



Fiscal Year 2025/26 Performance Highlights



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Ethics Officer's
Report



Transparency
Certificate of
Excellence



Ethics Office Quarterly
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Director Fact Sheets



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.



Office of the Ethics Officer

- Report on FY 2025-26 Achievements

Summary

This report highlights Ethics Office achievements for Fiscal Year 2025-26. The Ethics Office successfully administered five core ethics programs, in addition to completing special projects.

For the new Fiscal Year 2026-2027, once the General Manager’s strategic priorities are finalized, I will ensure the Ethics Office programs and special projects are incorporated into Metropolitan’s comprehensive Business Plan, while maintaining Ethics Office independence in ensuring integrity, transparency and accountability.

Detailed Report

This report covers the Ethics Officer’s achievements for Fiscal Year 2025-26, from July 1, 2025 through April 30, 2026.¹ The Ethics Officer’s work centered around the following:

Core Ethics Programs

- Effectively administering Education, Advice, Compliance, Investigations, and Policy Development

Special Projects

- Obtaining Transparency Certificate of Excellence
- Expanding outreach (live ethics training events, ethics newsletters)
- Initiating collaboration in developing an Organizational Code of Conduct
- Performing internal review of ethics policies and procedures

The information below demonstrates achievement of last year’s goals. Due to a leadership transition in the General Manager position, the Ethics Office delayed completion of the organizational Code of Conduct to allow time for input from and collaboration with the General Manager. In light of the new Ethics Committee, the Ethics Officer delayed proposing new ethics rules and procedures to allow time for Committee orientation.

I. Core Ethics Programs

A. Education Program

Education Program highlights:

- Live, in-person *Government Ethics 101* training program for employees

¹ Unless otherwise noted, all data in this report reflects the period of July 1, 2025, through April 30, 2026 (noted in the charts below as “FY 2025-26*”) as compared to last fiscal year which reflected July 1, 2024 through June 17, 2025.

- Ethics rule fact sheets
- Outside legal opinion on inspection trips
- State ethics law updates for directors
- Ethics rule overviews for directors at Committee meetings
- Live ethics orientation sessions for new employees
- Live trainings by workgroup and topic
- 4 quarterly newsletters for workforce

Ethics staff also continued professional ethics education through:

- Council on Governmental Ethics Laws annual conference (two directors and two staff attended)
- Society of Corporate Compliance and Ethics Academy and Annual Conference
- COGEL web-based training sessions
- FPPC web-based trainings
- Association of Workplace Investigators web-based trainings

Key Education Statistics:



B. Advice Program

The Advice Program continued an upward trend from previous years:

- Timely analyzed and responded to 335 advice matters regarding ethics laws and policies (335 as of May 6, 2026)
- Produced conflicts bulletins for Committee/Board items, recusals, and disclosure scripts for directors
- Reviewed conflict of interest disclosure forms submitted by prospective consultants
- Prepared formal requests for advice to the FPPC for directors

Advice Matters by Year:

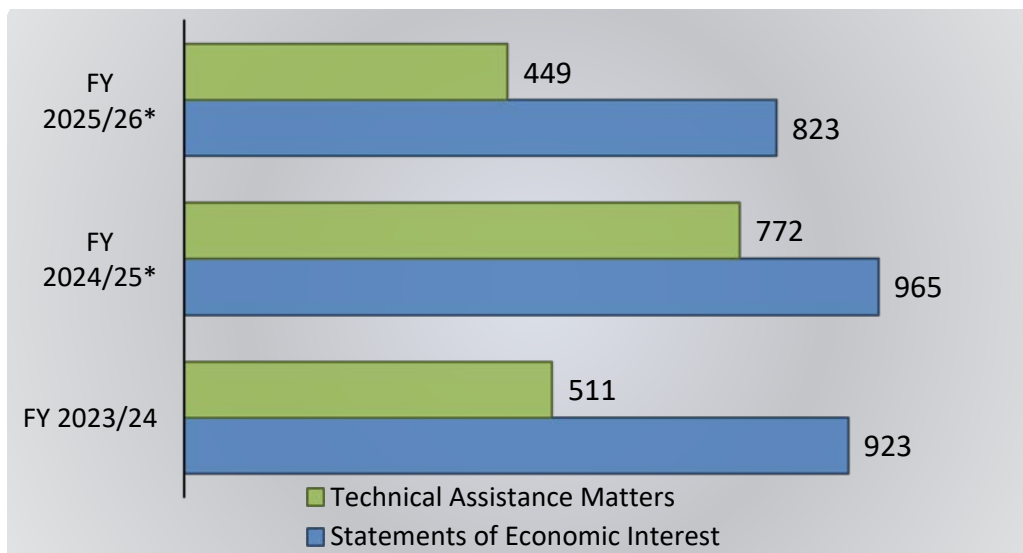


C. Compliance Program

Compliance Program highlights:

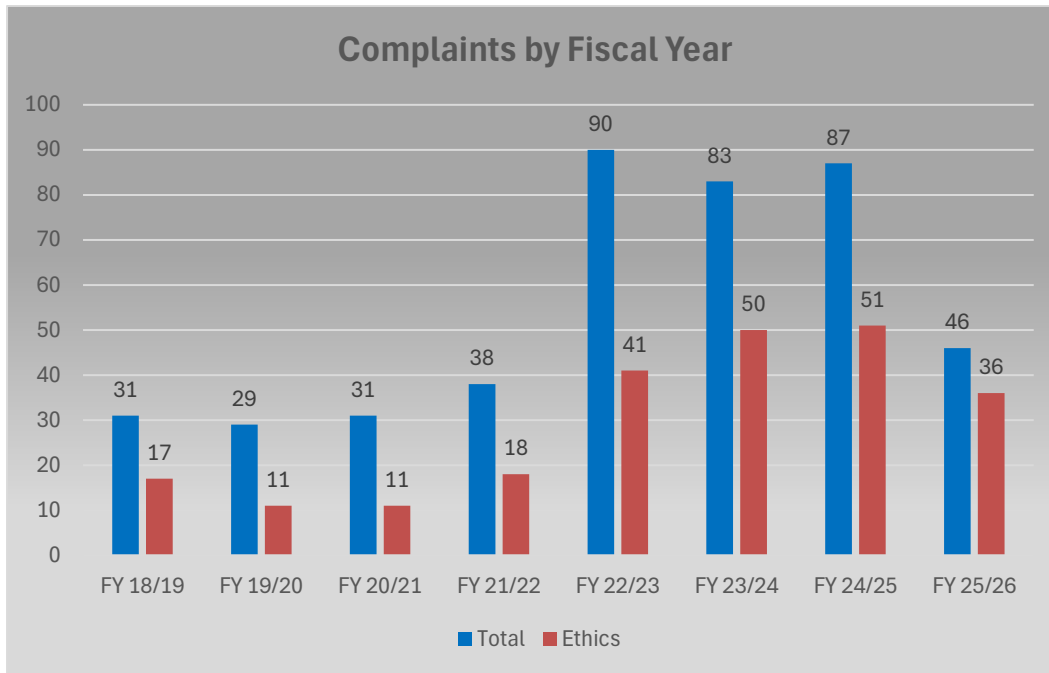
- Served as Metropolitan’s filing officer for 823 Statements of Economic Interest (Form 700)
- Achieved 91% compliance from Form 700 filers to date
- Managed Metropolitan’s compliance with state ethics training requirements (AB 1234)
- Assisted with Form 700 filings, including notifications and e-filing system

Compliance Highlights by Year:

