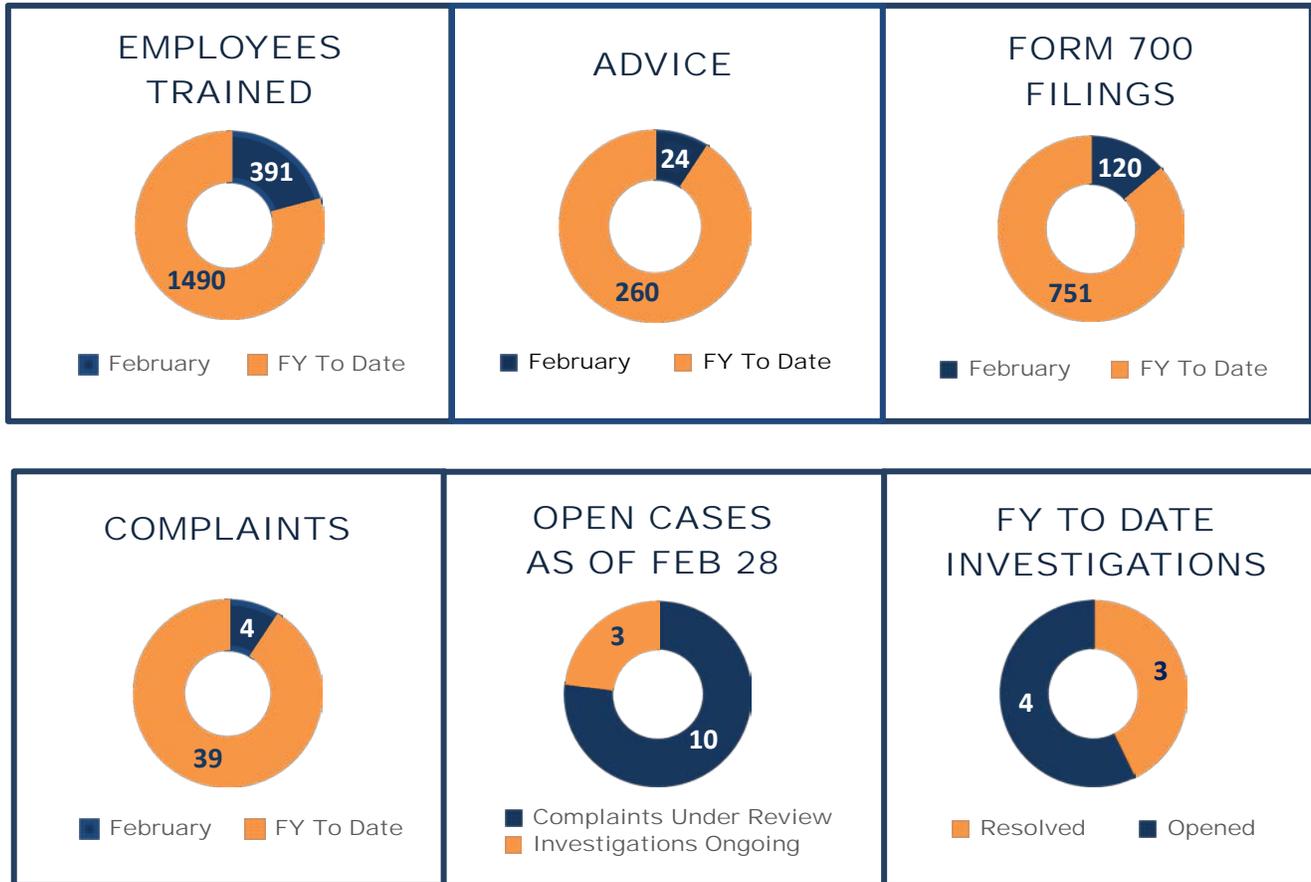




## OFFICE OF ETHICS

### Ethics Officer's Report for February 2026



## EDUCATION Program

Staff presented an Ethics Office overview at the new employee orientation hosted by Human Resources, two in-person *Government Ethics 101* trainings to employees at Union Station, and a Form 700 training for the External Affairs Group.

Ethics staff participated in continuing ethics education:

- *Form 700 State and Local Filing Officer Webinar*, presented by the California Fair Political Practices Commission (FPPC)
- *Form 700 Filers Webinar*, presented by the FPPC

- *Design It. Power It. Strengthen It. A Three-Part Strategy for Engaging Trainings*, 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 71 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. A total of 475 Annual Form 700s have been filed since January 1, 2026. Staff will continue to help Metropolitan reach 100% compliance by the April 1, 2026 deadline.

**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 51 staff members 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 77 AB 1234 compliance-related matters for directors and employees.

## ADVICE Program

Staff addressed 24 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, outside employment, political activities, and other ethics-related topics.

Advice matters included:

- Are Metropolitan officials permitted to make political endorsements and, if so, may the endorsement include their Metropolitan position for identification purposes?
- What are the ethics rules surrounding employees purchasing discounted tickets where a networking event is hosted by a nonprofit organization, is held at a local nightclub, and is sponsored by Metropolitan contractors? Further, may Metropolitan reimburse employees for such expenditures?
- Is an employee required to disclose spousal income and their child's stock?

Staff also helped screen for potential conflicts of interest in Committee and Board items and prepared disclosure scripts for directors required to disclose financial interests and recuse from agenda items.

## INVESTIGATION Program

**Complaints Received** – The Ethics Office received four new complaints in February. One

complaint alleged employee misconduct and was referred to Human Resources for review. The other three complaints involved ethics allegations and are currently under preliminary review by the Ethics Office. One alleged the unauthorized release of confidential medical information in a personnel process; the second alleged a conflict of interest with a Metropolitan vendor; and the third alleged unfair treatment in a personnel investigation.

**Complaints Resolved** – After preliminary reviews were conducted, two complaints alleging ethics violations were closed with no further action because the evidence reviewed did not support the allegations, and one complaint alleging employee misconduct was referred to Human Resources for review. The two ethics complaints alleged separate incidents of misuse of authority in personnel-related matters. It took an average of 25 calendar days to complete the preliminary reviews.

**Open Complaints and Investigations** – As of February 28, 2026, the Investigation Program was managing a total of 10 open ethics complaints under preliminary review and three ongoing ethics investigations. The first ongoing investigation, alleging a conflict of interest, was opened in September and is expected to be completed within the standard six-month timeframe. The other two investigations also allege conflicts of interest. Both were opened in November and are also expected to be completed within the standard six-month timeframe.

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

## ADMINISTRATION

**Professional Services Contracts** – The Ethics Office entered into one new contract with Strumwasser & Woocher LLP for independent legal services.

### 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.