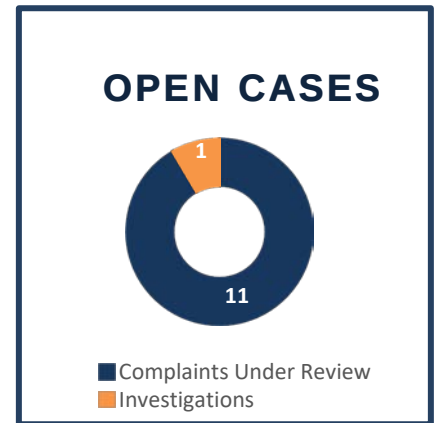
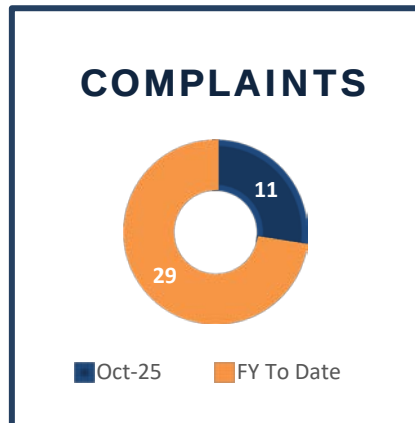
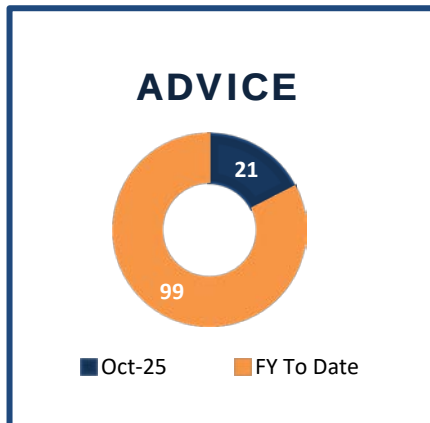




OFFICE OF ETHICS

Ethics Officer's Report for October 2025



EDUCATION Program

Staff presented an Ethics Office overview at three new employee orientations hosted by Human Resources, an overview of the Ethics Office's lobbying rules to the Community and Workplace Culture Committee, and the *Government Ethics 101* training to employees at Skinner and Mills.

Staff attended *Strategies for Increasing Compliance and Engagement in Training* presented by the Council on Government 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. In total, staff addressed 19 compliance-related matters for directors and staff related to Form 700.

Annual Form 700 Compliance – All directors have filed their Annual Form 700. One employee has not yet filed their Annual Form 700. Staff will continue efforts to reach 100% compliance.

AB 1234 Ethics Training Compliance —Two directors have not submitted their ethics training certificate to the Ethics Office. Staff will continue efforts to confirm 100% compliance.

ADVICE Program

Staff addressed 21 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, gifts, outside employment, inspection trips, and other ethics-related topics.

Examples of advice requested:

- Whether employee may accept a ticket to an awards dinner from a Metropolitan contractor;
- Whether there are ethics considerations for an employee considering serving on another government agency's board of directors;
- Whether a meal from another government agency must be reported on Form 700;
- Whether a contractor's prior work on a project disqualifies the contractor from future work on the same project.

Staff also helped screen for potential conflicts of interest in Committee and Board items and assisted FPPC legal staff with FPPC advice requests related to Metropolitan.

INVESTIGATION Program

Complaints Received – The Ethics Office received 11 new complaints involving the following allegations:

- Improper release of confidential information. [Under review]
- Conflict of interest regarding contracts. [Closed after initial review]
- Conflict of interest regarding contracts. [Under review]
- Prohibited Director Communication. [Closed after initial review]
- Misuse of authority for personal gain. [Under review]
- Misuse of authority regarding a personnel action. [Under review]
- Employee disagreement with an operating policy. [Closed after initial review]
- Discrimination during a recruitment process. [Referred to EEO Office]
- Resident disagreement with operational process. [Referred to GM]
- Alleged unsafe working conditions at MWD facility. [Referred to GM]
- Information about potential vendor contract credit. [Referred to Management]

Complaints Resolved – Five allegations of potential ethics violations were closed following initial reviews. These cases included allegations of prohibited outside employment; misuse of authority; retaliation; prohibited Director communications; and conflict of interest. It took an average of 27 days to resolve these matters. Five allegations of complaints outside of the Ethics Office jurisdiction were referred to other offices including the EEO Office and the General Manager.

Open Complaints and Investigations – As of October 31, 2025, the Investigation Program was managing a total of 11 open complaints under review and one ongoing ethics investigation. The ongoing investigation, alleging a conflict of interest, was opened in September and is expected to be completed within our standard six-month timeframe.

Ethics Officer Findings – The Ethics Officer made findings in six cases following formal investigations:

- In two related cases, it was determined that managers misused their authority during a recruitment process in violation of an ethics rule.
- In three related cases, it was determined that employees did not release confidential information in violation of an ethics rule.
- In one case, it was determined that there was no misuse of authority during a recruitment process.

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

Professional Services Contracts – The Ethics Office entered into three contracts for professional services on an as-needed basis: 1) Shaw Law Group for an annual maximum of \$100,000 for independent counsel; 2) Shaw Law Group for an annual maximum of \$240,000 for investigations; and 3) Ellis Investigations Law Corporation for an annual maximum of \$240,000 for investigations.

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.