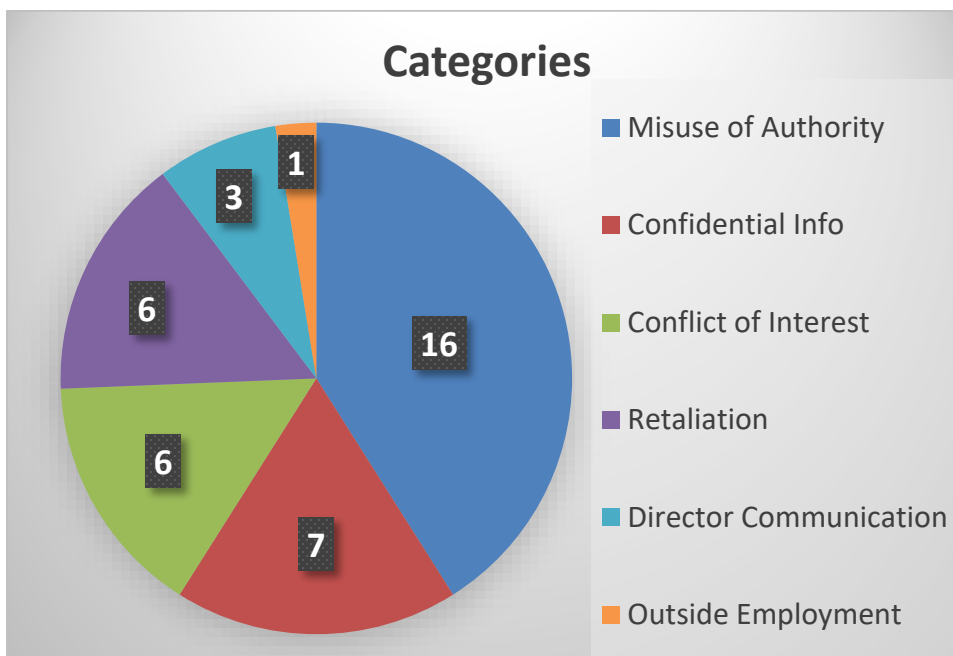


D. Investigations Program

Complaints Received by Fiscal Year (as of 4/30/2026):



Categories – 36 Ethics Complaints Received in FY2026 (as of 4/30/2026):



Status of 36 Ethics Complaints Received in FY2026 (as of 4/30/2026):

- 8 Investigations (3 completed, 5 ongoing)
- 28 Preliminary Reviews (23 completed, 5 ongoing)

E. Policy Development Program

Policy Development Program highlights:

- Surveyed other government ethics agencies to compare ethics rules and procedures
- Reviewed ethics-related Administrative Code and assessed for potential amendment
- Discussed Lobbying Registration and Reporting program with Community and Workplace Culture Committee in preparation for proposed amendment to the program
- Made recommendations for amending operating and other policies from an ethics perspective

II. Special Projects

In addition to our core work, the Ethics Officer completed the following special projects:

- Led collaborative process for Metropolitan to obtain a Transparency Certificate of Excellence from the Special District Leadership Foundation.



- Completed an ethics-related review on Metropolitan’s Sponsorships Process

III. Looking Ahead

Fiscal Year 2026-27

Core Ethics Programs

- Continue to efficiently administer core ethics programs: Education, Advice, Compliance, Investigations, and Policy Development

Special Projects

- Employee Ethics Survey
- Ethics-related Review - Fleet vehicle use policies/procedures
- Propose amendments to ethics rules and procedures for Board approval

IV. Conclusion

Metropolitan's Ethics Office is a protective barrier that maintains public trust in Metropolitan programs and operations. We foster an organizational culture of integrity, transparency, and accountability. Metropolitan consistently brings excellence in everything we do, but even small ethical lapses can tarnish the incredible efforts of our employees, the reputation of our agency, and diminish the public's trust and support for our endeavors.

The Ethics Office administers the board directed ethics program that includes organizational values and rules intended to promote a public official's ability to discharge their duties only with the public's well-being in mind and with uncompromised allegiance to public duty. The Ethics Officer continues to be committed to a collaborative working relationship with leadership, bargaining units, employees, and other stakeholders to promote a culture that encourages ethical conduct and compliance with the law and policies.

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.*

SDLF



SPECIAL DISTRICT
LEADERSHIP FOUNDATION

February 20, 2026

Metropolitan Water District of Southern California
PO Box 54153
Los Angeles, CA 90054

RE: District Transparency Certificate of Excellence Approval

Congratulations Metropolitan Water District of Southern California who has successfully completed the District Transparency Certificate of Excellence program through the Special District Leadership Foundation (SDLF).

On behalf of the SDLF Board of Directors, I would like to congratulate your district on achieving this important certificate. By completing the District Transparency Certificate of Excellence Program, Metropolitan Water District of Southern California has proven its dedication to being fully transparent as well as open and accessible to the public and other stakeholders.

Congratulations and thank you for your dedication to excellence in local government.

Most sincerely,

Sandy Raffelson
-SDLF Board President

Special District Leadership Foundation

The Special District Leadership Foundation (SDLF) was formed to provide certification, accreditation and recognition programs to special district elected officials and staff.



All SDLF programs are dedicated to promoting excellence in special district governance and operations throughout California.

District Transparency Certificate of Excellence

February 2026– March 2029

The Special District Leadership Foundation is proud to present this
District Transparency Certificate of Excellence to

Metropolitan Water District of Southern California

In recognition of the district's completion of all transparency program requirements
designed to promote transparency in their operations and governance
to the public and other stakeholders.

Sandy Seifert Raffelson, SDLF Board President



Neil McCormick, SDLF Chief Executive Officer

ETHICS IN FOCUS

Office of Ethics Quarterly Newsletter



A Message From the General Manager



Fostering and maintaining a strong culture of ethics is at the heart of public service. It is the foundation of the public's trust and belief in what we do.

As one of the leading water agencies in California, we're also representatives of the water industry, which relies upon the full confidence of customers, regulators and lawmakers. A loss in public trust in Metropolitan can result in a loss in public trust in water.

Metropolitan is funded through public dollars.

Taxpayers and ratepayers expect that we will be responsible stewards of their money and that our actions are always in the best interest of the people we serve. Through professionalism and strong ethical standards, we demonstrate that their trust is well placed.

I am committed to ensuring Metropolitan is an environment where employees act with honesty and integrity and feel empowered to speak up if they have questions or concerns. The Ethics Office provides training and guidance to help us all make sound decisions and avoid mistakes on a range of issues such as conflicts of interest and gifts of public funds. In addition to providing practical advice and examples of ethical actions, our Ethics Office can help us navigate more complicated situations, where ethical boundaries may be less clear. I encourage you to use the Ethics Office as a resource.

IN THIS ISSUE

**A MESSAGE FROM GENERAL
MANAGER SHIVAJI
DESHMUKH**

**SPOTLIGHT ON POST-
EMPLOYMENT RULES**

Learn about ethics considerations when leaving public service

**ETHICS PRIMER FOR
EMPLOYEES**

A quick guide to Metropolitan's primary ethics rules

**GOVERNMENT ETHICS IN THE
NEWS**

Read about government ethics cases in the headlines throughout the country

ETHICS COMPLAINT DATA

A dashboard for ethics complaints and investigations

ETHICS OFFICE AT A GLANCE

Contact information, how to report a concern, and more

Spotlight on Post-Employment Rules

Leaving Government Service

When we leave government employment, certain ethics rules apply to help prevent conflicts of interest and to maintain the public's trust in government processes.

