The Metropolitan Water District of Southern California

Agenda

The mission of the Metropolitan Water District of Southern California is to provide its service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Ethics Committee
K. Seckel, Chair
G. Cordero, Vice Chair
C. Barrera
P. Daniels
C. Douglas
M. Katz
J. Lewitt
T. McCoy
R. Pakala
P. Paule
M. Ramos
G. Shepherd Romey

Ethics Committee - Final - Revised 1

Meeting with Board of Directors *

November 10, 2026

9:00 a.m.

Tuesday, November 10, 2026 Meeting Schedule

08:00 a.m. CWC
09:00 a.m. ETHICS
10:30 a.m. BREAK
11:00 a.m. SP JT BOD/EXEC

To livestream the meetings on the internet: click here.

Members of the public may present their comments to the Board and Committees on matters within their jurisdiction in real-time during the public comment section of the meeting by teleconference and in-person. To attend remotely or to provide public comment dial 1-877-853-5257 and enter meeting ID: 862 4397 5848 or to join through the internet click here.

Written public comments sent to BoardPublicComment@mwdh2o.com and received by 3:00 p.m. the business day before the meeting is scheduled are sent to the Board and will be posted under the Submitted Items and Responses tab available here: https://mwdh2o.legistar.com/Legislation.aspx. Written comments not received on time will not be included in the record for that meeting. Comments within the subject matter jurisdiction will be sent after the meeting for the record of the next meeting.

Disclaimer: Written and oral public comments are received in compliance with the Ralph M. Brown Act. Please note that Metropolitan does not endorse or ensure the accuracy or reliability of the information provided as public comment or by third parties.

MWD Headquarters Building • 700 N. Alameda Street • Los Angeles, CA 90012
Teleconference Locations:
3008 W. 82nd Place • Inglewood, CA 90305
11973 Fuerte Drive • El Cajon, CA 92020

US2-456

* The Metropolitan Water District's meeting of this Committee is noticed as a joint committee meeting with the Board of Directors for the purpose of compliance with the Brown Act. Members of the Board who are not assigned to this Committee may participate as members of the Board, whether or not a quorum of the Board is present. In order to preserve the function of the committee as advisory to the Board, members of the Board who are not assigned to this Committee will not vote on matters before this Committee.

* 11092026 Ethics Committee Translated Agendas **21651**

Attachments: 11102026 ETHICS Agenda - Armenian
11102026 ETHICS Agenda - Chinese Mandarin
11102026 ETHICS Agenda - Spanish

Agendas are translated by a digital translation service. Metropolitan does not guarantee accuracy of any translation.

1. Opportunity for members of the public to address the committee on matters within the committee's jurisdiction (As required by Gov. Code Section 54954.3(a))

**** CONSENT CALENDAR ****

2. COMMITTEE ACTION (ONLY)

A. Approve the Minutes of the Ethics Committee held on October 12, 2026 **21-6345**

Attachments: 11092026 Ethics 2A (10122026) Minutes

3. COMMITTEE ITEMS (FOR BOARD CONSIDERATION)

NONE

**** END OF CONSENT CALENDAR ****

4. COMMITTEE ITEMS (ACTION FOR BOARD CONSIDERATION)

NONE

5. COMMITTEE ITEMS (INFORMATIONAL FOR BOARD CONSIDERATION)

NONE

6. COMMITTEE ITEMS (INFORMATIONAL)

a Discussion on amendment to lobbying definition in the Administrative Code **21-6344**

Attachments: 11102026 ETHICS 6a C-L
11102026 ETHICS 6a Presentation

b. Ethics Office Investigation Procedures: A Preview of January Item and Opportunity for Input **21-6384**

Attachments: 11102026 ETHICS 6b C-L
11102026 ETHICS 6b Presentation

7. MANAGEMENT ANNOUNCEMENTS AND HIGHLIGHTS

a. Ethics Officer's report on monthly activities **21-6346**

Attachments: 11102026 ETHICS 7a Ethics Officer's report on monthly activities

8. FOLLOW-UP ITEMS

a. Ethics Complaint Data: Fiscal Years 2022-2026. [SUBJECT ADDED on 11/2/2026] **21-6475**

Attachments: 11102026 ETHICS 8a Presentation

9. FUTURE AGENDA ITEMS

10. ADJOURNMENT

NOTE: This committee reviews items and makes a recommendation for final action to the full Board of Directors. Final action will be taken by the Board of Directors. Committee agendas may be obtained on Metropolitan's Web site https://mwdh2o.legistar.com/Calendar.aspx. This committee will not take any final action that is binding on the Board, even when a quorum of the Board is present.

