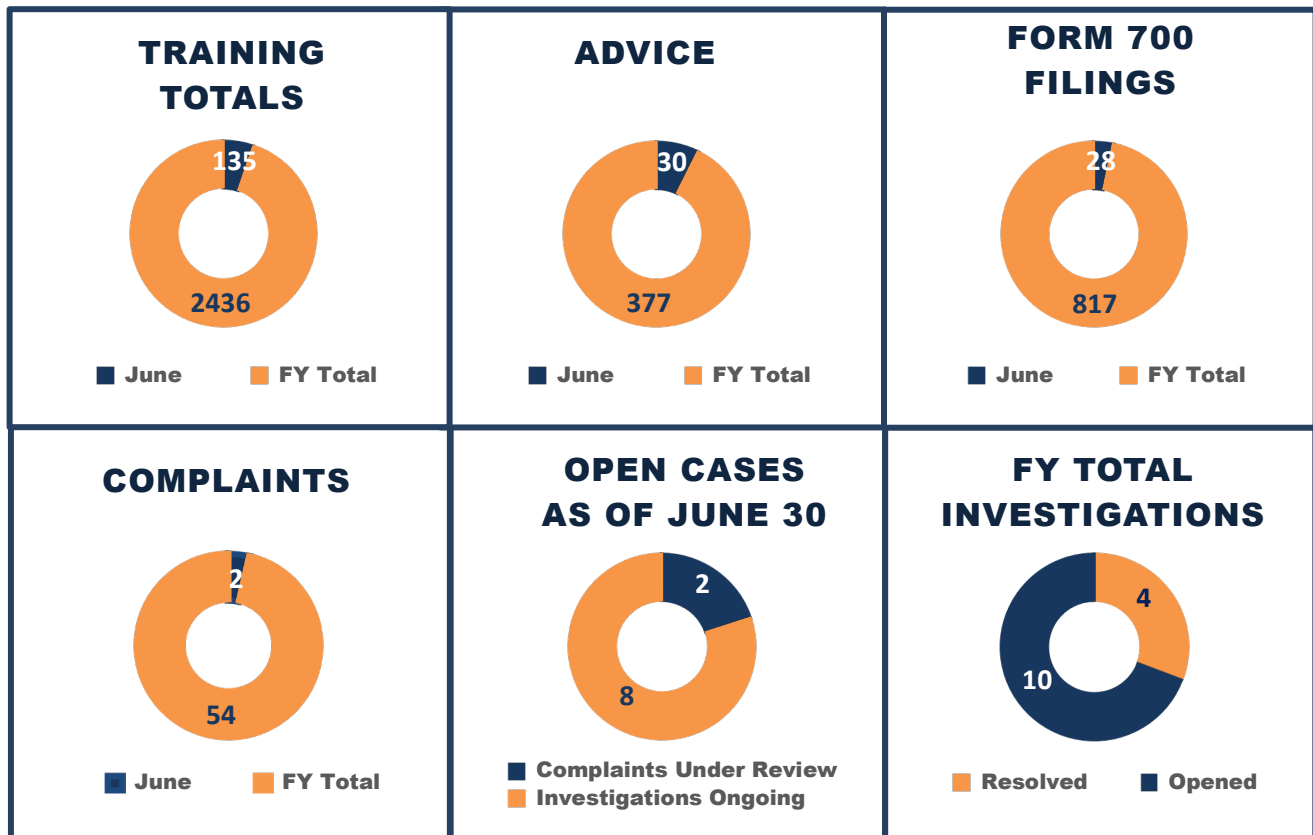




OFFICE OF ETHICS

Report for June 2026



EDUCATION Program

Staff presented Ethics Office overviews at two new employee orientation sessions hosted by Human Resources and two in-person *Government Ethics 101* training sessions for 84 employees at Union Station.

Staff participated in two Safety Fairs organized by Metropolitan to engage with operations staff at the Weymouth Water Treatment Plant and the Lake Mathews Reservoir.

Ethics staff participated in continuing ethics education:

- “Retaliation Against Compliance Officers: What the Numbers Really Say” presented by CaseIQ. The session discussed this nationwide survey:
<https://www.caseiq.com/resources/articles/retaliation-against-compliance-officers-what-new-data-reveals-about-corporate-compliance>;

- “Form 700 State and Local Filing Officer” training presented by the California Fair Political Practices Commission; and
- “Interviewing and Investigating the Public Employee” 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. Staff addressed 86 compliance-related matters for directors and employees related to Form 700.

Annual Form 700 Compliance – 817 Annual Form 700s have been filed since January 1, 2026. All directors timely filed their Annual Form 700. Twenty-five employees have not yet filed. This is down from 43 employees reported in May. 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 16 employees completed their training this month. Three directors have not submitted their ethics training certificate to the Ethics Office. Staff will continue efforts to confirm 100% compliance. Staff addressed 32 AB 1234 compliance-related matters for employees.

ADVICE Program

Staff addressed 30 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, political activities, gifts, post-employment lobbying, and other ethics-related topics.

Advice questions included:

- May a Metropolitan workgroup enter into a services contract with a recently separated Metropolitan employee without a competitive process?
- May a Metropolitan former official represent a private entity before member agencies under the revolving door restriction?
- May a Metropolitan official host a political fundraiser?
- May an official participate in a Metropolitan matter involving the parent company of an entity in which the official owns stock?

Staff reviewed Committee and Board letters and directors’ financial interests listed in Form 700s to help screen for potential conflicts of interest in Metropolitan matters and prepared recusal and disclosure scripts where applicable. 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 June. One complaint alleged retaliation for reporting potential workplace policy violations and is currently under preliminary review by the Ethics Office. The second complaint alleged bullying and mistreatment and was referred to Human Resources and Management.

Complaints Resolved – The Ethics Office resolved three complaints in June. One complaint alleging unfair treatment of an employee for a promotional opportunity was referred to the EEO Office because the mistreatment was allegedly based on a protected class. A complaint alleging general bullying and mistreatment was referred to Human Resources and Management. A complaint alleging that an employee misused their authority by manipulating payroll records for personal gain was closed following completion of a preliminary review because the evidence reviewed did not support the allegations. It took approximately 200 days to complete the preliminary review.

Open Complaints and Investigations – As of June 30, 2026, the Investigation Program was managing a total of two open ethics complaints under preliminary review and eight ongoing ethics investigations. The first ongoing investigation, which alleged a conflict of interest, was opened in September and is expected to be completed within the next 30-60 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; and five alleging a misuse of authority for personal gain – two opened in March, one in April, and one in May related to improper expenditures of District funds, and one opened in March related to improper use of District resources.

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

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.