



Monthly Report February 2025

EDUCATION Program

Ethics Education staff presented an Ethics Office overview at new employee orientations hosted by Human Resources, held a training session for a new Form 700 filer, and attended two Fair Political Practices Commission trainings: Form 700 (SEI) Filers and Form 700 (SEI) Filing Officer. Education staff met with Human Resources, Information Technology, the Professional Services Contracting Team, and Diversity, Equity and Inclusion staff for feedback and subject matter expertise related to the development of ethics education materials. Staff also refined the new employee orientation ethics presentation.

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 notifications of deadlines. Staff also evaluated which new Metropolitan positions must file Form 700 and the appropriate level of disclosure for each position.

AB 1234 compliance – Managed AB 1234 state ethics training compliance for Metropolitan. As of February 21, 2025, 84% of Metropolitan officials required to take ethics training have complied with the state requirement. Eleven have not completed the training. Staff will continue efforts to seek 100% compliance.

Staff also assisted on 71 compliance-related matters for Metropolitan Directors and staff.

ADVICE Program

Advice staff addressed 27 time-sensitive advice requests for directors and employees related to the following ethics laws and policies: conflicts of interest, financial disclosure, gifts, and other ethics-related topics. Examples of advice requested includes:

- Whether officials must disclose their ETFs, personal residence, outside income, spouse's income, and other interests on Form 700.
- Whether the ban on gifts from restricted sources prohibits a Metropolitan vendor's gift card emailed to employees and a consultant project manager's gifts left on an employee's desk.
- Whether an outside association's offer to pay for an employee's travel to attend an association meeting is an impermissible excess gift, needs to be reported on Form 700, is subject to the ban on gifts from restricted sources, or raises other ethics concerns.
- Whether an official's recent sale of stock in a company affects their ability to participate in future Metropolitan matters involving that company.

Staff also helped identify and advise on potential conflicts of interest in upcoming Committee and Board agenda items; requested formal advice from the Fair Political Practices Commission, on behalf of an employee, on interpreting an exception to the state's definition of "gift"; and provided guidance on Metropolitan's hiring process and a proposed joint event with a non-profit organization to avoid the appearance of impropriety.

INVESTIGATION Program

Complaints – The Ethics Office received five new complaints involving the following allegations:

- Misuse of authority by managers for personal gain.
- Misuse of authority by a manager to disadvantage an employee.
- Inappropriate management directive regarding contract language.
- Concern regarding mandatory payroll deductions.
- Illegal dumping and vandalism at a Metropolitan field property.

Open Complaints and Investigations – As of February 28, 2025, the Investigations Program is managing a total of 14 open complaints and one open ethics investigation.

SNAPSHOT for February 2025

Advice Matters

27

Pending Complaints

14

Compliance Assistance

71

Investigations Opened

0

New Complaints Received

5

Pending Investigations

1

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.