Writings relating to open session agenda items distributed to Directors less than 72 hours prior to a regular meeting are available for public inspection at Metropolitan's Headquarters Building and on Metropolitan's Web site https://mwdh2o.legistar.com/Calendar.aspx.

Requests for a disability-related modification or accommodation, including auxiliary aids or services, in order to attend or participate in a meeting should be made to the Board Executive Secretary in advance of the meeting to ensure availability of the requested service or accommodation.

The Metropolitan Water District of Southern California

Agenda

The mission of the Metropolitan Water District of Southern California is to provide its service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Էթիկայի հանձնաժողով

Կ. Սեքել, նախագահ
Գ. Կորդերո, փոխնախագահ
Ք. Բարերա
Պ. Դանիելս
Ք. Դուգլաս
Մ. Կաց
Ջ. Լյուիթ
Թ. Մաքքոյ
Ռ. Պակալա
Պ. Պաուլե
Մ. Ռամոս
Գ. Շեփերդ Ռոմի

Էթիկայի հանձնաժողովի -եզրափակիչ

Հանդիպում տնօրենների խորհրդի հետ *

2026 թվականի նոյեմբերի 10-ին

9:00-ին

Երեքշաբթի, 10 նոյեմբերի, 2026թ. Հանդիպման ժամանակացույց
08:00 a.m. CWC 09:00 a.m. Էթիկա 10:30-ին ընդմիջում 11:00 am SP JT Տնօրենների խորհրդի/Գործադիր տնօրեն

Հանդիպումները ինտերնետում ուղիղ հեռարձակմամբ դիտելու համար սեղմեք այստեղ :

Հանրության անդամները կարող են իրենց իրավասությանը ենթակա հարցերի վերաբերյալ իրենց մեկնաբանությունները ներկայացնել խորհրդին և կոմիտեներին՝ -նիստի հանրային մեկնաբանությունների բաժնի ընթացքում՝ հեռախոսակապով և անձամբ: Հեռակա մասնակցելու կամ հանրային մեկնաբանություն տալու համար զանգահարեք 18778535257 հեռախոսահամարով և մուտքագրեք հանդիպման ID-ն՝ 862 4397 5848, կամ ինտերնետի միջոցով միանալու համար սեղմեք այստեղ :

BoardPublicComment@mwdh 2 o . com հասցեին ուղարկված և նիստից մեկ աշխատանքային օր առաջ՝ ժամը 15:00-ին ստացված գրավոր հանրային մեկնաբանությունները ուղարկվում են Խորհրդին և կտեղադրվեն «Ներկայացված նյութեր և պատասխաններ» բաժնում, որը հասանելի է այստեղ՝ https :// mwdh 2 o . legistar . com / Legislation . aspx : Ժամանակին չստացված գրավոր մեկնաբանությունները չեն ներառվի տվյալ նիստի արձանագրության մեջ: Թեմայի իրավասության շրջանակներում մեկնաբանությունները կուղարկվեն նիստից հետո՝ հաջորդ նիստի արձանագրության համար:

Հրաժարում պատասխանատվությունից. Գրավոր և բանավոր հանրային մեկնաբանությունները ստացվում են Ռալֆ Մ. Բրաունի օրենքի համաձայն: Խնդրում ենք նկատի ունենալ, որ Մետրոպոլիտենը չի հաստատում կամ չի ապահովում հանրային մեկնաբանությունների կամ երրորդ կողմերի կողմից տրամադրված տեղեկատվության ճշգրտությունը կամ հուսալիությունը:

