

BEFORE THE OREGON GOVERNMENT ETHICS COMMISSION

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

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

2. JURISDICTION:

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

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

3. APPLICABLE LAW:

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

recommendation the effect of which would be (actual conflict of interest) or could be (potential conflict of interest) to the private financial benefit or detriment of the public official, their relative, or any business with which they are associated. [ORS 244.020(1) and (13)].

- B. When met with a conflict of interest, an elected public official, such as Pam Treece, must announce publicly the nature of the conflict of interest. If met with a potential conflict of interest, this announcement must be made prior to taking any action on the matter in the capacity of a public official. If met with an actual conflict of interest, the public official must refrain from participating as a public official in any discussion, debate or vote on the matter out of which the actual conflict of interest arises, unless their vote is necessary to meet a minimum vote requirement, in which case the public official may vote but may not participate in any discussion or debate on the matter. [ORS 244.120(2)].
- C. ORS 244.040(1) prohibits a public official from using or attempting to use their official position or office to obtain a financial gain or avoid a financial detriment for themselves, their relatives or household members, or any business with which they or their relatives or household members are associated, if the financial gain or avoidance of financial detriment would not otherwise be available but for the public official's holding their official position or office.
- D. OAR 199-008-0005(3) states that "[t]he term "official compensation package" means the wages and other benefits provided to the public official. To be part of the public official's "official compensation package", the wages and benefits must have been

specifically approved by the public body in a formal manner, such as through a union contract, an employment contract, or other adopted personnel policies that apply generally to employees or other public officials. "Official compensation package" also includes the direct payment of a public official's expenses by the public body, in accordance with the public body's policies."

4. STIPULATED FACTS

- A. Clean Water Services is a special district that serves as a separately managed and financed public utility in Washington County. The CWS Board of Directors is made up of five elected officials, who also serve as Washington County Commissioners. Pam Treece has served as a CWS Board Member since 2019.
- B. In her role as a Board Member for CWS, Pam Treece traveled to Copenhagen, Denmark in 2022; Washington D.C. in 2023; New Orleans, Louisiana; Toronto, Canada; Vientiane, Laos and Singapore in 2024. The preliminary review in this case identified that, for each of these trips, Pam Treece earned travel rewards in the form of frequent flyer miles. Information provided by CWS indicates that personal travel rewards earned while traveling on official CWS business are included in Board Members' official compensation packages. Therefore, it appears that the benefit of personal frequent flyer rewards obtained by Pam Treece while traveling on official CWS business were included in her official compensation package and would not constitute a violation of ORS 244.040(1).

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

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

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

5. CONCLUSIONS OF LAW

- A. The actions described in paragraphs 4(C) and (D) constitute one violation of ORS 244.040(1) with one equivalent action, and the actions described in paragraphs 4(C), (D), and (F) constitute one violation of ORS 244.120(2) with one equivalent action.
- B. The results of the Commission investigation, if submitted through exhibits and testimony at a contested case hearing, would establish a preponderance of evidence in support of a post-hearing order to

find one violation of ORS 244.040(1) with one equivalent action and violation of ORS 244.120(2) with one equivalent action.

6. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. Pam Treece has indicated that she wishes to conclude this matter by agreeing to the terms and conditions in this stipulated final order without completing the investigative phase.
- B. In lieu of a civil penalty, Pam Treece will receive a letter of education, as authorized by ORS 244.350(5), in order to settle and compromise this matter.
- C. The Commission releases, settles and compromises any and all claims, allegations and charges which have been asserted by the Commission in the above-referenced case against Pam Treece.
- D. Pam Treece will initiate no claims, litigation or other action against the Commission as a result of these proceedings.

6. REVIEW BY COUNSEL:

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

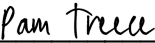
7. EFFECT:

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

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

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

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

Signed by:

Respondent: Pam Treece

February 24, 2026

Date

Signed by:

Shenóa Payne, Chairperson
Oregon Government Ethics Commission

March 9, 2026

Date