When seeking other employment, retiring, or otherwise separating from Metropolitan, we should consider the following:

- Am I actively seeking new work opportunities while still employed by Metropolitan?
- Am I considering working on Metropolitan projects with private firms?
- Do I anticipate needing to communicate with Metropolitan officials on behalf of my new private sector employer?
- Did I participate in a contracting process in my Metropolitan capacity related to my new private sector employer?
- Do I need to file a Form 700 after leaving Metropolitan?
- Do I plan to return to government service?
- Did I receive confidential information in my Metropolitan position?

General Guidance

Keep in mind these ethics considerations:

- We have a conflict of interest in Metropolitan matters involving potential employers and therefore need to avoid participating in such matters.
- After leaving Metropolitan, we may have a continuing conflict of interest in contracts we participated in while employed at Metropolitan.
- Confidential information obtained in our Metropolitan capacity must remain confidential after leaving Metropolitan.
- Form 700 filers must file a Leaving Office Form 700.
- Former employees are subject to a one-year "cooling off" period that restricts certain communications with Metropolitan officials on behalf of new employers.

Ethics Checklist for Leaving Metropolitan Service

- ✓ Avoid conflicts of interest involving potential employers.
- ✓ Avoid employment discussions and negotiations with contractors/entities involved in your Metropolitan work.
- ✓ Preserve confidential information during and after Metropolitan employment.
- ✓ File a Leaving Office Form 700 (applies to Form 700 filers only).
- ✓ Review Post-Employment Lobbying Rule (Admin. Code section 7221).
- ✓ Seek advice from the Ethics Office.

Checklist for Engaging with Former Metropolitan Employees

- ✓ Be mindful of former employees' "cooling off" period – help ensure they observe post-employment lobbying restrictions.
- ✓ Ensure that Metropolitan contracts and other matters involving former employees follow standard processes to avoid actual and perceived favoritism.
- ✓ Disclose personal relationships with former employees if asked to evaluate them as part of an RFQ evaluation process.
- ✓ Avoid sharing confidential information with former employees.

Ethics Primer for Employees

Below is a summary of the primary ethics rules at Metropolitan applicable to employees. Limited exceptions may apply. To read the rules in full, see Admin Code Division VII. Contact our office with questions about the rules and how they may apply in specific situations.

Misuse of Position or Authority

Rule: Employees may not misuse their government position or authority to benefit themselves or others, or to disadvantage others.

Key: Remain mindful that we serve in government positions, take an oath, and must act in the public's best interest, not in anyone's personal interest.

Examples of Misuse: Using Metropolitan funds for a personal benefit, steering Metropolitan contracts to friends, and performing outside work on Metropolitan time.

Conflicts of Interest

Rule: Employees may not participate in Metropolitan matters or actions involving their personal financial interests.

Key: Examples of personal financial interests include sources of income to employees and their spouses, companies in which they own stock, sources of large gifts, and real property.

Example of a Conflict: Participating in staff discussions about a Metropolitan contractor in which the employee owns stock. Instead, the employee should not participate and seek Ethics Office advice.

Gifts and Honoraria

Rule: Gifts from "restricted sources" are prohibited.

Key: "Restricted sources" include contractors, vendors, and those seeking contracts or funding from Metropolitan (including nonprofits). "Gifts" include meals, tickets, travel payments, holiday baskets, etc.

Rule: Gifts from third parties as a "thank you" for performing a work-related duty or act are prohibited.

Rule: Form 700 filers must report certain gifts of \$50 or more.

Rule: Form 700 filers may not accept payment (honoraria) from reportable sources for giving speeches, serving on panels, and related activities.

Outside Employment

Rule: Outside employment with Metropolitan contractors or with a person or entity seeking a Metropolitan contract, within the employee's department or scope of work, is prohibited.

Rule: Employees also may not recommend that such a person or entity hire a relative.

Influencing Prospective Employment

Employees may not participate in Metropolitan matters involving persons or entities with whom they are negotiating or discussing future employment.

Political Activities

Rule: Political activities may not take place on Metropolitan property, on Metropolitan time, or using Metropolitan resources, the agency seal, or email accounts.

Rule: Employees must disclose their election to public elective office to the Ethics Officer and General Manager.

Post-Employment Lobbying

For one year after leaving Metropolitan, former employees may not communicate with Metropolitan officials about matters they were involved in during their last three years at Metropolitan.

Confidentiality

Employees must not use or disclose confidential or privileged information unless authorized by the proper authority or required by law/policy.

Duty to Report

Managers must report potential ethics violations to the Ethics Officer.

Financial Disclosure

Employees required to file Form 700 must file timely, accurate financial disclosure reports.

Retaliation

Rule: Retaliation for reporting potential workplace violations of law or policy, or for cooperating with investigations, is prohibited.

Rule: Discouraging others from reporting these concerns is also prohibited.

Government Ethics In the News

County of Los Angeles – The LA District Attorney filed felony charges against an LAUSD information technology employee and a technology vendor owner in connection with an alleged scheme to steer over \$22 million in LAUSD contracts to the vendor. The LAUSD employee is accused of illegally participating in the vendor’s contracting process while receiving over \$3 million in kickbacks. Arrest warrants were issued, and each faces up to 7 years of incarceration.

The District Attorney also charged an LAPD officer with felony insurance fraud for allegedly skydiving while on disability leave. The officer faces up to 6 years of incarceration.

City of Los Angeles – The Los Angeles City Ethics Commission determined that a Los Angeles City Council Aide failed to file a Form 700 financial disclosure form on time and failed to disclose their political and lobbying consulting firm and its clients. Fine: \$25,000

City of San Francisco – The San Francisco City Ethics Commission determined that an Information Technology employee accepted numerous gifts from restricted sources and used City resources for personal gain. In part, the employee created false City email accounts to register for and attend hundreds of webinars unrelated to their City duties and collected related incentives including gift cards, alcohol, travel credits, and more. They also misrepresented their City position to gain entry into City sporting events hosted by IT firms seeking business with their City department. Fine: \$42,611.

City of New York – A former New York City Mayor’s aide pleaded not guilty to criminal bribery and fraud charges stemming from an alleged misuse of his authority as a public official. The official is accused of pressuring other government officials to award contracts to a security company, steering public funds to a particular company, and accepting \$16,000 in bribes and kickbacks.

Ethics Office Complaint & Investigation Information

To balance transparency and privacy rights of public employees, the Ethics Office provides generalized ethics complaint and investigation information to the Board of Directors and employees.

While ethics complaints are confidential, this general overview sheds some light on concerns reported to the Ethics Office.

Investigation procedures are available in Administrative Code sections 7400 – 7433.

Quarterly Details

COMPLAINTS

TOTAL COMPLAINTS RECEIVED: 9

ETHICS COMPLAINTS RECEIVED: 8

STATUS OF 8 ETHICS COMPLAINTS:

UNDER REVIEW: 2

CLOSED AFTER REVIEW: 5

INVESTIGATIONS OPENED: 1

TYPES OF ETHICS ALLEGATIONS:

MISUSE OF AUTHORITY: 5

CONFLICTS OF INTEREST: 1

DISCLOSURE OF CONFIDENTIAL INFO: 1

RETALIATION: 1

NO. OF ALL OPEN ETHICS COMPLAINTS AND INVESTIGATIONS (AS OF MARCH 31):

COMPLAINTS: 5

INVESTIGATIONS: 7

ETHICS OFFICE AT A GLANCE

Contact Us!

Phone: (213) 217-5832

Email: EthicsOffice@mwdh2o.com

Anonymous Reporting Line:

(800) 461-9330

<http://www.mwdethicshotline.net/>

CORE PROGRAMS

- Education
- Advice
- Policy Development
- Compliance
- Investigations



ETHICS RULES

| | |
|-----------------------|----------------------------------|
| Conflicts of Interest | Financial Disclosure |
| Contractor Gift Ban | Lobbying |
| Outside Employment | Misuse of Authority |
| Political Activities | Confidentiality Requirements |
| Retaliation | Duty to Report Ethics Violations |
| Revolving Door | Contracting Compliance |

...and More (see Admin Code Division VII for all ethics rules)

LEARN MORE!

