



Oregon Senate Fact-Finding Mission Application & Approval Form

This application will be used to review and officially approve fact-finding missions allowed under ORS 244.020(7)(b)(H)(i) and required to be reported under ORS 244.060(6) **if the expense per member is estimated to exceed \$50**. This application must be submitted to the Secretary of the Senate **no later than 14 days** before the start of the fact-finding mission unless, as determined by the secretary, good cause exists for submitting the application after the deadline. **To promote transparency, all approved applications and accompanying materials will be posted on the Secretary of the Senate's website.**

Description of mission: Google State Policy Summit

Issue(s) or legislation related to mission: AI, privacy, online safety, and energy

Location of mission: Chicago

Date(s) of mission: October 20-22, 2025

Person/entity paying expenses: Google

Address of person/entity paying expenses: 320 N Morgan St. Chicago, IL

Invited members (select one):

☐ All senators ☒ The following senators: Brock Smith, Prozanski

☐ All senators on the Committee(s)/Task Force(s) on: _____

Staff invited: ☐ Yes ☒ No Relatives/household members invited: ☐ Yes ☒ No

Activities will be limited to a factual investigation or other educational purposes: ☒ I agree.

The mission is not being conducted for campaign or partisan political purposes: ☒ I agree.

Please include the following required attachments with this application:

1. Written opinion from the Oregon Government Ethics Commission concluding that the event is a permitted fact-finding mission under ORS 244.020(7)(b)(H)(i) and the rules of the commission.
2. Written itinerary or agenda for all scheduled meetings, events, presenters, meals, travel, lodging, or other activities planned during the mission.

Within thirty (30) days after completion of the mission, please submit the following required documents to the Secretary of the Senate, which will be posted on the secretary's website:

1. An attendance sheet listing all senators, staff, relatives, household members, lobbyists, and all others who participated in the mission.
2. The aggregate value of food, travel, and lodging expenses provided to each senator, staff member, relative, and household member of the senator. The aggregate value of expenses for each person shall be determined in the same manner as required by the Oregon Government Ethics Commission for disclosure on a Statement of Economic Interest under ORS 244.060(6).
3. Written confirmation that the mission was conducted substantially according to the itinerary or agenda submitted with the application and, if the mission varied materially from the submitted itinerary or agenda, a written account describing the material variations (i.e., any additional meetings, events, presenters, meals, travel, lodging).

Failure to submit this information within thirty (30) days after completion of the mission will result in an automatic denial of all future applications submitted by the applicant signing below and the person or entity listed above as paying expenses.

By signing below, I hereby declare that all information submitted at any time by me, or on my behalf, to the Oregon Senate in connection with this application and fact-finding mission is correct to the best of my knowledge and belief.

Signature of applicant:  Date: 9/23/2025

Name of applicant (print): Phil Donovan

Address: 11481 SW Hall Blvd Suite 201-N, Tigard, OR 97223

Telephone number: 503-522-3023

E-mail address: phil@nwpublicaffairs.com

All information above is required for the application to be considered.

For Official Use Only

Based on the written conclusion of the Oregon Government Ethics Commission and the information submitted by the applicant, under ORS 244.020(7)(b)(H)(i) this fact-finding mission is hereby:

☒ Officially Sanctioned

☐ Denied



Secretary of the Senate

October 6, 2025
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

Sent via email

October 6, 2025

Amanda Hess
NW Public Affairs, LLC
11481 SW Hall Blvd, Suite 201-N
Portland, Oregon 97223

RE: Advice No. 25-645I

Dear Ms. Hess:

This letter of advice is provided in response to your request received on September 18, 2025 for guidance on how the gift exceptions in ORS 244.020(7)(b) would apply to a legislator receiving paid expenses for a trip to attend a Google State Policy Summit (Policy Summit) at Google's Chicago offices.

The information provided indicates that legislators have been invited to attend the Policy Summit which will take place from October 20 to 22, 2025. The Policy Summit is an interactive, educational convening of state legislative leaders from across the country to share ideas and interface directly with Google product and policy staff. The Policy Summit agenda includes policy topics, including AI, privacy, online safety, and energy & data centers. It also includes one evening reception, small group dinners and a "social event @ Wrigley Field." Google has offered to cover transportation to and from the Policy Summit, meals, and lodging. You have asked whether this event and Google's offer of paid travel expenses would qualify for the gift exception in ORS 244.020(7)(b)(H).

