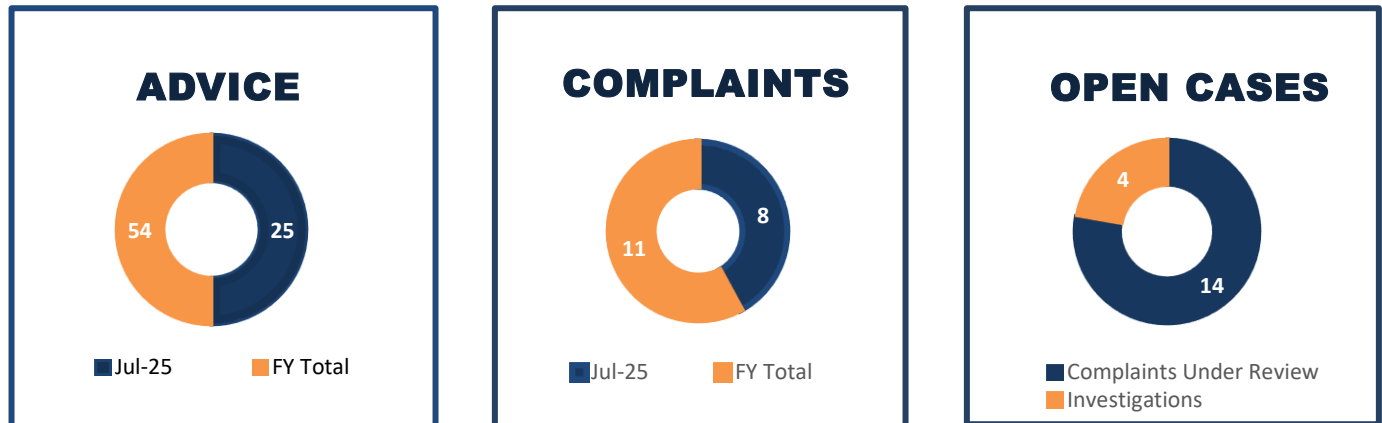




OFFICE OF ETHICS

Ethics Officer's Report for September 2025



EDUCATION Program

Staff presented an Ethics Office overview at new employee orientations hosted by Human Resources. Staff also presented the mandatory Government Ethics 101 course to employees at Jensen Water Treatment Plant and training on the misuse of governmental position or authority rule at the Community and Workplace Culture Committee meeting.

Staff attended ethics-related sessions: *Make it Make Sense: Effective Report Writing (Investigation and Enforcement Track)* and *Training Tracking! A Data Collection Conversation* presented by the Council on Governmental Ethics Laws; *Conflict of Interest Code - Presentation for Local Agencies* presented by the Fair Political Practices Commission; and *Compilations, Reviews, and Preparations: Engagement Performance and Annual Update* presented by Surgent Professional Education.

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 27 compliance-related matters for Metropolitan Directors and staff related to Form 700.

Annual Form 700 Compliance – All Directors have filed their Annual Form 700. Four

employees have not yet filed their Annual Form 700. Staff will continue efforts to reach 100% compliance.

AB 1234 Ethics Training Compliance —Two officials are not in compliance. Staff will continue efforts to seek 100% compliance.

ADVICE Program

Staff addressed 25 time-sensitive advice matters for directors and employees related to the following ethics areas: conflicts of interest, financial disclosure, recusals, gifts, outside employment, and other ethics-related topics.

Examples of advice requested:

- Whether it would be permissible for a candidate for employment to continue outside consulting work once they accept a Metropolitan position.
- What are the ethics considerations where a Metropolitan official serves on a nonprofit organization's board of directors where the organization has business with, or seeks funding from, Metropolitan.
- What are the recusal requirements for a Metropolitan official where a Metropolitan contract process involves the official's outside consulting work.
- What ethics rules are implicated where a Metropolitan official is invited by contractors and prospective contractors to invite-only dinners at conferences.

Staff also helped identify and advise on potential conflicts of interest in Committee and Board items and drafted recusal and disclosure scripts in accordance with state law.

INVESTIGATION Program

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

- Alleged retaliation for reporting safety concerns. [Under review]
- Two cases of alleged conflicts of interest involving contracts. [Under review]
- Alleged waste or misuse of District funds. [Under review]
- Alleged improper outside employment activity. [Under review]
- Three cases of alleged unauthorized release of confidential information. [Under investigation]

Open Complaints and Investigations – As of August 31, 2025, the Investigation Program was managing a total of 14 open complaints under review and four ethics investigations.

Resolved Complaints – Four allegations of potential ethics violations resulted in investigations being opened following preliminary reviews. It took an average of 6 days to

review these matters.

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.