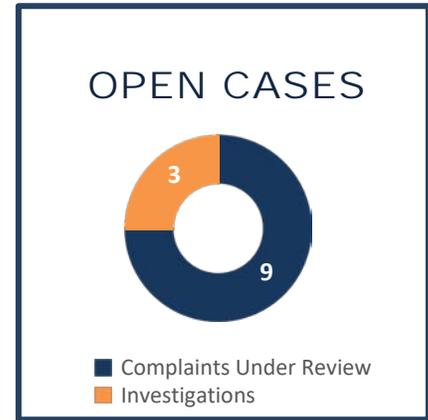
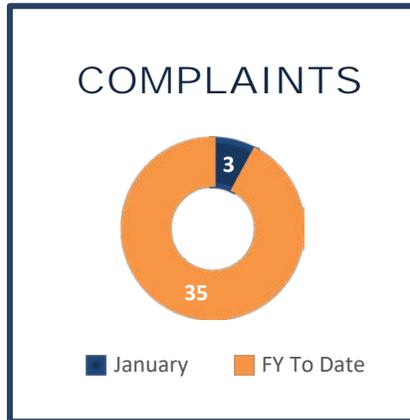
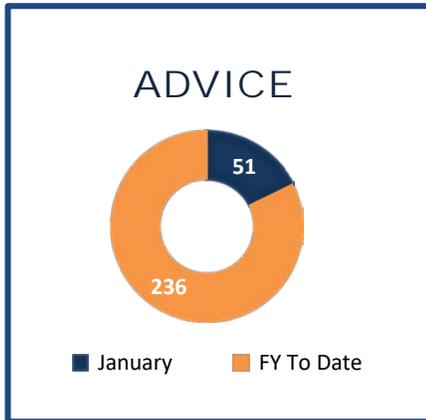




OFFICE OF ETHICS

Ethics Officer's Report for January 2026



EDUCATION Program

Staff presented an Ethics Office overview at two new employee orientations hosted by Human Resources and one in-person *Government Ethics 101* training to employees at Union Station.

Investigations staff attended *Applying AI in Workplace Investigations* 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. In total, staff addressed 84 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. 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. One director has not submitted their ethics training certificate to the Ethics Office. Staff will continue efforts to confirm 100% compliance. In total, staff addressed 204 AB 1234 compliance-related matters for directors and employees.

ADVICE Program

Staff addressed 51 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, gifts, and other ethics-related topics.

Advice matters included:

- What ethics rules, including applicable conflicts of interest rules, are potentially implicated when an employee's work unit enters into a contract with the employee's spouse, and how do the employee and managers navigate them?
- Are a prime consultant and subconsultant disqualified from a project where they worked under prior contracts on the same project?
- Is an official required to disclose income from rental tenants in connection with a property in another state on Form 700?
- How should an official report clients of their consulting business on Form 700?
- May a Metropolitan employee accept free admission to a conference from an outside association?

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 three new complaints in January alleging separate instances of misuse of authority in personnel-related matters. One complaint was closed following a preliminary review, and the other two are currently under preliminary review by the Ethics Office.

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. The first case alleged a misuse of authority in a personnel-related matter. The second case alleged retaliation for reporting potential safety concerns. It took an average of eight calendar days to complete these preliminary reviews.

Open Complaints and Investigations – As of January 31, 2026, the Investigation Program was managing a total of nine 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 January.

ADMINISTRATION

Professional Services Contracts – The Ethics Office did not enter into any new contracts for professional services in January.

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.