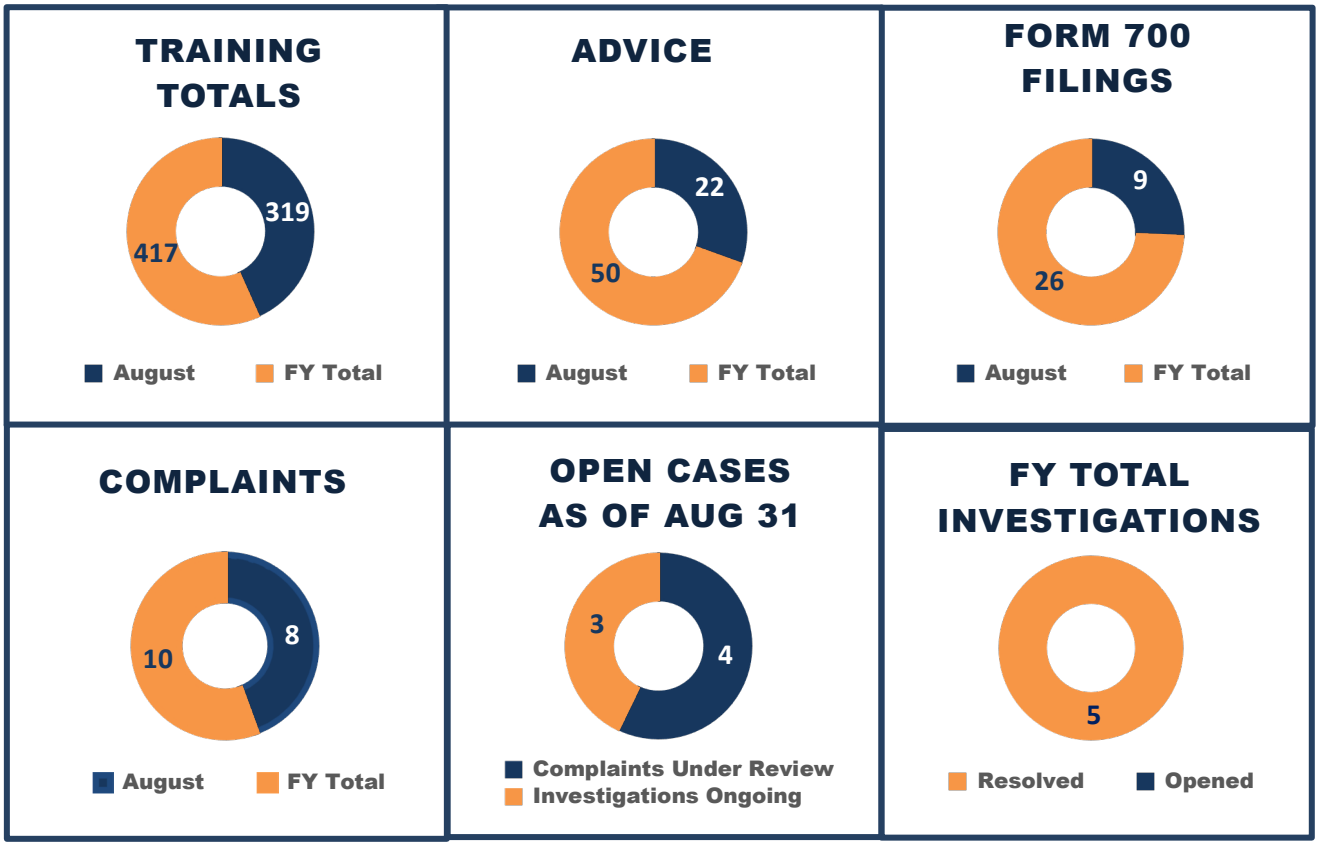
OFFICE OF ETHICS

Report for August 2026



EDUCATION Program

Staff presented Ethics Office overviews at two new employee orientation sessions hosted by Human Resources and three *Government Ethics 101* training sessions for 302 employees. Staff also presented on ethics considerations of inspection trips at the *Member Agency Inspection Trip Coordinator Annual Planning Meeting* held at Union Station.

Ethics staff participated in continuing education:

- *Employee Dynamics: Ethical Drift of the Employer Relationship* presented by EQS Group.
- *Employment Law Update* 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 managing and troubleshooting the electronic filing system. Staff addressed 60 compliance-related matters for directors and employees relating to Form 700.

AB 1234 Ethics Training Compliance – Staff assisted 37 employees with AB 1234 ethics training requirements. Assistance included notifications, troubleshooting the online training program, and obtaining training certificates. A total of 12 employees completed their training this month. One director and 139 employees have not submitted their ethics training certificate to the Ethics Office. Staff continues efforts to reach 100% compliance.

ADVICE Program

Staff addressed 22 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, gifts, and other ethics-related topics.

Advice questions included:

- What are the ethics implications where a Metropolitan official who serves as a nonprofit Board member faces a decision at Metropolitan involving that nonprofit?
- May a workgroup accept a gift with purchase from a Metropolitan vendor in connection with a Metropolitan purchase?
- What are the ethics considerations related to Metropolitan officials' involvement in ballot measures?
- May a Metropolitan official accept a prize from Metropolitan?
- Does a Form 700 filer need to report specific stocks held by their spouse?

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 eight new complaints in August alleging the following:

1. Employee misused MWD resources for personal gain. [Status: under review.]

2. Employee violated MWD rule on political activities. [Status: closed after preliminary review.]
3. Employee unsafe driving at MWD facility. [Status: referred to Security Services.]
4. Manager retaliated against an employee for reporting a workplace concern. [Status: under review.]
5. Manager retaliated against an employee for reporting public safety concern. [Status: under review.]
6. Manager misused their position or authority to personally benefit certain employees. [Status: closed after preliminary review.]
7. Manager improperly released confidential information. [Status: closed after preliminary review.]
8. Manager retaliated against employee for protected labor activity [Status: under review]

Complaints Closed – The Ethics Office closed five complaints alleging ethics violations through the preliminary review process. It took an average of 10 calendar days to complete the preliminary reviews.

1. Employee used MWD resources for personal gain. [Basis: Evidence reviewed did not support the allegation.]
2. Employee provided confidential recruitment information to advantage a job candidate. [Basis: Evidence reviewed did not support the allegation.]
3. Employee violated MWD rule on political activities. [Basis: Evidence reviewed did not support the allegation.]
4. Manager misused their position or authority to personally benefit certain employees. [Basis: Evidence reviewed did not support the allegation.]
5. Manager improperly released confidential information. [Basis: Evidence reviewed did not support the allegation.]

Investigations Resolved – The Ethics Officer determined there were no ethics violations in two cases following formal investigations. The two cases involved separate instances of Metropolitan employees misusing their position or the authority of their position for personal gain. In both cases, it was determined that the evidence reviewed did not support the allegations. These cases are now closed. It took an average of four months to complete these investigations.

Open Complaints and Investigations – As of August 31, 2026, the Investigation Program was managing a total of four open ethics complaints under preliminary review and three ongoing ethics investigations. All three investigations allege misuse of authority for personal gain and are expected to be completed within the next 30-60 days. Two were opened in March, and one in April.

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

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.