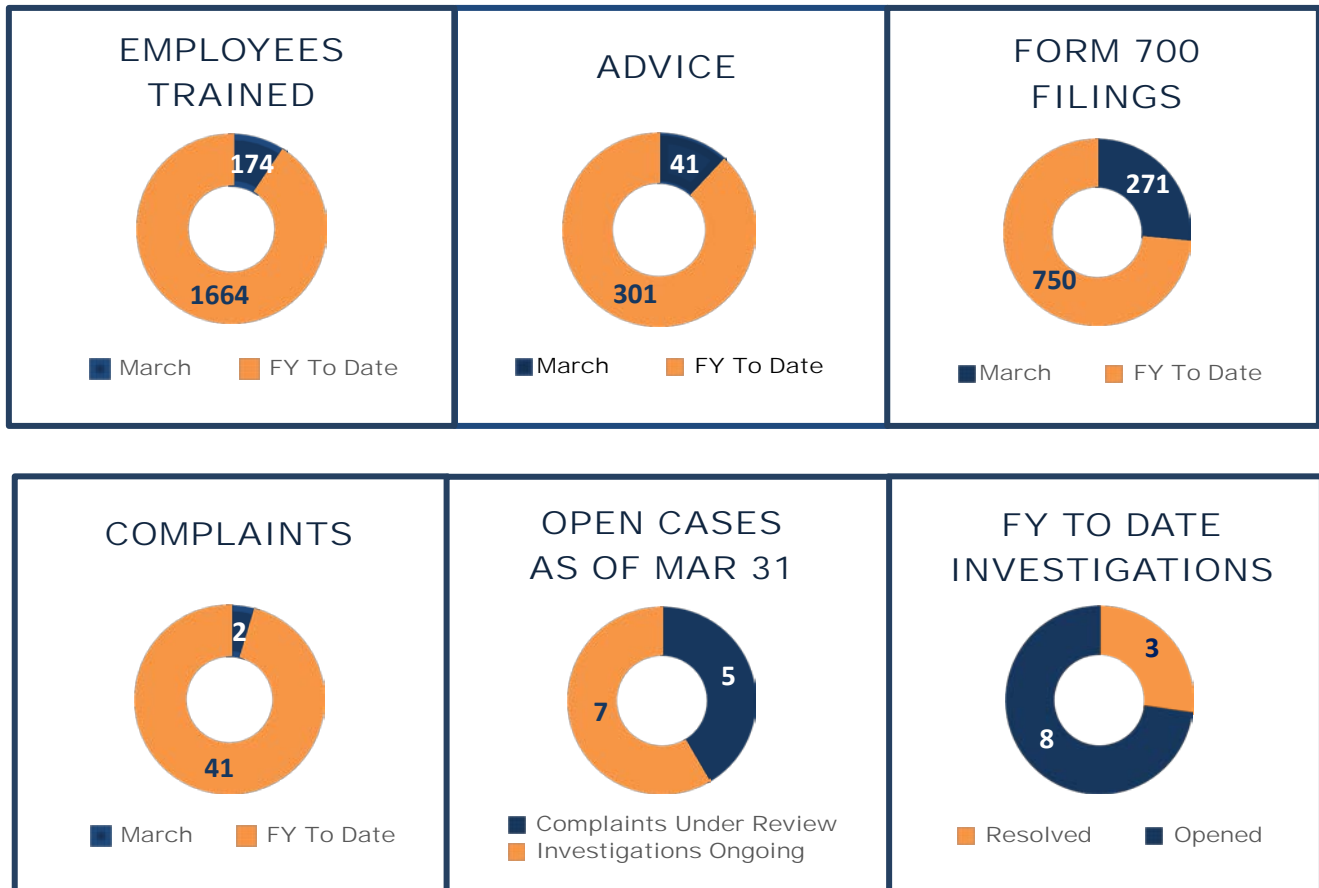




OFFICE OF ETHICS

Report for March 2026



EDUCATION Program

Staff presented Ethics Office overviews at three new employee orientation sessions hosted by Human Resources and two in-person *Government Ethics 101* trainings to employees at Union Station.

Ethics staff participated in continuing ethics education:

- *Public Corruption Post-McDonnell: Considerations for the Present and Future*, presented by the Council on Governmental Ethics Laws.

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. Staff addressed 66 compliance-related matters for directors and employees related to Form 700.

Annual Form 700 Compliance – The 2025 Annual Form 700 filing season began January 1, 2026. 750 Annual Form 700s have been filed since January 1, 2026. All directors timely filed their Annual Form 700. 79 employees have not filed. Staff will continue efforts to seek compliance from these employees to help Metropolitan meet the state's Annual Form 700 filing requirement.

AB 1234 Ethics Training Compliance – Staff assisted directors and employees with their AB 1234 ethics training requirements. Assistance included notifications, troubleshooting the online training program, and obtaining training certification. A total of 44 employees completed their training this month. One director has not submitted their ethics training certificate to the Ethics Office. Staff will continue efforts to confirm 100% compliance. Staff addressed 66 AB 1234 compliance-related matters for directors and employees.

ADVICE Program

Staff addressed 41 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, outside employment, gifts, political activities, and other ethics-related topics.

Advice questions included:

- Is a new employee required to report income from their prior employer, an Engineering firm, on Form 700, and does the employee have a conflict of interest in Metropolitan matters involving the recent former employer?
- Are Metropolitan officials permitted to accept free transportation from prospective vendors?
- What are the ethics considerations where a contractor asks a Metropolitan manager to play golf in their free time?
- What are the considerations where a prospective vendor offers to conduct a product demonstration at Metropolitan and brings lunch for staff?

Staff reviewed Committee and Board letters and director financial interests listed in Forms 700 to proactively help screen for potential conflicts of interest in Metropolitan matters. Staff also prepared disclosure scripts for directors who are required to disclose financial interests and recuse from agenda items at the upcoming Committee and Board meetings. Staff also reviewed conflict of interest disclosure forms from contractors and subcontractors to help screen for and address potential conflicts prior to finalizing Metropolitan contracts.

INVESTIGATION Program

Complaints Received – The Ethics Office received two new complaints in March. Both complaints involved ethics allegations and are currently under preliminary review by the Ethics Office. One alleged a misuse of authority to favor a job candidate in a recruitment process, and the other alleged retaliation for reporting a safety concern.

Complaints Resolved – Seven preliminary reviews were completed which assessed complaints that alleged ethics violations. Two complaints were closed with no further action because the evidence reviewed did not support the allegations, and one complaint was referred to the General Counsel’s Office. Investigations were opened in the other four complaints. Those investigations are discussed further below. It took an average of 152 calendar days to complete the preliminary reviews, some of which involved multiple respondents and complex allegations.

Open Complaints and Investigations – As of March 31, 2026, the Investigation Program was managing a total of five open ethics complaints under preliminary review and seven ongoing ethics investigations. The first ongoing investigation, alleging a conflict of interest, was opened in September and is expected to be completed within the next 90 days. The remaining six investigations are expected to be completed within the standard six-month timeframe. Details of the six investigations are as follows: two alleging conflicts of interest were opened in November; three alleging misuse of authority for personal gain related to improper expenditures of District funds were opened in March; and one alleging the improper release of confidential information related to a personnel process was opened in March.

Alternative Complaint Hotline – No complaints were filed via the Alternative Complaint Hotline in March.

ADMINISTRATION

Professional Services Contracts – The Ethics Office exercised its option to extend the term of its agreement with Best, Best and Krieger by an additional year. The extension became effective March 1, 2026.

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.