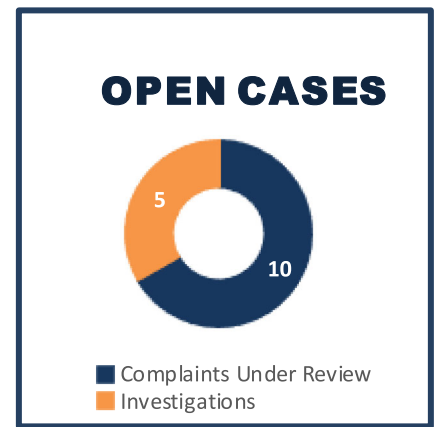
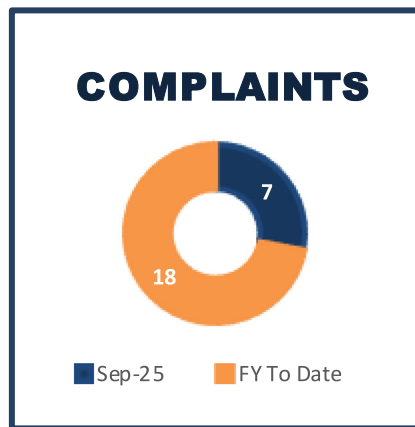
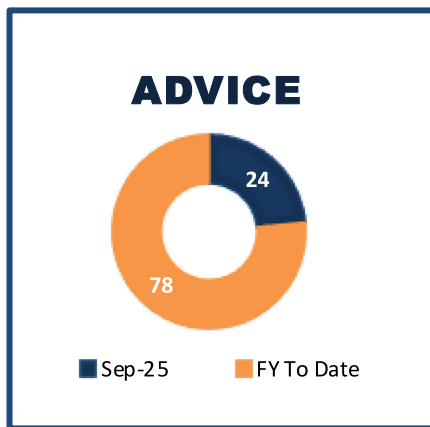




OFFICE OF ETHICS

Ethics Officer's Report for September 2025



EDUCATION Program

Staff presented an Ethics Office overview at three new employee orientations hosted by Human Resources. Staff also presented 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.

Three Ethics staff members attended the Society of Corporate Compliance and Ethics (SCCE) Annual Conference. The SCCE supports ethics and compliance professionals with education, certification, networking opportunities and other resources related to the field. Sessions included:

- ✓ Elements of an Effective Conflicts of Interest Program
- ✓ Learning and Engagement in the Age of Distraction
- ✓ How to Refresh your Code of Conduct, Provide Data to your Board, and Engage with Employees
- ✓ Refreshing the Ethics & Compliance Brand
- ✓ Presenting to Boards and other Senior Stakeholders Using Data and Storytelling
- ✓ Building Resilience in your Investigative Team
- ✓ Translating Law into Compliance

Staff also attended the following sessions: *Privacy and Security Training: Obligations of*

Confidentiality and Safekeeping presented by Surgent Professional Education; *The Efforts to Dismantle Watergate Reforms and Potential Impacts* presented by the Council on Government Ethics Laws; and *After the Investigation: The Road to Skelly* 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 38 compliance-related matters for directors and staff related to Form 700.

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

Conflict of Interest Code Biennial Review – Staff submitted the state-mandated biennial draft Conflict of Interest Code (COI Code) amendment to the Fair Political Practices Commission (FPPC) for preliminary approval. Metropolitan's COI Code identifies positions required to file Form 700 and sets forth the required level of disclosure for each position.

Proposed changes include the addition of new and amended positions and job titles since the last revision and updated disclosure requirements for some positions. Upon receiving FPPC approval, a 45-day notice and comment period will begin where employees will have an opportunity to comment on the proposed changes prior to finalization. Staff anticipates that Metropolitan's revised COI Code will become effective by the end of this year.

AB 1234 Ethics Training Compliance – Two officials are not in compliance. Staff will continue efforts to seek 100% compliance.

ADVICE Program

Staff addressed 24 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, recusals, gifts, outside employment, post-employment lobbying, inspection trips, conferences, and other ethics-related topics.

Examples of advice requested:

- Whether directors' spouses may attend Metropolitan inspection trips at Metropolitan expense under state conflict of interest and other ethics provisions;
- Whether an employee's spouse may attend a Metropolitan inspection trip;
- Whether an official may participate in Metropolitan matters involving a nonprofit organization where the official serves as a non-compensated member of the nonprofit's board of directors;
- Whether officials may accept free vendor dinners, vendor-sponsored lunches, and

handouts at a conference; and

- Whether an official may accept tickets to a nonprofit fundraiser provided directly from the nonprofit organization.

Staff also helped identify and advise on potential conflicts of interest in Committee and Board items, drafted recusal and disclosure scripts for directors in accordance with state law, collaborated with the General Counsel on an outside opinion regarding inspection trips, and assisted FPPC legal staff with FPPC advice requests related to Metropolitan.

INVESTIGATION Program

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

- Misuse of authority regarding a recruitment. [Under review]
- Misuse of authority for personal gain. [Closed after initial review]
- Misuse of authority regarding a personnel action. [Closed after initial review]
- Improper release of confidential information. [Under review]
- Conflict of interest regarding contracts. [Closed after initial review]
- Retaliation for protected whistleblower activity. [Under review]
- Retaliation for protected EEO activity. [Referred to EEO Office]

Open Complaints and Investigations – As of September 30, 2025, the Investigation Program was managing a total of 10 open complaints under review and five ethics investigations.

Resolved Complaints – 10 allegations of potential ethics violations were closed following initial reviews. It took an average of 70 days to review these matters due to several matters involving complex allegations with multiple involved parties. In four instances, the allegations also included issues outside of the Ethics Office jurisdiction which were referred to other offices including the General Auditor, EEO Office, and Employee Relations.

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.