Under most circumstances when a public official is offered food, lodging and travel expenses at no cost to the public official, it would be a gift as defined in ORS 244.020(7)(a), and therefore subject to the gift limitations set forth in ORS 244.025. There are exceptions that allow a public official to accept certain items, such as paid expenses for food, lodging and travel. In pertinent part, ORS 244.020(7)(b)(H) allows acceptance of the payment of reasonable expenses for food, travel or lodging expenses provided to a public official, and a relative, household member, or staff member accompanying that public official, when the public official is representing state government on an officially sanctioned trade-promotion or fact-finding mission or in officially designated negotiations or economic development activities.

To qualify for this gift exception, the following criteria must be met. First, the public official must be representing state government, a local government or a special government body.

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. The Commission has adopted an Administrative Rule that defines a “fact finding mission or trip” 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 the location being visited.” [OAR 199-005-0001(2)].

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)].

Based on the information provided, assuming the legislators are attending the Policy Summit in their official capacities, as representatives of state government, that would satisfy the first criteria. For the second criteria, the Policy Summit would appear to qualify as a fact-finding mission, as it has an educational purpose and is aimed at developing intergovernmental relationships and sharing best practices. For the third criteria, the legislators who are invited to attend the Policy Summit would need to follow the procedure(s) required by their leadership in the Legislative Assembly to ensure the activities are officially sanctioned or designated.

Assuming that all three criteria are satisfied, then it would appear that under the gift exception in ORS 244.020(7)(b)(H), the legislators could accept the food, travel and lodging expenses paid by Google for their attendance at the Policy Summit.

Please note that the gift exception in ORS 244.020(7)(b)(H) applies only to reasonable food, travel or lodging expenses. It does not apply to entertainment expenses. We note that the agenda for the Policy Summit includes a “social event @ Wrigley Field.” You have indicated that this “social event” is not a baseball game or other entertainment event, but rather that the stadium is being used as a venue for the Policy Summit reception, which will include a tour of the stadium, as well as food and beverages for the reception.

ORS 244.020(7)(b)(M) provides that a public official can accept entertainment that is incidental to the main purpose of another event. OAR 199-005-0025(1) clarifies:

Entertainment is incidental when it is secondary to the main purpose of the primary event and provided in conjunction with the primary event (such as a singer or band at an awards dinner). Incidental entertainment is secondary in importance and in time devoted to the entertainment compared to the primary, non-entertainment

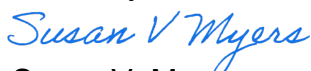
event. Entertainment that involves personal participation is not incidental to another event (such as a golf tournament at a conference).

In this case, while a tour of the stadium could, perhaps, be a form of entertainment, that entertainment appears to be secondary to the main purpose of the primary event, which would be the Policy Summit reception taking place at Wrigley Field. Thus, it would appear that the entertainment associated with this reception would fall under the gift exception in ORS 244.020(7)(b)(M). And the reception itself would qualify as part of the food expenses authorized under ORS 244.020(7)(b)(H).

Finally, as legislators are required to file Annual Verified Statements of Economic Interest (SEI), each legislator attending this Google Policy Summit and receiving the paid travel expenses will be required to report the aggregate value of these paid expenses on their 2026 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, Google, the source of the paid expenses, should provide the legislators with a written statement of the expenses they paid on that legislator's behalf.

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

Sincerely,



Susan V. Myers
Executive Director

Agenda

Unless otherwise noted, all programming will take place at Google Chicago, located at 320 N Morgan Street, Chicago, Illinois.

Monday, October 20

Artificial Intelligence

Public Sector AI – Agentic AI Products – Model Safety & Security

9:00 AM – 5:00PM

Reception

5:00 PM – 6:30PM

Small Group Dinners (Optional)

7:00 PM *Off Site

Tuesday, October 21

Energy & Data Centers

Strengthening the Electric Grid – Cost Allocation – Data Centers in Communities

9:00 AM – 5:00 PM

Social Event @ Wrigley Field

6:30 PM *Wrigley Field

Wednesday, October 22

Online Safety, Privacy

YouTube – Platform Age Assurance – Mental Health & Kids

9:00 AM – 1:00 PM

Questions: Reach out to statepolicysummit@gmail.com

In Accordance with Senate Rule 14.15 for 2025 Google State Policy Summit

1) Oregon Legislative Participants

- Senator Floyd Prozanski
- Senator David Brock Smith

No legislative staff or family members participated.

2) Aggregate Value Provided for travel, lodging and food

- Total reimbursement to Senator Floyd Prozanski - \$1,968.27
- Total reimbursement to Senator David Brock Smith - \$1,701.03

3) Written Confirmation: The trip was done in accordance with the provided itinerary and all other written correspondence.

If you need any additional information, please reach me at phil@nwpublicaffairs.com.

Thank you!