* Այս կոմիտեի Մետրոպոլիտեն ջրային շրջանի նիստը համարվում է տնօրենների խորհրդի հետ համատեղ կոմիտեի նիստ՝ Բրաունի ակտի պահանջներին համապատասխանելու նպատակով: Այս կոմիտեին չնշանակված խորհրդի անդամները կարող են մասնակցել որպես խորհրդի անդամներ՝ անկախ նրանից, թե խորհրդի քվորումը ներկա է , թե ոչ : Կոմիտեի՝ որպես խորհրդի խորհրդատվական գործառույթը պահպանելու համար , այս կոմիտեին չնշանակված խորհրդի անդամները չեն քվեարկի այս կոմիտեի քննարկմանը ներկայացված հարցերի վերաբերյալ:

* 11092026 Էթիկայի հանձնաժողովի թարգմանված օրակարգեր **21651**

Օրակարգերը թարգմանվում են թվային թարգմանչական ծառայության կողմից: Մետրոպոլիտենը չի երաշխավորում որևէ թարգմանության ճշգրտությունը:

1. Հանրության անդամների համար հանձնաժողովին դիմելու հնարավորություն հանձնաժողովի իրավասության ներքո գտնվող հարցերի վերաբերյալ (ինչպես պահանջվում է Կառավարական օրենսգրքի 54954.3(a) բաժնի համաձայն):

<u>ՀԱՄԱՁԱՅՆՈՒԹՅԱՆ ՕՐԱԳՈՒՅՑ**</u>**

2. ՀԱՆՁՆԱԺՈՂՈՎԻ ԳՈՐԾՈՂՈՒԹՅՈՒՆ (ՄԻԱՅՆ)

Ա. Հաստատել 2026 թվականի հոկտեմբերի 12-ին կայացած Էթիկայի հանձնաժողովի արձանագրությունը: **21 -6345**

<u>Կից ֆայլեր</u> ՝ 11092026 Էթիկա 2Ա (10122026) Արձանագրություն

3. ՀԱՆՁՆԱԺՈՂՈՎԻ ՀԱՐՑԵՐ (ԽՈՐՀՐԴԻ ՔՆՆԱՐԿՄԱՆ ՀԱՄԱՐ)

ՈՉԻՆՉ

<u> ՀԱՄԱՁԱՅՆՈՒԹՅԱՆ ՕՐԱԳՈՒՅՑԻ ԱՎԱՐՏ **</u>**

4. ՀԱՆՁՆԱԺՈՂՈՎԻ ԿԵՏԵՐ (ԳՈՐԾՈՂՈՒԹՅՈՒՆ ԽՈՐՀՐԴԻ ՔՆՆԱՐԿՄԱՆ ՀԱՄԱՐ)

ՈՉԻՆՉ

5. ՀԱՆՁՆԱԺՈՂՈՎԻ ԿԵՏԵՐ (ՏԵՂԵԿԱՏՎԱԿԱՆ՝ ԽՈՐՀՐԴԻ ՔՆՆԱՐԿՄԱՆ ՀԱՄԱՐ)

ՈՉԻՆՉ

6. ՀԱՆՁՆԱԺՈՂՈՎԻ ԿԵՏԵՐ (ՏԵՂԵԿԱՏՎԱԿԱՆ)

մի Քննարկում Վարչական օրենսգրքում լոբբինգի սահմանման փոփոխության վերաբերյալ **21 -6344**

բ. Էթիկայի գրասենյակի հետաքննության ընթացակարգեր. հուսվար ամսվա հարցի նախնական ակնարկ և մասնակցության հնարավորություն **21 -6384**

7. Ղեկավարության հայտարարություններ և կարևորագույն փաստեր

ա. Էթիկայի պատասխանատուի ամսական գործունեության մասին զեկույցը **21 -6346**

8. Հետևողական -նյութեր

ՈՉԻՆՉ

9. Ապագա օրակարգի կետեր

10. ՀԵՏԱՁԳՈՒՄ

ՆՇՈՒՄ. Այս հանձնաժողովը քննարկում է հարցերը և վերջնական որոշում կայացնելու առաջարկություն է անում տնօրենների խորհրդին: Վերջնական որոշումը կկայացնի տնօրենների խորհուրդը: Հանձնաժողովի օրակարգերը կարելի է ստանալ Մետրոպոլիտենի կայքէջում՝ https://mwdh2o.legistar.com/Calendar.aspx: Այս հանձնաժողովը չի կայացնի որևէ վերջնական որոշում, որը պարտադիր է խորհրդի համար, նույնիսկ եթե խորհրդի անդամները ներկա են:

Բաց նիստի օրակարգի հարցերի վերաբերյալ գրավոր նյութերը, որոնք տնօրեններին տրամադրվել են հերթական նիստից 72 ժամ առաջ, հասանելի են հանրային ծանոթացման համար Մետրոպոլիտենի գլխավոր գրասենյակի շենքում և Մետրոպոլիտենի կայքում՝ https://mwdh2o.legistar.com/Calendar.aspx:

Հաշմանդամության -հետ կապված փոփոխության կամ հարմարեցման, այդ թվում՝ օժանդակ միջոցների կամ ծառայությունների վերաբերյալ հարցումները, որոնք նախատեսված են նիստին մասնակցելու կամ մասնակցելու համար, պետք է ներկայացվեն Խորհրդի գործադիր քարտուղարին նիստից առաջ՝ պահանջվող ծառայության կամ հարմարեցման հասանելիությունն ապահովելու համար :

The Metropolitan Water District of Southern California

Agenda

The mission of the Metropolitan Water District of Southern California is to provide its service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

伦理委员会

K. Seckel，主席
G. Cordero，副主席
C. 巴雷拉
P·丹尼尔斯
C·道格拉斯
M·卡茨
J·莱维特
T·麦考伊
R.帕卡拉
保拉
M. Ramos
G·谢泼德·罗梅

伦理委员会-最终版

与董事会会议*

2026年11月10日

上午9:00

2026年11月10日，星期二 **会**议日程
上午 8:00 CWC **上午 9:00** 伦理 **上午 10:30 休息** **上午 11:00 SP JT BOD/EXEC**

要通过互联网直播会议，请点击这里。

公众可通过电话会议或现场参会，在会议的公众评议环节实时向理事会和各委员会就其管辖范围内的事项发表意见。如需远程参会或发表公众意见，请拨打 **18778535257 并**输入会议 **ID：862 4397 5848**；**或-点**击此处通过网络加入会议。

公众提交的书面意见，请发送至**BoardPublicComment@mwdh2o.com，并在会**议召开前一个工作日的下午 **3:00 前收到。**这些意见将提交给委员会，并发布在**“已提交事**项及回复”标签页下，该标签页可在此处查看：**https://mwdh2o.legistar.com/Legislation.aspx。未按**时收到的书面意见将不被纳入本次会议的记录。与会议主题相关的意见将在会后提交，以供下次会议记录。

免责声明：根据《拉尔夫·**M·布朗法案》，公众可提交**书面和口头意见。请注**意，大都会医**疗中心不对公众意见或第三方提供的信息的准确性或可靠性进行认可或保证。

MWD总部大楼 **• 北阿拉米达街700号 • 洛杉**矶，加利福尼亚州 **90012**

电话会议地点：

加利福尼亚州英格尔伍德市西**82街3008号，**邮编**90305**

US2 -456

*

为遵守《布朗法案》，大都会水务局的本委员会会议将与董事会联合召开。未分配到本委员会的董事会成员可以作为董事会成员参加会议，无论董事会是否达到法定人数。为确保委员会作为董事会咨询机构的职能，未分配到本委员会的董事会成员将不参与本委员会审议事项的投票。