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ETHICS OFFICE INTRAMET PAGE

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ETHICS IN FOCUS

Office of Ethics Quarterly Newsletter



A Message From the Ethics Officer

This quarter, Metropolitan began its leadership transition and introduced Shivaji Deshmukh as general manager. I welcome Shivaji to Metropolitan and look forward to working with him to help ensure the public's trust in Metropolitan's officials and decision-making through a workplace culture rooted in integrity.

In December, I attended the Council on Governmental Ethics Laws Annual Conference. Directors Tana McCoy and Jacque McMillan attended and lent meaningful insights to the discussions. The Ethics Office is dedicated to ensuring Metropolitan remains at the forefront of governmental ethics.

As we begin a new year, the Ethics Office remains committed to the foundational mandates of its enabling legislation, Senate Bill 60, including: 1) Operating as an independent entity that is not subject to political influence; 2) Proposing rules applicable to directors and employees relating to conflicts of interest, lobbying, disclosure, and ethics consistent with the intent and spirit of the laws of the Fair Political Practices Commission and other local ethics agencies; and 3) Investigating complaints alleging violations of those ethics rules.

Thank you for the excellent work you do every day and for continuing to contact us with your questions about government ethics rules.

Abel Salim

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A MESSAGE FROM THE ETHICS OFFICER

SPOTLIGHT ON ANNUAL ETHICS CONFERENCE
2025 COGEL Conference
recap

ETHICS REMINDERS
Training requirements, filing deadlines, and resources

FINANCIAL DISCLOSURE
A refresher on Form 700 requirements for filers

GOVERNMENT ETHICS IN THE NEWS
Ethics updates and cases from local government

ETHICS COMPLAINT DATA
A quarterly dashboard for ethics complaints and investigations

ETHICS OFFICE AT A GLANCE
Contact information, how to report a concern, and more

Annual Government Ethics Conference

Council on Governmental Ethics Laws Annual Conference

The Council on Governmental Ethics Laws (COGEL) is the foremost non-governmental organization dedicated to government ethics. COGEL's mission is to support and improve accountable governments worldwide by enhancing the professional development of its membership through education, knowledge sharing, and thought leadership in government ethics.

Metropolitan's Ethics Office staff have long participated in COGEL through panels, COGEL committees, conferences, and continuing ethics education throughout the year.

The COGEL Conference brings together government ethics professionals from around the world to facilitate and promote the exchange of information on government ethics. In December, two Metropolitan Directors, the Ethics Officer, and a Senior Deputy Ethics Officer attended the COGEL Conference in Atlanta. Guest speakers included Georgia Governor Brian Kemp and White House whistleblower Tricia Newbold.

The conference provided unique opportunities to engage with our local ethics network including the Fair Political Practices Commission, Los Angeles City Ethics Commission, Anaheim Ethics Office, and LA Metro Ethics Office. Sessions included:

- ✓ *Independence Under Fire: How to Protect Ethics Commissions from Political Interference*
- ✓ *Adjusting to Changing Times While Holding True to Unchanging Principles*
- ✓ *Navigating Employment Investigations: The Intersections of Privacy, Public Access and Transparency, and Ethical Considerations*
- ✓ *Perilous Procurements: Ethics Guardrails for Public Contracts*
- ✓ *Ethics Updates I, II*
- ✓ *Join us in the Lobby: Lobby Law Hot Topics, Innovations, and Challenges*
- ✓ *Grow, Inform, and Establish Trust: Strategies to Build Awareness of Your Organization's Mission*



Director Tana McCoy with Ethics Officer Abel Salinas at the 2025 COGEL Conference

Director Tana McCoy reflected on attending her first COGEL Conference:

"It was my pleasure to attend the COGEL conference Dec 7 - 10, 2025. I, along with Director Jacque McMillan, attended various workshops. These workshops gave me a clearer understanding of the role of the Ethics Office. Further, several workshops included in-depth discussions about the difference between "unethical" and "illegal". I believe that my attendance provided much-needed information to assist me with chairing the Community and Workplace Culture Committee. Thank you to the Ethics Office for the inclusion."



In Independence Under Fire, government ethics leaders and scholars discussed recent efforts to weaken governmental ethics programs and offices through political pressure and outside influence, and strategies to protect and preserve independent oversight.

Ethics Reminders: First Quarter 2026

Form 700 Filers

ANNUAL FORM 700 DUE APRIL 1, 2026

Form 700 Resources and Assistance –

Ethics Office:

Form 700 trainings by request, one-on-one advice sessions, a Form 700 guide, and technical assistance with the Form 700 electronic filing system.

Fair Political Practices Commission (FPPC):

Advice, online trainings, and fact sheets.

<https://www.fppc.ca.gov/>

AB 1234 STATE ETHICS TRAINING

All Form 700 filers are now required to take AB 1234 state ethics training. Filers who were not previously required to take AB 1234 training must complete their initial training by May 12, 2026. Thereafter, training is every two years.

AB 1234 Resources and Assistance –

Ethics Office: Training notifications, instructions, technical assistance with obtaining training credit.

Form 700 E-Filing System: Find your individual training deadline and upload your training certificate here.

Training Link: <https://localethics.fppc.ca.gov/login.aspx>

All Employees

GOVERNMENT ETHICS 101 TRAINING

All Metropolitan employees are required to take ethics training on Metropolitan's internal ethics rules every two years. Training dates are being coordinated with managers.

How to Comply: Ethics Education staff is providing live, in-person Government Ethics 101 trainings on site. Please sign in upon arrival. The sign-in sheet is proof of compliance.

Financial Disclosure Refresher (Form 700)

Employees in certain positions are required to report personal financial interests on a state form commonly known as Form 700.

Employees not currently required to file Form 700 may be required in the future if they promote or transfer into another position. About 800 employees must file Form 700. The Annual filing is due **April 1, 2026**.

While employees' individual disclosure requirements depend on their job duties and personal interests, below are some basic reminders for all filers:

COMMON FINANCIAL INTERESTS:

- **Gifts** (meals, tickets, gift cards, etc.)
- **Investments** valued at \$2,000 or more at any time during the reporting period (stocks, trusts, business ownership, etc.)
- **Income, Loans, and Business Positions** (salary, commissions, rental income, job positions, clients, personal loans, etc.)
- **Travel Payments** (third party payments for lodging, airfare, travel reimbursements, etc.)
- **Real property** (property ownership, leasehold interest, etc.)

FILING TIPS:

- Disclosure requirements for your position are described in the disclosure categories assigned to your position:
<https://intramet.mwd.h2o/Ethics/COI%20Code%202022.pdf>
- Report the financial interests listed above if they involve the types of interests described in your disclosure categories
- Remember to consider your spouse or domestic partner's financial interests
- File electronically at:
<https://www.southtechhosting.com/MWD/eDisclosure/>

Government Ethics In the News

City of Los Angeles – In December, the LA City Ethics Commission fined a sitting Los Angeles City Councilmember for ten City ethics violations that occurred when the Councilmember previously served as Chief of Staff to a former Councilmember. The Commission concluded that the Councilmember accepted multiple excess gifts from a developer and other businessperson, failed to disclose the gifts, misused their City position on four occasions, and aided and abetted the former Councilmember in misusing their City position. Fine: \$138,124.

