

BEFORE THE OREGON GOVERNMENT ETHICS COMMISSION

In the Matter of)	STIPULATED FINAL ORDER
)	
Jake Huffman)	CASE NO. 25-134EAM
_____)	

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 Jake Huffman.
2. JURISDICTION:
 - A. The Crook County High School is a public body, and the Crook County School District Board of Directors is its governing body. [ORS 192.610(5) and (6)].
 - B. At all material times, Jake Huffman was the Principal or Assistant Principal of Crook County High School within the Crook County School District. As such, Jake Huffman was a public official required to comply with the provisions of Oregon Government Ethics Law, ORS Chapter 244.
 - C. On May 9, 2025, the Commission considered information in the preliminary review phase of case No. 25-134EAM and acted to find cause to open an investigation of this matter.

3. APPLICABLE LAW:

- A. ORS 244.040(1) prohibits a public official from using or attempting to use the public official's position or office to obtain a financial benefit or avoid a financial detriment for the public official, the public official's relative or a business with which the public official or the official's relative is associated, if the financial benefit or avoidance of detriment would not otherwise be available but for the public official's holding the official position. Subsection (1) of this section does not apply to any part of an official compensation package as determined by the public body that the public official serves.
- B. ORS 244.020(2) defines "business" as any legal entity operated for economic gain, but excluding any income-producing non-profit 501(c) corporation with which a public official or their relative is associated only as a member, as a board director, or in an unpaid capacity.
- C. ORS 244.020(3)(a) defines a "business with which the person is associated" as including any private business or closely held corporation of which they are a director, officer, owner, employee, or agent, or one in which they currently hold, or held within the past calendar year, stock, stock options, equity interest or debt instruments worth \$1,000 or more. Jake Huffman is the owner of Central Oregon Wrestling Academy, LLC (COWA) and therefore COWA is a business with which he is associated.
- D. 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)].

- E. ORS 244.120(1)(c) directs that when met with an actual or potential conflict of interest, an appointed public official is required to notify their appointing authority in writing of the nature of their conflict of interest and request they dispose of it. The appointing authority can do so by appointing another employee to handle the matter or by directing the conflicted official to handle it in a specific manner.

4. STIPULATED FACTS:

- A. Jake Huffman is the owner of COWA. From April 2022 to April 2025 COWA used Crook County School District (District) facilities without paying any fees. Additionally, COWA used Jake Huffman's District issued key to access District facilities.
- B. From April 2022 to December 2024, COWA used the District's high school gym facilities without a contract and without paying a fee. During this period of time COWA did not have a contract from the District to use the gym but rather used time and space contracted for by a separate non-profit (the Cowboy Mat Club). The Commission received a statement from the non-profit explaining that the non-profit and COWA coordinated the use of district facilities to provide instruction for advanced wrestlers and that it was the non-profit, and not COWA, that contracted with the district for the use of the district facilities.
- C. Subsequently COWA entered into a Facilities Use Agreement with the District from December 22, 2024, through April 2025 to use the high school gym without having to pay a fee, despite being a for-profit business

that would have been charged a fee of \$20.00 per hour pursuant to the District's Community Use of District Facilities Policy.

- D. By using the District's facilities for COWA to hold its practices, Jake Huffman avoided the cost of paying for his private business's expenses, and this avoidance of financial detriment would not have been available to them but for holding their official position as the High School Principal and Vice Principal. Thus, Jake Huffman violated ORS 244.040(1).
- E. Jake Huffman failed to notify their appointing authority in writing that he had an actual conflict of interest each time he used their District-issued key to enter into the high school gym to operate a for-profit business, a business with which he is associated, with a financial impact, outside of a contract authorizing them to do so. By failing to do so, Jake Huffman violated ORS 244.120(1)(c).
- F. Jake Huffman, on behalf of COWA, made two payments to the Crook County School District totaling \$5,260.00 on September 5, 2025. The payments are reimbursement to the district for facilities usage fees for the period of time COWA used the gym from April 2022 through April 2025.
- G. A letter from the Crook County School District Superintendent states that Jake Huffman has taken full responsibility and has paid all retroactive fees to the district. The letter describes Jake Huffman as "a dedicated and ethical educator who consistently upholds district policies and maintains the public trust [and who is] deeply committed to serving our students, staff, and community with integrity."
- H. Jake Huffman contends that there was neither knowing nor intent to commit a violation of ORS 244.040(1) or ORS 244.120(1)(c); that he acted

in good-faith when COWA and the non-profit held wrestling practices; that he was unaware that he was committing any violations; that he cooperated fully and transparently with the Commission; and that he immediately took full responsibility and fully reimbursed the district for COWA's use of district facilities.

- I. Jake Huffman contends that his involvement with COWA was not a source of material financial gain. He contends that allegations that COWA earns nearly \$700,000 in revenue are incorrect and that COWA's annual gross income is approximately \$13,000 and its annual net earnings ranged from an annual loss exceeding \$14,200 to a small profit of \$1,774.

5. CONCLUSION/VIOLATION:

- A. The actions described in paragraph 4(D) and 4(E) each constitute one violation of ORS 244.040(1) and one violation of ORS 244.120(1)(c).
- 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) and one violation of ORS 244.120(1)(c).

5. TERMS OF SETTLEMENT:

The parties agree as follows:

- A. Jake Huffman has indicated that he wishes to conclude this matter by agreeing to the terms and conditions in this order without completing the investigation phase.

- B. ORS 244.350 authorizes the Commission to assess civil penalties of up to \$5,000 for each violation of ORS 244.040 set forth in paragraph 4(D) and each violation of ORS 244.120 set forth in paragraph 4(E).
- C. Jake Huffman will pay a civil penalty, as authorized by ORS 244.350, in the amount of \$1,000 in order to settle and compromise this matter. Payment in full will be made payable to the Commission no later than 30 days from the date this stipulated final order is fully executed.
- D. The Commission releases, settles and compromises any and all claims, which have been or could be asserted against Jake Huffman within the scope of the above-referenced proceedings.
- E. Jake Huffman will initiate no claims, litigation or other action against the Commission as a result of these proceedings.

5. 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.

6. EFFECT:

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

By signing this agreement, Jake Huffman agrees to waive his 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, Jake Huffman agrees to waive his 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:

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Respondent: Jake Huffman

September 26, 2025

Date

David Fiskum, Chairperson
Oregon Government Ethics Commission

Date