

# OREGON GOVERNMENT ETHICS COMMISSION

## PRELIMINARY REVIEW

**CASE NO:** 26-067EJS  
**DATE:** April 14, 2026  
**RESPONDENT:** LAVALLEE, Chad, Fire Chief, Alfalfa Fire District  
**COMPLAINANT:** WALKER, Ian  
**RECOMMENDED ACTION:** Move investigate possible violations of ORS 244.040(1), ORS 244.177(1), ORS 244.179(1), and ORS 244.120(1)(c)

1 **PRELIMINARY REVIEW:** The Oregon Government Ethics Commission (Commission)  
2 received a signed written complaint on February 16, 2026 from Ian Walker. Ian Walker  
3 alleges that Chad LaVallee, Fire Chief for the Alfalfa Fire District (AFD), may have  
4 violated Oregon Government Ethics Law by failing to disclose his conflicts of interest,  
5 and by hiring and supervising his relative. (#PR1). Receipt of the complaint was  
6 acknowledged in letters to Ian Walker and Chad LaVallee. Chad LaVallee was provided  
7 with the information received in the complaint and invited to provide any information that  
8 would assist the Commission in conducting this preliminary review. (#PR2).

9

### 10 Complaint

11 In the complaint, Ian Walker states that Chad LaVallee, AFD Fire Chief, hired his wife,  
12 Leslie LaVallee, as a full-time AFD employee in July 2023. The complaint states that  
13 Leslie LaVallee's salary is funded by an Oregon State Fire Marshal (OSFM) capacity  
14 grant that is managed by Chad LaVallee. The complaint states that Chad LaVallee is  
15 the primary AFD employee and he exercises sole authority over all staff and  
16 contractors. The complaint also states that he manages AFD financial records, including  
17 payroll for his wife. (#PR1).

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1 The complaint states that AFD records do not indicate that there was a public job  
2 posting or competitive recruitment process for the position filled by Leslie LaVallee, and  
3 it states that there is conflicting information about whether Chad LaVallee consulted with  
4 the Board regarding his conflict of interest. The complaint alleges that Chad LaVallee  
5 failed to disclose his conflicts of interest and violated the nepotism provisions of  
6 Government Ethics Law by appointing and supervising his relative. (#PR1).

7

8 Response

9 On February 20, 2026 and March 9, 2026, Chad LaVallee provided Commission staff  
10 with information in response to the complaint. In his responses, Chad LaVallee states  
11 that he did not conceal his relationship with his wife, Leslie LaVallee, when she was  
12 hired for the position of Firefighter Emergency Medical Technician (EMT) in July 2023.  
13 He states that the decision to employ her was presented to the AFD Board prior to  
14 finalization, and after discussion, the Board formally voted to approve her employment.  
15 (#PR3, #PR6).

16

17 Chad LaVallee states that he consulted with the Board for guidance, “as it was a conflict  
18 of interest [a]nd asked for them to advise moving forward. They discussed it and gave  
19 me the go ahead to move forward.” Chad LaVallee states that the “duty officer” is Leslie  
20 LaVallee’s direct supervisor. He also states that her checks are issued through  
21 QuickBooks payroll, and the Board reviews the expenditures monthly. Chad LaVallee  
22 states that the Board retained financial oversight authority and they review Leslie  
23 LaVallee’s monthly payroll expenditures. (#PR3, #PR6).

24

25 Chad LaVallee explains that the AFD operated with a single paid employee, himself,  
26 and a volunteer workforce until Leslie LaVallee was hired. He states that volunteers  
27 were offered the opportunity to assume the new OSFM capacity grant position, but they  
28 all declined. He states that the volunteers primarily declined due to the wage, as most  
29 would be taking a pay cut if they accepted the position. (#PR3; #PR6).

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1 Chad LaVallee states that when Leslie LaVallee was hired, the AFD did not have a  
2 conflict of interest or nepotism policy, nor did they have a comprehensive understanding  
3 of their requirements. He states that any noncompliance, if determined, was inadvertent  
4 and unintentional. Chad LaVallee explains that the AFD is implementing new nepotism  
5 and conflict of interest policies, as well as training requirements to ensure future  
6 compliance. (#PR3).

7  
8 May 10, 2023 Board Meeting

9 The minutes for the AFD Board meeting on May 10, 2023 state that Chad LaVallee  
10 presented the Chief's report and financial review. During his report, Chad LaVallee  
11 stated that the OSFM awarded the AFD with \$294,594 to pay for a full-time staff  
12 member for three years. (#PR7).

13  
14 June 14, 2023 Board Meeting

15 At the AFD Board meeting on June 14, 2023, Chad LaVallee presented a report to the  
16 Board. Chad LaVallee stated that the new full-time position would begin on July 1, 2023,  
17 and it would be a three year full-time position. (#PR4).

