



Monthly Report

April 2025

EDUCATION Program

Ethics staff presented an Ethics Office overview at new employee orientations hosted by Human Resources; provided an overview of the Prohibited Director Communications policy to the Community and Workplace Culture Committee; distributed a fact sheet to directors on Prohibited Director Communications; and issued the quarterly ethics newsletter.

Assistant Ethics Officer Kelli Shope and Administrative Analyst Hilda Rodriguez completed the Society of Corporate Compliance and Ethics (SCCE) Basic Compliance and Ethics Academy program. The four-day program featured sessions including: *Organizational Ethics; Conflicts of Interest; Education and Training; Raising a Concern and Investigations; Compliance Oversight and Structure; Compliance Risk Assessment; and Best Practices, Benchmarking, and Perspectives* among other courses.

Staff also attended panel sessions hosted by the Council on Governmental Ethics Laws: *Getting the Message: Measuring the Impact of Your Training and Violations and Punishment--Ethics Professionals Highlight Real Cases.*

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 43 compliance-related matters for Metropolitan Directors and staff related to Form 700. Staff also secured re-certification of Metropolitan's Form 700 electronic filing system, periodically required by state law.

Annual Form 700 Compliance – As of April 30, five directors and 61 employees had not yet filed their Annual Form 700. While typically due April 1, the annual Form 700 filing deadline was extended to June 2, 2025 for qualifying filers due to the January fires in Los Angeles County. Staff will continue efforts to reach 100% compliance by June 2.

Conflict of Interest Code – Staff evaluated three job descriptions, designated the positions as Form 700 filing positions, and determined the level of disclosure for each position. The positions have been added provisionally to the COI Code pending final approval during the biennial COI Code amendment process.

AB 1234 Compliance –84% of Metropolitan officials required to take biennial AB 1234 state ethics training are in compliance. Nine officials are not in compliance. Staff will continue efforts to seek 100% compliance.

ADVICE Program

Advice staff addressed 33 time-sensitive advice requests for directors and employees related to the following ethics areas: conflicts of interest, financial disclosure, recusals, gifts from vendors, manager gifts to subordinate staff members, political activities, and other ethics-related topics.

Examples of advice requested:

- Whether a blackout period between contractors and staff is required during an active RFQ process.
- Whether an employee's prohibited gift can be "cured" during the 30-day cure period, pursuant to state regulations.
- Whether employees may accept lunch from a vendor at a sales pitch meeting.
- Whether political donations must be reported on Form 700.
- Whether an ethics policy prevents directors from serving as a reference for individuals seeking Metropolitan employment.

Staff also helped identify and advise on potential conflicts of interest in Committee and Board agenda items.

INVESTIGATION Program

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

- A Metropolitan contractor mistreating their employee. [Referred to HR]
- Employee not performing work during paid work hours. [Referred to HR]
- Two instances of misuse of authority by employees for personal gain. [Under review]
- Misuse of authority by a manager for personal gain. [Under review]
- Retaliation by a manager against an employee for reporting potential workplace violations. [Under review]

Open Complaints and Investigations – As of April 30, 2025, the Investigation Program is managing a total of 16 open complaints and two open ethics investigations.

Resolved Complaints – Six allegations of potential ethics violations were resolved following preliminary reviews. It took an average of 27 days to review and resolve these matters.

SNAPSHOT for April 2025

Advice Matters

33

Pending Complaints

16

Compliance Assistance

43

Investigations Opened

1

New Complaints Received

6 (78 to date, FY 24-25)

Pending Investigations

2

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.