* 11092026 伦理委员会翻译议程 21651

议程由数字翻译服务翻译。大都会酒店集团不保证任何翻译的准确性。

1. 公众有机会就委员会管辖范围内的事项向委员会发言（根据政府法典第54954.3(a) 条的规定）

同意书日历

2. 委员会行动（仅限）

a. 批准2026年10月12日举行的伦理委员会会议纪要。 **21 -6345**

附件： 11092026 伦理 2A (10122026) 会议记录

3. 委员会事项（供董事会审议）

没有任何

同意书日历结束

4. 委员会事项（供董事会审议）

没有任何

5. 委员会事项（供董事会参考）

没有任何

6. 委员会事项（信息性）

a. 关于修订《行政法典》中游说定义的讨论 **21 -6344**

b. 道德办公室调查程序：一月份议程预览及意见征询机会 **21 -6384**

7. 管理层公告及亮点

a. 道德官关于月度活动的报告 21 -6346

8. 后续-事项

没有任何

9. 未来议程项目

10. 休会

注：本委员会负责审核各项议题，并向全体董事会提出最终行动建议。最终行动由董事会做出。委员会议程可在**Metropolitan网站https://mwdh2o.legistar.com/Calendar.aspx上**查阅。即使董事会达到法定人数，本委员会也不会做出任何对董事会具有约束力的最终决**定。**

与公开会议议程项目相关的书面材料，如果在例会召开前不到 **72 小**时分发给董事，则可在大都会总部大楼和大都会网站 **https://mwdh2o.legistar.com/Calendar.aspx 上供公众**查阅。

如需残疾-相关的调整或便利措施（包括辅助工具或服务）以便参加会议，应提前向董事会执行秘书提出申请，以确保所要求的服务或**便利措施能**够提供。

The Metropolitan Water District of Southern California

Agenda

The mission of the Metropolitan Water District of Southern California is to provide its service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Comité de Ética

K. Seckel, Presidente
G. Cordero, Vicepresidente
C. Barrera
P. Daniels
C. Douglas
M. Katz
J. Lewitt
T. McCoy
R. Pakala
P. Paule
M. Ramos
G. Shepherd Romey

Decisión final del Comité de Ética-

Reunión con la Junta Directiva *

10 de noviembre de 2026

9:00 a. m.

Martes, 10 de noviembre de 2026
Calendario de reuniones

08:00 am CWC
09:00 h ÉTICA
10:30 am DESCANSO
11:00 am SP JT JOD/EXEC

Para ver las reuniones en directo por internet: haga clic aquí .

Los miembros del público pueden presentar sus comentarios a la Junta y a los Comités sobre asuntos de su competencia en -tiempo real durante la sección de comentarios públicos de la reunión, tanto por teleconferencia como en persona. Para asistir de forma remota o para presentar comentarios públicos, marque 18778535257 e ingrese el ID de la reunión: 862 4397 5848 o, para unirse por internet, haga clic aquí .

escrito enviados a BoardPublicComment@mwdh2o.com y recibidos antes de las 15:00 horas del día hábil anterior a la reunión programada se enviarán a la Junta y se publicarán en la pestaña "Elementos y respuestas presentados", disponible aquí: https://mwdh2o.legistar.com/Legislation.aspx . Los comentarios por escrito que no se reciban a tiempo no se incluirán en el acta de esa reunión. Los comentarios que se encuentren dentro de la jurisdicción temática se enviarán después de la reunión para el acta de la siguiente reunión .

Descargo de responsabilidad: Los comentarios públicos, tanto escritos como orales, se reciben de conformidad con la Ley Ralph M. Brown. Tenga en cuenta que Metropolitan no respalda ni garantiza la exactitud ni la fiabilidad de la información proporcionada en los comentarios públicos ni por terceros.

Edificio de la sede central de MWD • 700 N. Alameda Street • Los Ángeles, CA 90012
Ubicaciones para teleconferencias:
3008 W. 82nd Place • Inglewood, CA 90305

---

* La reunión de este Comité del Distrito Metropolitano de Agua se convoca como una reunión conjunta con la Junta Directiva para el cumplimiento de la Ley Brown. Los miembros de la Junta que no estén asignados a este Comité podrán participar como miembros de la Junta, independientemente de si hay o no quórum. Para preservar la función consultiva del Comité ante la Junta, los miembros de la Junta que no estén asignados a este Comité no votarán en los asuntos que se presenten ante él.

* 11092026 Comité de Ética Agendas traducidas **21651**

Los programas se traducen mediante un servicio de traducción digital. Metropolitan no garantiza la exactitud de ninguna traducción.