18  
19 Capacity Grant Review

20 A letter on AFD letterhead titled Capacity Grant: Year 1 Review states that a grant-  
21 funded position was filled internally by one of AFD's EMTs, Leslie LaVallee. The letter  
22 states:

23  
24 After a meeting with all of the volunteers, and several discussions with our board  
25 about conflict of interest, she was the only one to accept internally and was  
26 offered the position. This was due to pay as most would have taken a pay cut  
27 from their current positions outside the agency. (#PR5).

28  
29 The letter goes on to describe the work completed by Leslie LaVallee and it expresses  
30 appreciation for the grant award funding the additional staffing. (#PR5).

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1 Employment Agreement

2 The AFD Employment Agreement for Leslie LaVallee appoints her to the regular, full  
3 time position of Firefighter EMT beginning July 1, 2023. The Employment Agreement  
4 provides that Leslie LaVallee would receive an annual salary of \$51,000, and it states,  
5 “[e]mployee shall report to and be supervised by the Duty Chief or designee.” The  
6 Employment Agreement was signed by Leslie LaVallee on June 19, 2023 and by  
7 Nathan (Nate) Starr on June 20, 2023. (#PR9).

8

9 Nate Starr Response

10 Commission staff received an email from Nate Starr on March 12, 2026 with additional  
11 information related to the complaint. Nate Starr explains that the AFD Board approved  
12 Leslie LaVallee’s hiring in June 2023. He states that the Board discussed the matter at  
13 length, and he is unsure why the discussion was not included in the meeting minutes.  
14 (#PR8).

15

16 Nate Starr states that Chad LaVallee brought his conflict of interest to the Board for  
17 guidance and direction. He states that Chad LaVallee explained how he had asked all  
18 the EMT trained personnel if they wanted the position, but no one did, so in the best  
19 interest of the AFD, he consulted the Board for “guidance and approval or denial.” Nate  
20 Starr states that they were unaware that a written conflict of interest disclosure was  
21 needed. He explains that this was a unique circumstance for the AFD as the Duty Chief  
22 is typically their only employee, and they were unaccustomed to the hiring process.  
23 Nate Starr states that the Board discussed the matter and, “because no other volunteer  
24 with the district was interested,” decided to instruct Chad LaVallee to move forward with  
25 hiring Leslie LaVallee. He states that Leslie LaVallee had already been with the AFD for  
26 some time, and she was qualified for the position. (#PR8).

27

28 Nate Starr explains that Leslie LaVallee reports to the duty officer on shift, and “[t]he  
29 only time that Mrs. LaVallee would be supervised by [Chief] LaVallee would be in the  
30 absence of the duty officer.” He also explains that Leslie LaVallee’s position has a  
31 contracted salary which was entered into QuickBooks payroll, and her bi-weekly pay is

1 automated. He states that the Board reviews and approves all monthly expenses at  
2 their regularly scheduled board meetings. (#PR8).

3  
4 Resignation

5 Leslie LaVallee submitted a letter of resignation to the AFD on February 1, 2026. In her  
6 letter, she provides formal notice of her resignation from the position of Firefighter EMT  
7 for the AFD, effective February 1, 2026. (#PR10).

8  
9 **RECOMMENDATION:** Chad LaVallee is the Fire Chief for the Alfalfa Fire District and  
10 has held that position during the period relative to this review. As such, he is a public  
11 official, as defined in ORS 244.020(15), and therefore subject to Oregon Government  
12 Ethics Law.

13  
14 Conflict of Interest

15 A conflict of interest means any action, decision, or recommendation by a person acting  
16 in their capacity as a public official, the effect of which would be (actual conflict of  
17 interest) or could be (potential conflict of interest) to the private financial benefit or  
18 detriment of the person, their relative, their household member or a business with which  
19 they, their relative, or their household member are associated. [ORS 244.020(1) and  
20 ORS 244.020(13)].

21  
22 A “relative” is defined in ORS 244.020(16)(a) as including the “spouse, parent,  
23 stepparent, child, sibling, stepsibling, son-in-law or daughter-in-law of the public official.”  
24 Leslie LaVallee, Chad LaVallee’s wife, is a relative of Chad LaVallee for the purposes of  
25 Oregon Government Ethics Law.

26  
27 When met with a conflict of interest, a public official serving as an employee, such as  
28 Chad LaVallee, must provide written notification to his appointing authority of the nature  
29 of the conflict of interest and request that the appointing authority dispose of the matter  
30 giving rise to the conflict of interest. The appointing authority can dispose of the matter  
31 by designating an alternate employee for the matter or by directing the public official on

1 how to handle the matter. [ORS 244.120(1)(c)].

