CWS is a separate legal entity from the County, with its own
23 governing body. Therefore, it appears only the CWS policies apply when CWS Board
24 Members are traveling on CWS business.

25
26 It appears CWS does not have a travel policy applicable to Board Members, does not
27 have compensation agreements with the Board Members, nor does CWS compensate
28 Board Members directly for their Board service. If this case moves to investigation, the
29 Commission will need to determine whether Pam Treece was authorized to be
30 reimbursed for travel under OAR 199-008-0005(4) which requires “[a]ny such
31 repayment [of expenses] must comply with any applicable laws and policies governing
32 the eligibility of such repayment.” In this instance ORS 198.190 authorizes the

1 “governing body” that is the Board to authorize reimbursement of expenses for CWS
2 Board Members. Given that it does not appear the Board adopted a travel policy
3 applicable to Board Directors, nor does it appear that Pam Treece presented her
4 requests for reimbursement to the Board to be approved, it appears Pam Treece may
5 have used her position to gain a financial benefit without authorization by law. Given the
6 unknown nature of the reimbursement process, additional information is needed to
7 determine if Pam Treece used her official position to gain reimbursement of expenses
8 without legal authority from the Board.

9
10 The information available in this preliminary review indicates that Pam Treece traveled
11 on behalf of CWS, in her role as CWS Board Director on several occasions. Her CWS
12 travel included trips to Copenhagen, Denmark in 2022, Washington, D.C. in 2023, New
13 Orleans, Louisiana in 2024, Singapore and Laos in 2024, and Toronto, Canada in 2024.
14 The information indicates that when Pam Treece traveled to various conferences and
15 events in these locations, she flew on economy flights. It appears that, on several
16 occasions, Pam Treece booked her own flights for CWS business, and when she did,
17 she included her personal frequent flyer numbers on the reservations to obtain frequent
18 flyer rewards. Frequent flyer rewards do not appear to be authorized in Pam Treece’s CWS
19 official compensation package. Because the information appears to indicate that Pam
20 Treece received the personal benefit of frequent flyer rewards when she booked flights
21 for CWS business, it appears that she may have received a financial benefit which
22 would not have been available to her but for her official position. Thus, it appears that
23 she may have violated ORS 244.040(1).

24
25 The information also indicates that Pam Treece may have used her position to add
26 personal business to her CWS trips. Specifically, she extended her stays in
27 Copenhagen and Washington D.C., and Toronto. By extending her travel stay, rather
28 than booking a separate trip herself, she could be avoiding the financial detriment of
29 having to pay for their own personal travel expenses between Portland and her
30 destinations.

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1 Generally, it appears that Pam Treece stayed at standard hotel rooms at designated
2 event hotels when she traveled on CWS business. It also appears that CWS may have
3 received a discounted group rate for her hotel on at least one occasion. The information
4 does not appear to indicate that Pam Treece used her position to dine at extravagant
5 restaurants paid for by CWS, nor does the information indicate that she received
6 unauthorized gifts.

7
8 When Pam Treece traveled to Washington, D.C. for the Fly-In event, she arrived in
9 Newark, NJ on April 20, 2023, and she took an Amtrak train to Washington, D.C. on
10 April 24, 2023. The Fly-In was scheduled to begin on April 25th, and it appears that
11 Pam Treece spent several days in New Jersey for personal business prior to the event.
12 CWS reimbursed Pam Treece \$817.80 for her flights and \$185.00 for her Acela
13 Business Class Amtrak ticket. As noted above, CWS does not appear to have a travel
14 policy for Board Members, and as such, the benefit of extended stays for CWS travel
15 does not appear to be included in Pam Treece's official compensation package. ORS
16 244.040(2)(c) provides that public officials can accept reimbursement of expenses, but
17 those expenses must have been incurred while performing official duties on behalf of
18 the public body. It appears Pam Treece was reimbursed by CWS for the cost of flights
19 and an Amtrak ticket related to personal business and which was not unaffiliated with
20 her CWS business trips. Therefore, it appears Pam Treece may have used her official
21 position to receive reimbursement for the costs of personal business expenses.

22
23 Based on the information available, it appears that Pam Treece may have used her
24 official position as a CWS Board Member to obtain a personal financial benefit or
25 avoidance of financial detriment when she extended her CWS travel for personal
26 business and when she earned frequent flyer rewards on flights for CWS business.
27 Because those benefits were not included in her official compensation package, it
28 appears that she may have violated ORS 244.040(1).