In October, the Commission also concluded that a Structural Engineering Associate misused their City position and City resources for personal benefit on City time. On multiple occasions, the City employee pitched the installation of their outside employer's product (cell phone charging stations) to various City officials for use on City premises. The employee was found to have misused their City contacts, connections, email account, and time for personal benefit. Fine: \$7,500.

Riverside County – A grand jury reportedly indicted Coachella's Mayor on nine counts including felony conflict of interest and perjury. The Mayor also faces charges related to disclosures of financial interests on Form 700. It is alleged that the Mayor participated in a public contract in which he had a financial interest. The Mayor has pleaded not guilty to the charges. If convicted, charges carry more than seven years in prison and a lifetime ban from public service.

City of San Francisco – The Assistant Director of Finance and Technology in the City's Workers' Compensation department was sentenced to three years in prison for seven felony counts of public corruption. The City employee, responsible for ensuring the financial integrity of the City's Workers compensation Division, registered a fake company as a City vendor and billed auditing services never performed, engaging in a complex scheme that defrauded the City Workers Compensation division of over \$600,000.

Ethics Complaints and Investigations Data

To balance transparency and privacy rights of public officials, the Ethics Office provides generalized ethics complaint and investigation information to the Board of Directors and employees. While Ethics complaints are confidential, we hope this general overview sheds some light on ethics-related concerns brought to our office.

QUARTERLY STATS

NO. OF ETHICS COMPLAINTS RECEIVED: 6

STATUS OF 6 ETHICS COMPLAINTS RECEIVED



TYPES OF ETHICS ALLEGATIONS:

- Misuse of Authority (4)
- Conflicts of Interest (2)
- Prohibited Director Communication (1)

*Complaints may include more than one allegation type.

CURRENT TOTALS

NO. OF ALL OPEN ETHICS COMPLAINTS AND INVESTIGATIONS (AS OF DECEMBER 30):

OPEN ETHICS COMPLAINTS – 8

OPEN ETHICS INVESTIGATIONS – 3

ETHICS OFFICE AT A GLANCE

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CORE PROGRAMS

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...and More (see Admin Code Division VII for all ethics rules)

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ETHICS IN FOCUS

Office of Ethics Quarterly Newsletter



A Message From the Ethics Officer

This quarter, I presented the Ethics Office’s strategic goals for the new fiscal year to the Community and Workplace Culture Committee. Among my objectives are developing an organizational Code of Conduct in collaboration with the new General Manager, General Counsel, and General Auditor and reviewing ethics rules and procedures for potential updates.

As we look to consider an organizational Code of Conduct and amendments to Division VII of the Administrative Code, I welcome your feedback and ideas on how these provisions can help further shape and foster an ethical culture at Metropolitan.



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SPOTLIGHT ON CONFERENCES

Learn about ethics considerations when attending conferences.

GOVERNMENT ETHICS IN THE NEWS

Ethics updates and cases from state and local government.

ETHICS COMPLAINT DATA

A new quarterly dashboard for ethics complaints and investigations.

ETHICS OFFICE AT A GLANCE

Contact information, how to report a concern, and more



Spotlight on Conferences

Society of Corporate Compliance and Ethics (SCCE) Conference

Ethics Office staff attended the SCCE Annual Conference this quarter. The SCCE supports ethics and compliance professionals with education, certification, networking opportunities and other resources related to the field.

Sessions included:

- ✓ Elements of an Effective Conflicts of Interest Program
- ✓ Learning and Engagement in the Age of Distraction
- ✓ How to Refresh your Code of Conduct, Provide Data to your Board, and Engage with Employees
- ✓ Refreshing the Ethics & Compliance Brand
- ✓ Presenting to Boards and other Senior Stakeholders Using Data and Storytelling
- ✓ Building Resilience in your Investigative Team
- ✓ Translating Law into Compliance

We look forward to bringing new resources and approaches to our program, including:

- ✓ Providing complaint and investigation data to workforce
- ✓ Ethics FAQ
- ✓ Varied live sessions
- ✓ Ethics Day at Metropolitan
- ✓ Developing an organizational Code of Conduct

Ethics Considerations

Conferences can be a valuable resource for Metropolitan officials. They can also raise ethics challenges we can help you navigate. When attending conferences, please be mindful of common ethics considerations:

Gifts offered by third parties:

- Free meals/events
- Swag/giveaways
- Travel payments
- Free or discounted registration

Confidentiality:

- Remember to preserve confidentiality when discussing your work with peers.

Q&A:

Q 1 – Vendor X invites you to their conference and offers to pay for your travel. Can you accept?

A – No. Metropolitan’s ban on vendor gifts – and other state gift laws and rules – applies.

Q 2 – Before arriving at a conference, a company invites you to a free dinner they’re hosting at the conference. Okay to accept?

A: No. Gifts from vendors and contractors seeking Metropolitan work and pitching products are prohibited.

Q 3 – At a conference, you attend a vendor fair. Vendors are offering giveaways such as pens, mugs, hats, and other nominal items branded with their company logo. Okay to accept?

A – Small, branded items are generally okay to accept. If a giveaway might be of greater value than these items, call for advice.

Q 4 – MWD paid for the conference fee; the fee includes lunch for everyone each day. Okay to accept?

A – Yes, enjoy!



From left: Senior Deputy Ethics Officer Kelli Shope, Ethics Officer Abel Salinas, and Senior Administrative Analyst Hilda Rodriguez

Questions?

Contact the Ethics Office: EthicsOffice@mwdh2o.com

Government Ethics In the News

Federal Government – In July, the United States Office of Government Ethics (OGE) completed its annual survey of conflict of interest cases. The OGE featured 11 cases involving federal government employees. Cases involved employees steering contracts to entities in which they had a financial interest and failing to file financial disclosure reports. The employees faced a range of civil and criminal penalties. For more information:

<https://www.oge.gov/>

State Government – The California Fair Political Practices Commission (FPPC) advises public officials on their ethical obligations under state law. Among advice letters this quarter, the FPPC advised that a former Port District official may not serve as attorney for a developer post-government service, where the official previously participated in the developer’s contract with the Port District in their capacity as a Port District official.

Los Angeles County – In August, the Los Angeles County District Attorney’s Office filed two new public corruption charges against a Los Angeles City Council member. It is alleged that the Council member had a conflict of interest in contracts he participated in as a Council member. The Council member pleaded not guilty to the new charges, which added to ten prior charges including embezzlement and conflict of interest. The prior charges included perjury for failing to disclose a financial interest on Form 700 and participating in City matters involving his spouse. A preliminary hearing was set for November 3.

Los Angeles City – In August, the LA City Ethics Commission concluded that a City department inspector misused their government position by submitting timesheets that falsely indicated hours worked. Specifically, the inspector was found to have left work early without authorization, engaged in non-work activities during work hours, submitted inspection records reflecting inspections completed that were not, and submitted timesheets falsely reflecting full work days. Fine: \$16,250.

Ethics Complaints and Investigations Data

The Ethics Office regularly reports generalized ethics complaint and investigation information to the Board of Directors. This issue, we are sharing data with employees as well. Ethics complaints are confidential, but we hope this general overview sheds some light on ethics concerns brought to our office.

QUARTERLY STATS

NO. OF ETHICS COMPLAINTS RECEIVED: 18

STATUS OF 18 ETHICS COMPLAINTS RECEIVED



TYPES OF ETHICS ALLEGATIONS:

- Misuse of Authority (5)
- Disclosure of Confidential Information (5)
- Retaliation (3)
- Conflicts of Interest (3)
- Prohibited Director Communication (2)
- Outside Employment (1)

*Complaints may include more than one allegation type.

