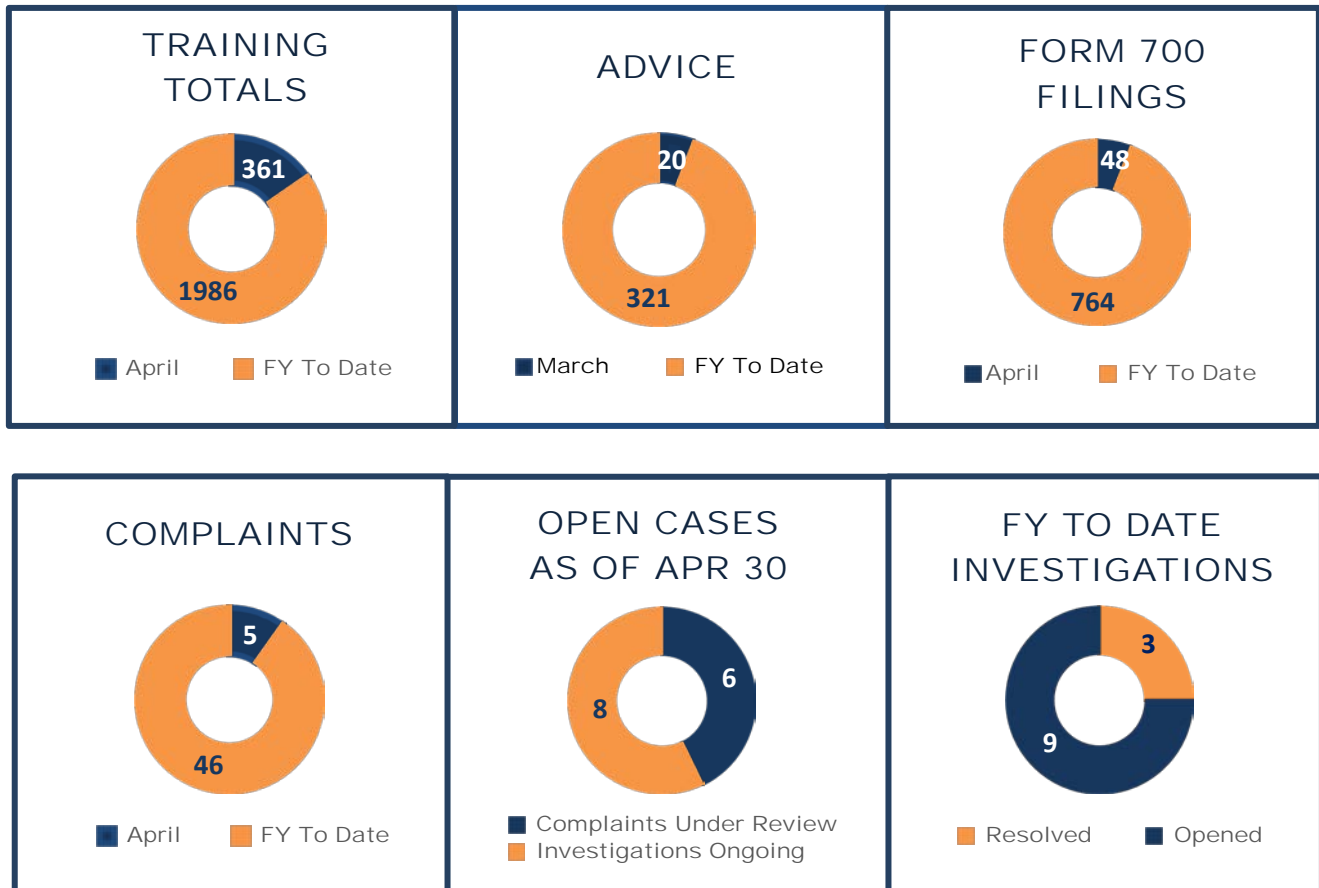




## OFFICE OF ETHICS

Report for April 2026



## EDUCATION Program

Staff presented Ethics Office overviews at four new employee orientation sessions hosted by Human Resources and three in-person *Government Ethics 101* training sessions for 151 employees at Union Station.

Ethics staff participated in continuing ethics education:

- *Whistleblowers: The Challenges of Investigating Anonymous Complaints*, presented by the Association of Workplace Investigators.

## 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 39 compliance-related matters for directors and employees related to Form 700.

**Annual Form 700 Compliance** – 764 Annual Form 700s have been filed since January 1, 2026. All directors timely filed their Annual Form 700. 61 employees have not yet filed. Staff continues efforts to obtain compliance from these employees to help Metropolitan meet the state’s Annual Form 700 filing requirement.

**AB 1234 Ethics Training Compliance** – Staff assisted employees with AB 1234 ethics training requirements. Assistance included notifications, troubleshooting the online training program, and obtaining training certification. A total of 120 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 258 AB 1234 compliance-related matters for employees.

**Proposed Amendment of Conflict of Interest Code (COI Code)** – Pursuant to state law, the Ethics Office proposed to amend Metropolitan’s COI Code, a document that identifies which employees are required to file Form 700 and their disclosure requirements. Proposed amendments include adding newly created positions that must file Form 700, updating titles of existing positions, revising disclosure requirements, and making other technical changes. The state mandated 45-day notice and comment period began on April 28, 2026 and ends June 12, 2026.

## ADVICE Program

Staff addressed 20 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, outside employment, gifts, and other ethics-related topics.

Advice questions included:

- May a Metropolitan official participate in Metropolitan matters involving their consulting clients?
- Does a Metropolitan official need to disclose a prize awarded during an external training session on Form 700?
- May an employee participate in a Metropolitan matter involving their former engineering firm employer?
- May an employee accept travel payments from a nonprofit to attend a conference? If so, are the payments reportable on Form 700 and does acceptance create a conflict of interest in future Metropolitan matters involving the nonprofit?

Staff reviewed Committee and Board letters and directors’ financial interests listed in Forms 700 to help screen for potential conflicts of interest in Metropolitan matters. 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 five new complaints in April. Three complaints involved ethics allegations, and two involved non-ethics allegations. The three ethics complaints alleged two separate incidents of unfair treatment by managers in personnel investigations and release of confidential medical information in an accommodations process. One complaint was resolved after a preliminary review found insufficient basis to investigate. The other two are currently under preliminary review by the Ethics Office. The two non-ethics complaints alleged discrimination and harassment and were referred to the EEO Office.

**Complaints Resolved** – Three preliminary reviews were completed to assess complaints alleging ethics violations. Two complaints were closed with no further action because the evidence reviewed did not support the allegations. An investigation was initiated into the third complaint, which is discussed further below. It took an average of 28 calendar days to complete the preliminary reviews.

**Open Complaints and Investigations** – As of April 30, 2026, the Investigation Program was managing a total of six open ethics complaints under preliminary review and eight 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 60 days. The remaining seven investigations are expected to be completed within the standard six-month timeframe. Details of the seven investigations are as follows: two alleging conflicts of interest were opened in November; four alleging misuse of authority for personal gain related to improper expenditures of District funds – three opened in March, and one in April; 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 April.

### 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.