29 30 Conflict of Interest

31 A conflict of interest means any action, decision, or recommendation by a person acting
32 in their capacity as a public official, the effect of which would be (actual conflict of

1 interest) or could be (potential conflict of interest) to the private financial benefit or
2 detriment of the person, their relative, or a business with which they or their relative are
3 associated. [ORS 244.020(1) and ORS 244.020(13)].
4

5 When met with a conflict of interest, an elected public official, such as Pam Treece,
6 must make a public announcement of the nature of the conflict of interest. If met with a
7 potential conflict of interest, this announcement must be made prior to taking any action
8 on the matter in the capacity of a public official. If met with an actual conflict of interest,
9 the public official must make the public announcement and then refrain from
10 participating as a public official in any discussion, debate or vote on the matter out of
11 which the actual conflict of interest arises, unless their vote is necessary to meet a
12 minimum vote requirement, in which case the public official may vote but may not
13 participate in any discussion or debate on the matter. [ORS 244.120(2)]. As noted
14 above, ORS 198.190 authorizes “the governing body” of CWS to choose to reimburse
15 members for reasonable travel. Given the unknown nature of the reimbursement
16 process, additional information is needed to determine if Pam Treece properly disclosed
17 conflicts of interest when seeking reimbursement.
18

19 As noted above, it appears that Pam Treece, acting in her role as a CWS Board
20 Member, traveled to Copenhagen, Denmark in 2022, Washington, D.C. in 2023, New
21 Orleans, Louisiana in 2024, Singapore and Laos in 2024, and Toronto, Canada in 2024
22 for CWS business. It appears that Pam Treece extended several of these trips for
23 personal business. For the Washington D.C. trip, it appears that Pam Treece flew into
24 Newark, NJ, instead of Washington D.C. to spend three days in New Jersey before the
25 Fly In. It appears that Pam Treece purchased and was reimbursed by CWS for a
26 \$185.00 premium Amtrak train ticket from Newark, NJ to Washington D.C. on April 24,
27 2025. It also appears that Pam Treece may have included her personal frequent flyer
28 number to earn traveler rewards when she booked flights for CWS business. The
29 information does not indicate that Pam Treece disclosed her conflicts of interest. Thus,
30 it appears that Pam Treece may have failed to comply with the conflict of interest
31 disclosure requirements in ORS 244.120(2).
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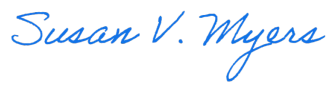
1 Based on the information available in this preliminary review, there appears to be a
2 substantial, objective basis to believe that Pam Treece may have violated the prohibited
3 use of office provisions and the conflict of interest provisions in Oregon Government
4 Ethics Law.

5
6 The Government Ethics Commission should move to investigate whether Pam Treece
7 may have violated ORS 244.040(1) and ORS 244.120(2). (Motion 4).
8

9 **ASSOCIATED DOCUMENTS:**

10 #PR1 Original Complaint received 6/24/2025
11 #PR2 Clean Water Services Board of Directors accessed 7/8/2025
12 #PR3 Pam Treece Response dated 7/18/2025
13 #PR4 Copenhagen Travel Documents received 7/18/2025
14 #PR5 Pam Treece Travel Reconciliation Form and Receipts submitted 5/26/2023
15 #PR6 New Orleans WEFTEC Information accessed 7/31/2025
16 #PR7 WEFTEC Travel Reconciliation Form dated 11/12/2024
17 #PR8 IWA Toronto Conference Itinerary for 8/11/2024
18 #PR9 Pam Treece Travel Reconciliation Form and Receipts submitted 9/17/2024
19 #PR10 Singapore Laos Travel Reconciliation Form dated 7/31/2024
20 #PR11 PCard Expenses for Fiscal Year 2022
21 #PR12 PCard Expenses for Fiscal Year 2023
22 #PR13 Treece P-Card Expenses compiled 7/30/2025
23 #PR14 Travel Policy effective 3/1/12
24 #PR15 Washington County Travel Policy amended 5/18/2021
25 #PR16 Memo of Phone Call with Tanya Ange on 8/6/2025
26 #PR17 Amtrak NJ to DC Search on 8/4/2025
27 #PR18 Email from Pam Treece on 8/7/2025

PREPARED BY *Joshua J. Sullivan*, Investigator  8/21/2025

APPROVED BY *Susan V. Myers*, Executive Director  8/21/2025

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