CURRENT TOTALS

NO. OF ALL OPEN ETHICS COMPLAINTS AND INVESTIGATIONS (AS OF SEPTEMBER 30):

OPEN ETHICS COMPLAINTS – 10

OPEN ETHICS INVESTIGATIONS – 5

ETHICS OFFICE AT A GLANCE

Contact Us!

Phone: (213) 217-5832

Email: EthicsOffice@mwdh2o.com

Anonymous Reporting Line:

(800) 461-9330

<http://www.mwdethicshotline.net/>

CORE PROGRAMS

- Education
- Advice
- Policy Development
- Compliance
- Investigations



ETHICS POLICIES

| | |
|-----------------------|----------------------------------|
| Conflicts of Interest | Financial Disclosure |
| Contractor Gift Ban | Lobbying |
| Outside Employment | Misuse of Authority |
| Political Activities | Confidentiality Requirements |
| Retaliation | Duty to Report Ethics Violations |
| Revolving Door | Contracting Compliance |

...and More (see Admin Code Division VII for all ethics policies)

LEARN MORE!

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



ETHICS IN FOCUS

Office of Ethics Quarterly Newsletter



Union Station Courtyard

A Message From the Ethics Officer

Abel Salinas

This fiscal year, the Ethics Office looks forward to engaging with the workforce in new ways. At the June Community and Workplace Culture (CWC) Committee, I presented my annual business plan which includes additional education goals. For example, we plan to offer more ethics training sessions tailored to specific workgroups. These tailored sessions allow an opportunity for workgroups to hear about ethics issues most likely to arise in their specific roles at Metropolitan and share ideas for preventing ethical missteps. We hope that more workgroups will consider participating in these collaborative sessions. Working together provides the best path for ensuring an ethical culture at Metropolitan and helping all employees avoid inadvertent ethics violations.

This issue features the final two ethics policies requested by employees in the 2024 Ethics survey: financial disclosure and misuse of confidential information. We will continue to highlight other ethics policies and laws in future issues and welcome your input. Finally, I want to thank CWC Committee Chair Tana McCoy for contributing to this issue. Chair McCoy's extensive public service experience helps guide and shape programs directly impacting the workforce and public, including the Ethics Office. We appreciate her leadership, dedication to public service and ethics, and commitment to fostering a strong organizational culture at Metropolitan.

IN THIS ISSUE

**MESSAGE FROM CWC
COMMITTEE CHAIR**

ETHICS POLICY SPOTLIGHT
Financial disclosure and
unauthorized disclosure of
confidential information

ETHICS IN THE NEWS
Ethics updates from state and
local government

ETHICS & SAFETY

ETHICS OFFICE AT A GLANCE

A Message from Community and Workplace Culture Committee Chair Tana McCoy



I was honored to accept the role of Chair of the Community and Workplace Culture (CWC) Committee earlier this year. Because the CWC Committee addresses issues directly impacting employees and workplace culture, I wanted to introduce myself and the Committee's work to the Metropolitan workforce. The CWC Committee has responsibilities over Metropolitan's Ethics, EEO, and DEI Offices. Each of these offices plays a foundational role in promoting and ensuring a fair, just, and thriving workplace culture for all employees. I encourage you to engage with these offices as you carry out your official duties for the public.

Like you, I am a public servant and greatly value the various government capacities I've served in, including 40 years as a City of Compton employee. I was later appointed to the Metropolitan Board of Directors and elected to the Compton City Council. Before serving in each role, I took the same oath you took when you joined Metropolitan. Each of us pledged to support and defend the Constitutions of the United States and California and to faithfully discharge our official duties. I take great pride in serving the public and take to heart the distinct ethical obligations of public service.

As government officials, we are all subject to various government ethics laws and internal ethics policies. These provisions are intended to help preserve the public's trust in their government by fostering an organizational culture rooted in integrity. Ethical decision-making is not only the right thing to do as stewards of the public trust, but it is also linked to the success of any governmental body. Even relatively small ethical lapses can jeopardize the public's trust in their government, which in turn can jeopardize public support for an agency's policies, initiatives, and vision.

Metropolitan's Ethics Office helps raise awareness of the ethical obligations of public service and promotes an ethical workplace culture. They offer training, provide ethics advice, and receive ethics-related concerns. I hope you will use the Ethics Office as a resource to learn more about government ethics. Working together to meet the ethical obligations of public service will help give our Southern California residents a government they deserve and help maintain their faith in the innovative, excellent work each of you performs every day.

Thank you for your service. Together we can make a difference.

Tana McCoy

Financial Disclosure

State law and Metropolitan policy require certain employees to disclose personal financial interests on a public document known as Form 700. These employees (called “Form 700 filers”) also have state gift limits and additional ethics training requirements. Below are frequently asked questions about Form 700.

1. Who Must File Form 700?

Approximately 800 Metropolitan employees file Form 700. The list of Form 700 filing positions is in Metropolitan’s Conflict of Interest Code (COI Code) on the Ethics Office’s IntraMet page.

2. What Interests do Form 700 Filers Need to Report?

The COI Code includes a list of disclosure categories assigned to each Metropolitan filing position. The disclosure categories describe what types of financial interests must be reported for each position. Example: Engineers generally must disclose stock, income, and spousal interests in engineering-related companies.

3. What is the Purpose of Form 700?

Form 700 helps government officials stay mindful of the personal financial interests most likely to create conflicts of interest in their Metropolitan work. Form 700 also provides transparency to the public.

4. Will I Need to File Form 700 in the Future?

If you are not currently a Form 700 filer but change positions, review the COI Code to see if your new position is listed as a filing position. The Ethics Office also notifies new Form 700 filers once we are informed of changes in positions.

5. Is There a Training for Form 700 Filers?

A Form 700 overview is available on the Ethics Office IntraMet page under the “Ethics Training Library” tab. In addition, as of May 2025, all Form 700 filers must take two hours of state ethics training. Filers will be notified with information on how to meet the new training requirement.

The Ethics Office regularly advises and educates on Form 700 requirements. Filers may contact us with questions about their specific filing requirements or about using the e-filing system.

Unauthorized Disclosure of Confidential Information

In the course of our work, we may encounter confidential information. It is important to be vigilant about maintaining confidentiality and only disclosing when authorized or required.

The importance of maintaining confidentiality is reinforced through an ethics policy. The policy generally states that Metropolitan officials at all levels must not disclose confidential information unless authorized or required to do so by law or policy.

Examples of Confidential Information:

- Personnel records
- Medical information
- Privileged attorney-client communications
- Information obtained in closed session board or committee meetings

Compliance Tips:

- Seek advice from an authorized supervisor if unsure whether you are authorized to disclose confidential information in a particular situation.
- If authorized to use AI in your work, be sure to not disclose confidential information.
- Do not share medical information you learn about colleagues.
- Do not disclose attorney-client privileged information unless authorized.
- Information learned in Board and Committee meeting closed sessions must not be shared.

To Learn More:

See Administrative Code section 7126.

Questions?

Contact the Ethics Office
EthicsOffice@mdwh2o.com

Ethics In the News

Federal, State, and Local Ethics Agencies – Federal, state, and local government ethics agencies administer independent ethics programs to foster public trust by helping to ensure that public officials in all levels of government carry out their duties with integrity.

In cities and governmental bodies throughout California, ethics commissions and offices administer local ethics programs which often include ethics laws and policies beyond those at the state level.

State Ethics News – This quarter, the California Fair Political Practices Commission (FPPC) determined that a public official violated California’s conflict of interest law by participating in agency contract decisions involving an entity that was a source of income to her. Fine: \$4,000. In another case, the FPPC found that a public official participated in an agency contract decision involving a company in which he held stock. Fine: \$4,500.

The FPPC also fined multiple public officials for late or inaccurate disclosures on Form 700. Fines: From \$200 to \$18,000.

