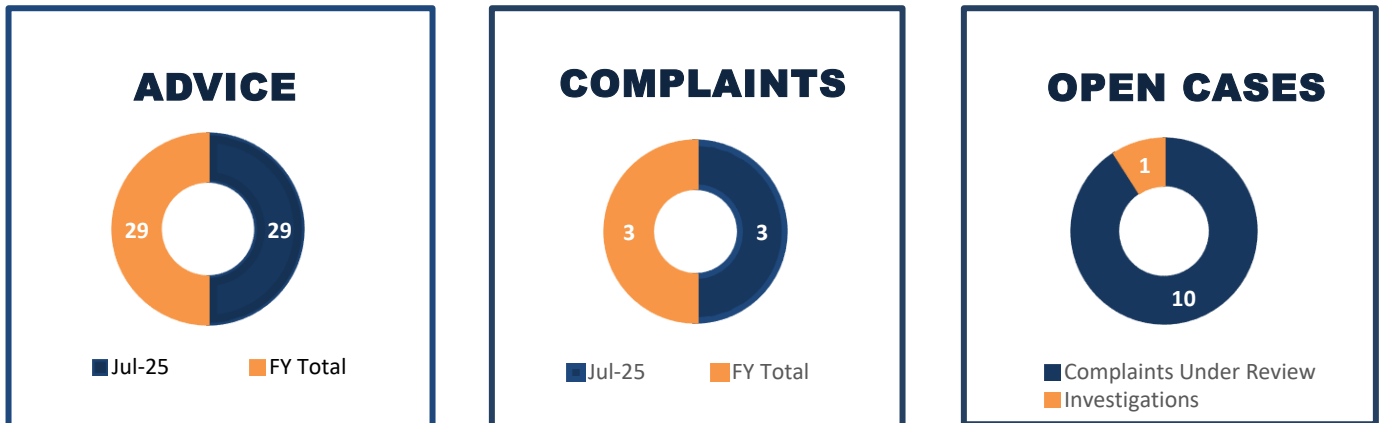




OFFICE OF ETHICS

Ethics Officer's Report for July 2025



EDUCATION Program

Staff presented an Ethics Office overview at new employee orientations hosted by Human Resources and an overview of Metropolitan's retaliation policy to the Community and Workplace Culture Committee. Staff also issued the Ethics Office's quarterly newsletter.

Staff attended ethics-related sessions presented by the Council on Governmental Ethics Laws, including: *Making The Case (Investigation & Enforcement Track)* and *Ethics in Focus*.

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

Annual Form 700 Compliance – All Directors have filed their Annual Form 700. Six employees have not yet filed their Annual Form 700. Staff will continue efforts to reach 100% compliance.

AB 1234 Ethics Training Compliance – 94% of Metropolitan officials required to take biennial AB 1234 state ethics training are in compliance. Four officials are not in compliance. Staff will continue efforts to seek 100% compliance.

ADVICE Program

Advice staff addressed 29 time-sensitive advice requests for directors and employees related to the following ethics areas: conflicts of interest, financial disclosure, recusals, gifts, prohibited director communications, and other ethics-related topics.

Examples of advice requested:

- Whether an official may accept conference registration paid for by a third party.
- Whether an official may accept a range of gifts from vendors at a conference.
- Whether an official may use Metropolitan's vendor discount on Metropolitan accounts for personal purchases.
- Whether an official must report their spouse's position and salary on Form 700 and spouse's investments.
- Whether an official is required to recuse from all Metropolitan matters involving a prospective employer.

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 three new complaints involving the following allegations:

- Member of the public dispute over turf removal rebate program. [Referred to management]
- Unauthorized release of confidential information. [Under review]
- Employee use of vendor discount for personal purchases. [Under review]

Open Complaints and Investigations – As of July 31, 2025, the Investigation Program was managing a total of 10 open complaints and one open ethics investigation.

Resolved Complaints – Three allegations of potential ethics violations were resolved following preliminary reviews. It took an average of 14 days to review and resolve 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.