2

3 The complaint in this case alleges that Chad LaVallee may have violated the conflict of  
4 interest provisions of Oregon Government Ethics Law when he participated in the hiring  
5 of his wife to a position with the AFD. The information available during this preliminary  
6 review indicates that a full time Firefighter EMT position became available when the  
7 position was funded through an OSFM capacity grant. It appears that Chad LaVallee  
8 may have offered the AFD EMT volunteers the opportunity to fill the position, but they all  
9 declined. It appears that the position was then offered to Leslie LaVallee. Chad  
10 LaVallee stated that he was aware that he had a conflict of interest, and he asked the  
11 Board for direction. He stated that the Board discussed how to proceed and gave him  
12 “the go ahead to move forward” with hiring her. Nate Starr, AFD Board President, stated  
13 that Chad LaVallee consulted with the Board “for guidance and approval or denial.”  
14 Minutes for the AFD Board meetings on May 10, 2023 and June 14, 2023 indicate that  
15 Chad LaVallee provided status updates about the position, but the minutes do not  
16 indicate that the Board made a hiring decision. Nate Starr stated that, although not  
17 included in the meeting minutes, the Board considered, discussed, and approved the  
18 hiring of Leslie LaVallee. Nate Starr signed Leslie LaVallee’s employee contract on  
19 June 20, 2023. Nate Starr explained that they were unaware that a written conflict of  
20 interest notification was necessary.

21

22 It appears Chad LaVallee was met with a conflict of interest when he consulted the AFD  
23 Board about hiring his relative, Leslie LaVallee, to the grant funded Firefighter EMT  
24 position. The information available in this preliminary review indicates that Chad  
25 LaVallee asked the Board for guidance about how to proceed; however, it does not  
26 appear that he provided the Board with the statutorily required written notification of his  
27 conflict of interest, requesting that the matter be disposed of. It further appears that  
28 Chad LaVallee may have approached Leslie LaVallee about filling the Firefighter EMT  
29 position prior to requesting guidance from the Board. Therefore, it appears that Chad  
30 LaVallee may have violated the conflict of interest provisions as described in ORS  
31 244.120(1)(c).

1 Use of Office

2 ORS 244.040(1) prohibits public officials from using or attempting to use their official  
3 position or office to obtain a financial benefit or avoid a financial detriment for  
4 themselves, their relatives or household members, or any businesses with which they,  
5 their relatives or household members are associated, if the financial gain or avoidance  
6 of financial detriment would not have been available but for holding the public position.  
7 This prohibition applies regardless of whether the public official has announced or  
8 disclosed a conflict of interest. [ORS 244.040(8)].

9

10 The information in this case indicates that, as the AFD Fire Chief, Chad LaVallee may  
11 have facilitated the hiring of his relative, Leslie LaVallee. It appears that Chad LaVallee  
12 may have offered the Firefighter/EMT position to other AFD volunteers, who declined,  
13 and then he may have suggested to the Board that Leslie LaVallee could fill the  
14 position. It does not appear that there was a public job posting or competitive  
15 recruitment process for the position. But for Chad LaVallee's official position as Fire  
16 Chief, it does not appear that he would have been able to initiate the hiring of Leslie  
17 LaVallee. Although the Board President stated that the Board approved the employment  
18 of Leslie LaVallee, it appears that Chad LaVallee may have used his position to provide  
19 her with the opportunity to fill the position. The information provided in this preliminary  
20 review appears to indicate that Leslie LaVallee may not have been able to acquire the  
21 EMT Firefighter position except for Chad LaVallee's actions taken in his official capacity.  
22 Thus, it appears that Chad LaVallee may have engaged in a prohibited use of office, in  
23 violation of ORS 244.040(1).

24

25 Nepotism

26 ORS 244.177(1)(a) provides that "[a] public official may not appoint, employ or promote  
27 a relative or member of the household to, or discharge, fire or demote a relative or  
28 member of the household from, a position with the public body that the public official  
29 serves or over which the public official exercises jurisdiction or control, unless the public  
30 official complies with the conflict of interest requirements of this chapter."

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1 ORS 244.177(1)(b) prohibits a public official from interviewing, discussing or debating  
2 the appointment, employment or promotion of a relative to a position with the public  
3 body the public official serves or over which the public official exercises jurisdiction or  
4 control. This provision clarifies that “participate” does not mean serving as a reference,  
5 providing a recommendation or performing other ministerial acts that are part of the  
6 normal job functions of the public official. Unlike ORS 244.177(1)(a), a conflict of  
7 interest declaration does not allow a public official to participate in an interview,  
8 discussion or debate regarding the appointment, employment or promotion with the  
9 public body the public official serves.