1. Oportunidad para que los miembros del público se dirijan al comité sobre asuntos dentro de la jurisdicción del comité (Según lo exige la Sección 54954.3(a) del Código Gubernamental).

**** CALENDARIO DE CONSENTIMIENTO ****

2. DECISIÓN DEL COMITÉ (SOLO)

A. Aprobar el acta de la reunión del Comité de Ética celebrada el 12 de octubre de 2026. **21 -6345**

Archivos 11092026 Ética 2A (10122026) Actas

3. ASUNTOS DEL COMITÉ (PARA CONSIDERACIÓN DE LA JUNTA

NINGUNO

**** FIN DEL CALENDARIO DE CONSENTIMIENTO ****

4. ASUNTOS DEL COMITÉ (PARA CONSIDERACIÓN DE LA JUNTA

NINGUNO

5. ASUNTOS DEL COMITÉ (INFORMACIÓN PARA LA CONSIDERACIÓN DE LA JUNTA DIRECTIVA)

NINGUNO

6. PUNTOS DEL COMITÉ (INFORMATIVOS)

a Debate sobre la enmienda a la definición de cabildeo en el Código Administrativo. **21 -6344**

b. Procedimientos de investigación de la Oficina de Ética: Avance del tema de enero y oportunidad para aportar ideas. **21 -6384**

7. ANUNCIOS Y ASPECTOS DESTACADOS DE LA GERENCIA

a. Informe del responsable de ética sobre las actividades mensuales **21 -6346**

8. ELEMENTOS DE SEGUIMIENTO-

NINGUNO

9. PUNTOS DEL ORDEN DEL DÍA FUTURO

10. APLAZAMIENTO

NOTA: Este comité revisa los asuntos y formula una recomendación para su aprobación final ante la Junta Directiva en pleno. La Junta Directiva tomará la decisión final. Las agendas de los comités pueden consultarse en el sitio web de Metropolitan: https://mwdh2o.legistar.com/Calendar.aspx. Este comité no tomará ninguna decisión final vinculante para la Junta Directiva, incluso cuando haya quórum.

Los documentos relacionados con los puntos del orden del día de las sesiones públicas que se distribuyen a los directores con menos de 72 horas de antelación a una reunión ordinaria están disponibles para su consulta pública en el edificio de la sede de Metropolitan y en el sitio web de Metropolitan: https://mwdh2o.legistar.com/Calendar.aspx.

Las solicitudes de modificaciones o adaptaciones relacionadas con la discapacidad -, incluidas las ayudas o servicios auxiliares, para asistir o participar en una reunión, deben dirigirse al Secretario Ejecutivo de la Junta con antelación a la reunión para garantizar la disponibilidad del servicio o la adaptación solicitada.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

MINUTES

ETHICS COMMITTEE

October 12, 2026

Chair Seckel called the meeting to order at 12:35 p.m.

Members present: Directors Barrera, Cordero, Douglas (teleconference posted location), Katz, Lewitt (entered after roll call), McCoy, Pakala, Paule, Ramos, and Seckel.

Members absent: Directors Daniels and Shepherd Romey.

Other Board Members present: Directors Bryant, Crane, Dennstedt, Erdman, Faessel, Fellow, Fong-Sakai, Garza, Jay, Miller, and Ortega.

Committee Staff present: Beatty, Deshmukh, Hudson, Rodriguez, Rubin, Salinas, and Shope

1. OPPORTUNITY FOR MEMBERS OF THE PUBLIC TO ADDRESS THE COMMITTEE ON MATTERS WITHIN THE COMMITTEE'S JURISDICTION

None

CONSENT CALENDAR

Director Lewitt entered the meeting.

2. COMMITTEE ACTION (ONLY)

A. Subject: Approval of the Minutes of the Ethics Committee for September 15, 2026

3. COMMITTEE ITEMS (FOR BOARD CONSIDERATION)

None

Director Pakala made a motion, seconded by Director McCoy to approve the consent calendar consisting of item 2A.