Los Angeles County Ethics News – In May, the Los Angeles County District Attorney’s Office announced six felony charges against the chief security officer of a local county agency for violations including failing to disclose a conflict of interest and perjury. Specifically, the Chief Security Officer failed to disclose his personal business that sold software products and provided technical services to his agency. The employee could face over six years in prison. His employing agency also filed suit against him. The LA DA is still investigating this matter.

Los Angeles City Ethics News – In April, the LA City Ethics Commission fined a former LA City Council Member for five violations of the City’s governmental ethics ordinance. The Council Member participated in City decisions involving entities that were sources of income to him (conflict of interest) and failed to properly disclose income from one of the entities on Form 700. Fine: \$18,750.

Ethics and Safety

This June, the Ethics Office participated in Metropolitan’s Safety Month programs at Gene Camp, Iron Mountain, Weymouth, and Lake Mathews.

Ethics Officer Abel Salinas and Ethics Educator Hiroshi Ishikawa spoke with employees about their work experiences, safety considerations, the benefits of a speak up culture, and Metropolitan’s retaliation policy.

At Weymouth and Lake Mathews, the Ethics Office also launched its new, live *Government Ethics 101* training program.



Ethics Officer Abel Salinas and Ethics Educator Hiroshi Ishikawa, Gene Camp June 2025

ETHICS OFFICE AT A GLANCE

Contact Us!

Phone: (213) 217-5832

Email: EthicsOffice@mwdh2o.com

Anonymous Reporting Line:

(800) 461-9330

<http://www.mwdethicshotline.net/>

CORE PROGRAMS

- Education
- Advice
- Policy Development
- Compliance
- Investigations



ETHICS POLICIES

| | |
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| Conflicts of Interest | Financial Disclosure |
| Contractor Gift Ban | Lobbying |
| Outside Employment | Misuse of Authority |
| Political Activities | Confidentiality Requirements |
| Retaliation | Duty to Report Ethics Violations |
| Revolving Door | Contracting Compliance |

...and More (see Admin Code Division VII for all ethics policies)

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Misuse of Position or Authority Fact Sheet

Misuse of Governmental Authority or Position Rule

Administrative Code § 7121 states that:

Metropolitan officials shall not misuse their governmental position or authority to obtain, or attempt to obtain, a private benefit, or advantage for themselves or any other individual or entity, or a disadvantage for any other individual or entity.

This rule:

- Applies to Metropolitan officials at all levels.
- Reinforces how to properly use the governmental authority officials are entrusted with.
- Highlights the foundational obligations of public service.

Misuse versus Proper Use

A misuse of governmental authority or position generally is:

- Intentional in nature or
- Carried out with reckless disregard for policies, laws, or other standards.

Benefits that arise due to the misuse of authority or position are distinguishable from benefits that arise from the proper use of authority or position.

Example: A manager promoting an unqualified candidate because they are friends is a misuse. A manager promoting a qualified employee through the proper promotional process is not a misuse.

Consequences of Misuses

The consequences of Metropolitan officials misusing their authority can include (but are not limited to):

- Disciplinary action against the official.
- Loss of public trust, reputational harm.
- Diminished workplace morale.
- Increased potential for litigation.
- Harm to the integrity of district processes.
- In certain cases, criminal prosecution.

Local Misuse Cases

- A City official misused their position by providing software licenses at City expense to themselves and a family member and misappropriating City computer equipment for personal use.
- A City official misused their position by pressuring an organization to purchase their personal business's promotional products in exchange for a better relationship with their City department.

Key Takeaways

To avoid perceived and actual misuse of authority:

- Carry out official duties observing policies, rules, laws, and other applicable requirements.
- Ensure that official actions are carried out in the public's best interest, not in the private interest of self, another person, or an entity.
- Avoid using government positions and authority for self-dealing, personal, or political purposes.

Questions? Contact the Ethics Office:
EthicsOffice@mwdh2o.com



Lobbying of MWD Officials - Fact Sheet

Who is Subject to Metropolitan's Lobbying Rules?

Lobbyists: "Lobbyists" are individuals who receive, or are entitled to receive, \$2,000 or more in a calendar month to communicate directly with a Metropolitan official for the purpose of influencing a specific decision of any Metropolitan official, including a decision to enter into a contract.

Lobbying firms: "Lobbying firms" are 1) business entities, including individual contract lobbyists, that receive compensation for the purpose of influencing a specific decision of any Metropolitan official including a decision to enter into a contract, and 2) owners or employees of the business entity is a lobbyist.

Exceptions to Lobbying Rules

The following activities and individuals are not covered by this policy:

- Oral statements at a public hearing and written statements made as part of the public record.
- Individuals employed by, retained by, or holding office with government agencies.
- Employees of private entities [other than lobbying firms], including non-profits, seeking to influence a Metropolitan decision. [*External lobbyists retained to advocate *on behalf of* these entities are covered by this policy].
- "Decisions" involving ministerial acts, personnel matters, and collective bargaining.

Registration Requirements

Lobbyists must file a registration statement with the Ethics Officer prior to communicating with a Metropolitan official for the purpose of influencing a decision of a Metropolitan official. Lobbying firms must file a registration statement with the Ethics Officer when the firm's lobbyist registers.

*Registration is free.

Disclosure Requirements

- ✓ **Registration statements must include:** Lobbyist/firm name, contact information, the entity employing the lobbying firm, and other information prescribed by the form.
- ✓ **Quarterly reports must include:** Lobbyist/firm name, topics the lobbyist attempted to influence, board members or staff they communicated with, client name, and other information prescribed by the form.
- ✓ **Termination statements:** Lobbyists/firms must file a termination statement once they have ceased lobbying.

Completed lobbying filings are posted on Metropolitan's website.

Questions?

MWDLobbyistRegistration@mwdh2o.com
(213) 217 – 5832

Registration and Reporting Forms:

<https://www.mwdh2o.com/management/ethics-officer/>



Political Activities - Fact Sheet (Directors)

Political Activities Defined

“Political activities” generally refers to activities supporting or opposing a political candidate, party, or committee, partisan activities, etc.

Examples: 1) Soliciting or accepting political campaign contributions or 2) creating/distributing political communications.

Applicable Metropolitan Rules

Metropolitan officials may not:

- Solicit or receive political contributions at a Metropolitan facility or on Metropolitan property.
- Use Metropolitan’s seal, letterhead, or other indicator of Metropolitan’s identity in a solicitation for political contributions.
- Use Metropolitan assets, property, equipment, staff, or other resources for political activities.

Related State Laws

California Government Code § 84308 (Levine Act):

- Restricts participating in district matters involving certain political donors.
- Is aimed to prevent “pay to play” practices in government.
- *Key – be mindful of political donors who may come before you in your Metropolitan capacity. Disclosures, recusals, and contribution blackout periods may be required.

California Code § 8314a:

- Generally prohibits using public resources for political or personal purposes.

Key Takeaways

Limited restrictions on the political activities of Metropolitan officials help maintain the public trust and ensure that Metropolitan remains non-partisan and non-political in its service to the public.

- Separate political activities from official government position and duties.
- Metropolitan resources, identity, property, and staff time may not be used for personal or political purposes.
- Political contributions may not be solicited or made on Metropolitan property or in Metropolitan buildings/facilities.
- Contact the Ethics Office for advice about specific situations.

*Special Notice:

In addition to the rules above, Administrative Code sections 7123(c) and (d) generally prohibit Metropolitan officials from soliciting any political contribution from any other district official (even when done off Metropolitan property and on personal time).