10  
11 ORS 244.177(4) clarifies that a public body is not prohibited from appointing, employing  
12 or promoting a person who is a relative or member of the household of a public official  
13 serving the public body.

14  
15 The information available during this preliminary review indicates that AFD Fire Chief  
16 Chad LaVallee participated in the employment of his relative to a full time position with  
17 the AFD. Although it appears that Chad LaVallee may have provided a verbal disclosure  
18 to the Board, requesting guidance and approval, it does not appear that he complied  
19 with the conflict of interest requirements in ORS 244.120(1)(c). The Board President  
20 indicated that the Board instructed Chad LaVallee to move forward with hiring Leslie  
21 LaVallee; however, because it appears that he failed to comply with the conflict of  
22 interest provisions, it appears that he may have violated ORS 244.177(1)(a) by  
23 employing Leslie LaVallee as a full time Firefighter EMT for the AFD. Further, because it  
24 appears he was involved in the discussion or debate regarding the appointment of his  
25 spouse to the position with the public body, it would appear that Chad LaVallee may  
26 have violated ORS 244.177(1)(b). It is important to note that the AFD was not prohibited  
27 from appointing, employing or promoting Leslie LaVallee to the position of full time  
28 Firefighter EMT; rather, the issue appears to be that Chad LaVallee, her spouse, was  
29 involved in her appointment to the position in ways that may have violated the nepotism  
30 provisions of Oregon Government Ethics Law.

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1 ORS 244.179(1) provides that “a public official acting in an official capacity may not  
2 directly supervise a person who is a relative or member of the household.” The statute,  
3 however, has a number of exceptions, with ORS 244.179(4) authorizing public bodies to  
4 “adopt policies specifying when a public official acting in an official capacity may directly  
5 supervise a person who is a relative or member of the household.”

6  
7 OAR 199-008-0008 further provides that a “policy that specifies when a public official  
8 acting in an official capacity may directly supervise a relative shall be in writing and shall  
9 be formally adopted by the public body that the public official serves.” \* \* \* “Any such  
10 policy shall provide for delegation to another person of any task that would constitute a  
11 prohibited use of office for financial gain pursuant to ORS 244.040(1) or a conflict of  
12 interest pursuant to ORS 244.120.”

13  
14 The information in this preliminary review indicates that Leslie LaVallee, in her position  
15 as an EMT Firefighter was directly supervised by the duty officer, and in the absence of  
16 a duty officer, Chad LaVallee supervised Leslie LaVallee. Chad LaVallee explained that  
17 he was the only other paid employee for the AFD. Leslie LaVallee’s employment  
18 contract states, “[e]mployee shall report to and be supervised by the Duty Chief or  
19 designee;” however, her employment contract is not a qualifying policy as defined in  
20 OAR 199-008-0008. Although it appears that the AFD is in the process of adopting a  
21 nepotism policy, it does not appear that, during the relevant period, the AFD had a  
22 policy specifying when Chad LaVallee was authorized to supervise Leslie LaVallee, or  
23 how to delegate tasks that would result in violations of ORS 244.040(1) or ORS  
24 244.120. Thus, it appears that Chad LaVallee may have violated ORS 244.179(1) by  
25 supervising his relative.

26  
27 Based on the information available in this preliminary review, there appears to be a  
28 substantial objective basis to believe that Chad LaVallee may have violated the conflict  
29 of interest, nepotism, and prohibited use of office provisions of Oregon Government  
30 Ethics Law.

31 ///

1 The Oregon Government Ethics Commission should move to investigate whether Chad  
2 LaVallee may have violated ORS 244.040(1), ORS 244.177(1), ORS 244.179(1), and  
3 ORS 244.120(1)(c). (Motion 4).


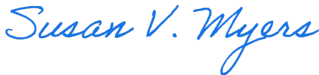
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7 **ASSOCIATED DOCUMENTS:**

8 #PR1 Original Complaint Submitted on 2/16/2026  
9 #PR2 Open PR Email sent 2/19/2026  
10 #PR3 Chad LaVallee Response received 2/20/2026  
11 #PR4 Board Meeting Minutes for 6/14/2023  
12 #PR5 Capacity Grant Review received 2/16/2026  
13 #PR6 Email Response from Chad LaVallee on 3/9/2026  
14 #PR7 Board Meeting Minutes for 5/10/2023  
15 #PR8 Nathan Starr Email Response on 3/12/2026  
16 #PR9 Leslie LaVallee Employment Contract dated 6/20/2023  
17 #PR10 Leslie LaVallee Resignation dated 2/1/2026

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