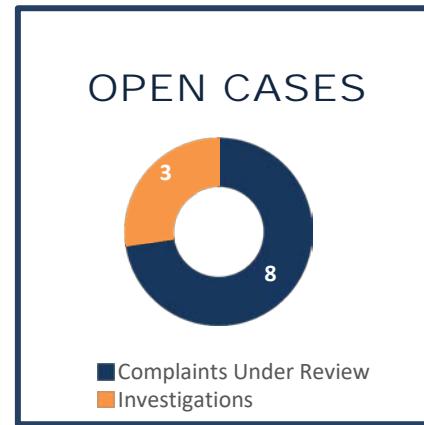
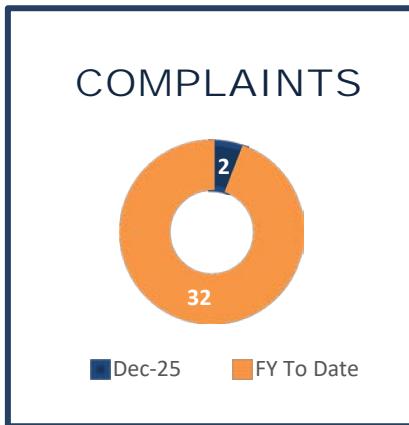




OFFICE OF ETHICS

Ethics Officer's Report for December 2025



EDUCATION Program

Staff presented an Ethics Office overview at two new employee orientations hosted by Human Resources and four in-person *Government Ethics 101* trainings to employees at Weymouth and Carson (Advanced Purification Center).

Community and Workplace Culture Committee Chair Tana McCoy and Committee Member Jacquelyn McMillan joined Ethics Office staff at the 47th Annual Council on Governmental Ethics Laws (COGEL) conference in Atlanta, Georgia. Over 400 government ethics professionals from around the U.S. and Canada were in attendance. Sessions included: *Navigating Workplace Investigations: The Intersection of Access and Transparency, Privacy, and Ethical Considerations*; *Think Like a Writer! A Workshop in Creating Content for Effective Training and Public Communications*; *Independence Under Fire: How to Protect Ethics Commissions from Political Interference*; and *Perilous Procurements: Ethics Guardrails for Public Contracts*.

Investigations staff attended the Society of Corporate Compliance and Ethics (SCCE) Basic Training Academy in Anaheim. Sessions included: *Organizational Ethics*; *Compliance Oversight and Structure*; *Creating and Reviewing Compliance Policies and Procedures*; *Discipline and Program Improvement*; *Education and Training*; *Raising a Concern and Investigations*; and *Conflicts of Interest*.

COMPLIANCE Program

Form 700/Filing Officer Duties – Pursuant to state law and the Administrative Code, Compliance staff assisted directors and employees with their Annual, Assuming Office, and Leaving Office Form 700 filings. Assistance included troubleshooting the electronic filing system and issuing notices of deadlines. In total, staff addressed 22 compliance-related matters for directors and employees related to Form 700.

Annual Form 700 Compliance – All directors have filed their 2024 Annual Form 700. One employee has not yet filed their 2024 Annual Form 700. Staff will continue efforts to reach 100% compliance.

AB 1234 Ethics Training Compliance – One director has not submitted their ethics training certificate to the Ethics Office. Staff will continue efforts to confirm 100% compliance.

ADVICE Program

Staff addressed 17 time-sensitive advice matters for directors and employees related to conflicts of interest, gifts, and other ethics-related topics.

Staff also helped screen for potential conflicts of interest in Committee and Board items and prepare disclosure scripts for directors required to disclose financial interests and recuse from agenda items.

INVESTIGATION Program

Complaints Received – The Ethics Office received two new complaints in December. One complaint was not ethics related and was referred to another office for review. The other complaint contained multiple allegations (one non-ethics concern was referred to another office for review and one potential ethics-related concern is currently under preliminary review by the Ethics Office).

Complaints Resolved – Following a preliminary review, one complaint alleging multiple ethics violations against multiple individuals in relation to a recruitment process was closed with no further action because the evidence reviewed did not support the allegations. It took 50 calendar days to complete this preliminary review.

Open Complaints and Investigations – As of December 31, 2025, the Investigation Program was managing a total of eight open ethics complaints under preliminary review and three ongoing ethics investigations. The first ongoing investigation, alleging a conflict of interest, was opened in September and is expected to be completed within the standard six-month timeframe. The other two investigations also allege conflicts of interest. Both were opened in November and are also expected to be completed within the standard six-month timeframe.

Alternative Complaint Hotline – No complaints were filed via the Alternative Complaint

Hotline in December.

ADMINISTRATION

Professional Services Contracts – The Ethics Office did not enter into any new contracts for professional services in December.

MISSION

The Ethics Office promotes the highest standards of government integrity to support Metropolitan's mission through an independent and comprehensive program that enhances trust, transparency, and accountability for the benefit of the workforce and the public it serves.

VISION

Our vision is to be a leader in governmental ethics with an unparalleled commitment to supporting an ethical organizational culture.