Due to a recent court case involving a similar state provision, the Ethics Office paused enforcement of 7123(c) and (d) for legal review until further notice. If you choose to solicit Metropolitan officials, please do so with care and in compliance with all other limits above.

Questions?

EthicsOffice@mwdh2o.com



Form 700 - Fact Sheet (Directors)

What is Form 700?

- A mandatory public form required by the state on which government officials report personal financial interests.
- A tool to help officials screen for and avoid potential conflicts of interest in agency matters.
- Intended to provide transparency to the public.

Form 700 Basics

How/When to File Form 700

- Electronically with the California Fair Political Practices Commission (FPPC).
- Annually (**due April 1**) and when assuming and leaving your Metropolitan position.

Level of Disclosure

- Broadest, highest level of disclosure in the state.

Consequences for Not Filing

- FPPC may investigate and impose monetary fines for failing to file, filing late, or filing incomplete/inaccurate forms.
- Board may take action for violations.

Basic Disclosure Requirements

Directors generally must report:

- Gifts (e.g., meals, event tickets, prizes, certain rebates/discounts, loan forgiveness).
- Investments (e.g., stocks, trusts, businesses).
- Income, Loans, and Business Positions (e.g., salary, rental income, personal loans, job titles).
- Real Property (e.g., ownership, deed of trust, leasehold interests).
- Travel Payments (e.g., third party payments for lodging, airlines, and travel reimbursements).

- Arrangements for prospective employment (*new for 2026)

10 Common Oversights

1. Not disclosing spouse's interests
2. Not reporting meals/gifts from third parties
3. Using company acronyms/misspelling company names
4. Not disclosing business clients
5. Not disclosing all business positions held
6. Not reporting acquired/disposed of dates for investments
7. Not reporting stocks held in account managed by investment firm
8. Reporting partial trading of an investment (only need to report the investment once on Form 700)
9. Reporting government bonds (exempt from disclosure)
10. Reporting diversified mutual funds (exempt from disclosure)

Additional Information

- Limited exceptions to disclosure may apply depending on your specific situation.
- Seek advice from the Ethics Office about reporting requirements and possible exceptions.
- Director Form 700s are posted on Metropolitan's website.
- Amendments may be filed if you forget to report an interest.

Questions?

EthicsOffice@mwdh2o.com

Attachment Form 700-P

Arrangement for Prospective Employment
By 87200 Filers

CALIFORNIA
FORM 700-P

Introduction

Form 700-P is for use by Gov. Code Section 87200 Filers of the Political Reform Act (the "Act") as an attachment to the Form 700 (Statement of Economic Interests) to disclose any arrangement for prospective employment.

Gov. Code Section 87200 is applicable to:

- Elected state officers
- Judges and commissioners of courts of the judicial branch of government
- Members of the Public Utilities Commission
- Members of the State Energy Resources Conservation and Development Commission
- Members of the Fair Political Practices Commission
- Members of the California Coastal Commission
- Members of the High-Speed Rail Authority
- Members of planning commissions
- Members of the board of supervisors
- District attorneys
- County counsels
- County treasurers
- Chief administrative officers of counties
- Mayors
- City managers
- City attorneys
- City treasurers
- Chief administrative officers and members of city councils of cities
- Public officials who manage public investments
- Candidates for any of these offices at any election

This attachment is NOT for use by filers not specified in Gov. Code Section 87200 (e.g., conflict of interest code filers "Code Filers" under Gov. Code Section 87300).

"Arrangement for prospective employment" is defined as an agreement pursuant to which a prospective employer's offer of employment has been accepted by the prospective employee, including through verbal or written acceptance. (See Gov. Code Section 82004.2.)

87200 Filers must file the Form 700 (Statement of Economic Interests) periodically and are subject to full disclosure of their personal investments, income, and real property. Effective January 1, 2026, any arrangement for prospective employment must also be disclosed. Attachment 700-P disclosing any arrangement for prospective employment must be filed at the same time as the Form 700 for assuming, annual, and leaving office periods under the Act. (See Gov. Code Sections 87202, 87203, and 87204).

Instructions

Report the date the filer accepted the prospective employer's offer of employment, the business position, a general description of the business activity of the prospective employer, and the name and street address of the prospective employer.

Assuming Office Statement

A person who is elected, appointed, or nominated to an office specified in Section 87200 must disclose any arrangement for prospective employment if employment with that employer had not begun as of the date of assuming office.

Annual and Leaving Office Statement(s)

A person who holds an office specified in Section 87200 must disclose any arrangement for prospective employment during the period since the previous statement filed.

Attachment Form 700-P
Arrangement for Prospective Employment
By 87200 Filers
 (Attachment to Form 700)

| |
|---|
| CALIFORNIA FORM 700-P FAIR POLITICAL PRACTICES COMMISSION |
| Name <hr/> |

| | |
|---|---|
| <p>▶ ARRANGEMENT FOR PROSPECTIVE EMPLOYMENT</p> <p>NAME OF PROSPECTIVE EMPLOYER</p> <hr/> <p>ADDRESS <i>(Business Address Acceptable)</i></p> <hr/> <p>GENERAL DESCRIPTION OF BUSINESS ACTIVITY</p> <hr/> <p>YOUR BUSINESS POSITION</p> <hr/> <p>DATE OF ACCEPTANCE OF EMPLOYMENT OFFER</p> <p>___/___/___</p> | <p>▶ ARRANGEMENT FOR PROSPECTIVE EMPLOYMENT</p> <p>NAME OF PROSPECTIVE EMPLOYER</p> <hr/> <p>ADDRESS <i>(Business Address Acceptable)</i></p> <hr/> <p>GENERAL DESCRIPTION OF BUSINESS ACTIVITY</p> <hr/> <p>YOUR BUSINESS POSITION</p> <hr/> <p>DATE OF ACCEPTANCE OF EMPLOYMENT OFFER</p> <p>___/___/___</p> |
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Comments:



Retaliation Policy Fact Sheet

Summary of Retaliation Policy

1) Metropolitan officials may not take an "adverse employment action" against someone for reporting in good faith information the person reasonably believes indicates:

- A work-related violation of any law or district policy¹
- Gross waste or abuse of MWD resources
- A workplace safety concern or
- A public health or safety danger

2) Officials may not discourage persons from reporting the concerns above or take adverse action against someone for participating in investigations of the reported concerns. (See Admin Code § 7128)

Adverse Employment Actions

Examples of adverse employment actions include, but are not limited to:

- Spreading rumors
- Demotions
- Shunning
- Harassing
- Disciplinary Action
- Negative Evaluations
- Frivolous Complaints
- Excluding from Activities
- Changing Work Assignments
- Treating People Differently

*The policy prohibits retaliation by Metropolitan directors, managers, and employees.

Hypothetical

A manager runs a consulting firm on personal time. It becomes apparent to an employee that the manager has a conflict of interest between this consulting firm and a Metropolitan project in which the manager is involved. The manager tells the employee it would be unwise to mention this to anyone, especially if the employee wants to be considered for a promotion.

Is this potential retaliation? Yes. The manager appears to be discouraging reporting a potential violation, which is covered by the policy.

Tips to Avoid Retaliation

To help avoid perceived and actual retaliation, and to promote a speak-up workplace culture:

- Follow Metropolitan policies, laws, and safety requirements.
- Promote and model a "speak up" culture.
- Show appreciation for those sharing concerns and follow up on any actions taken.
- Maintain civility and professionalism.
- Avoid asking who reported a concern.
- Remain professional during an investigation.
- Do not treat someone differently because they reported a concern.

Questions?

EthicsOffice@mwdh2o.com

(213) 217 – 5832

¹ Adverse employment actions for reporting potential EEO violations are handled by the EEO Office.