The vote was:

Ayes:	Directors Cordero, Douglas, Katz, Lewitt, McCoy, Pakala, Paule, Ramos, and Seckel
Noes:	None
Abstentions:	Director Barrera
Absent:	Directors Daniels and Shepherd Romey

The motion for item 2A passed by a vote of 9 ayes, 0 noes, 1 abstention, and 2 absent.

**** END OF CONSENT CALENDAR ****

4. COMMITTEE ITEMS (ACTION FOR BOARD CONSIDERATION)

None

5. COMMITTEE ITEMS (INFORMATIONAL FOR BOARD CONSIDERATION)

None

6. COMMITTEE ITEMS (INFORMATIONAL)

a. Subject: Ethics Education: Overview of Ethics Rule

Presented by: Kelli Shope, Assistant Ethics Officer

Kelli Shope, Assistant Ethics Officer, presented a brief refresher on two key conflicts of interest rules: 1) Conflicts of Interests in Government Decisions and 2) Conflicts of Interests in Government Contracts.

The following Director provided comments or asked questions:

1. Seckel

b. Subject: Ethics Office Overview, Part II

Presented by: Abel Salinas, Ethics Officer

Abel Salinas, Ethics Officer provided a continuation of a summary of the Ethics Office's mission, core programs, and investigation statistics.

The following Directors provided comments or asked questions:

1. Paule
2. Ortega
3. Ramos

Staff responded to the Directors questions and comments.

c. Subject: Proposed Revisions to the Ethics Rules: Presentation of Preliminary Proposal and Opportunity for Feedback

Presented by: Kelli Shope, Assistant Ethics Officer

Kelli Shope, Assistant Ethics Officer presented proposed revisions to ethics rules and solicited committee feedback prior to finalizing preliminary proposal.

The following Directors provided comments or asked questions:

1. Ortega
2. Ramos
3. Garza
4. Katz
5. Cordero
6. Paule
7. Lewitt
8. Fong-Sakai
9. Crane

Staff responded to the Directors questions and comments.

d. Subject: Review of Ethics Office Investigation Procedures: A Preview of January Item and Opportunity for Input

Item Deferred

7. MANAGEMENT ANNOUNCEMENTS AND HIGHLIGHTS

a. Subject: Ethics Officer's report on monthly activities

The Ethics Officer’s report was received and filed.

8. FOLLOW-UP ITEMS

Ethics staff to present on the "Proposed Revisions to the Ethics Rules" for another opportunity to solicit Committee feedback.

9. FUTURE AGENDA ITEMS

10. ADJOURNMENT

The meeting adjourned at 2:01 p.m.

Karl Seckel
Chair

Ethics Committee

11/10/2026 Committee Meeting

6a

Subject

Discussion on amendment to lobbying definition in the Administrative Code.

Background

Item 6a provides a brief overview of Metropolitan's lobbying program and options for potential revision. Staff will solicit feedback from the Committee and bring the item back in December for action.

In November 2021, the Board of Directors approved a package of ethics-related amendments to the Administrative Code including new lobbying registration and reporting requirements. The first of its kind at Metropolitan, the lobbying program began as a comparatively modest program. As of October 2026, there were five registered lobbyists.

Metropolitan's lobbying rules generally require that external individuals and entities that are compensated $2,000 or more in a calendar month to influence Metropolitan officials on a specific Metropolitan decision register as lobbyists and file quarterly lobbying reports. The definition of lobbyist includes several carveouts based on the type of individual engaging in lobbying activities and the type of Metropolitan decision involved.

Five years after establishing the lobbying program, the Ethics Officer proposes to expand the definition of lobbyist to capture additional lobbying activity at Metropolitan. There are several options for expansion. This item primarily stems from director feedback, Senate Bill 60's (SB 60) emphasis on lobbying and disclosure rules, the public interest in transparency, and surveying other lobbying programs.

Prior Lobbying Items at Committee and Board

In November 2021, the Board approved establishing the first, and current, lobbying registration and reporting program to comply with the SB 60 mandate to adopt rules on lobbying activity.

In September 2025, the Ethics Office presented an overview of Metropolitan's lobbying registration and reporting program to the Community and Workplace Culture Committee (then the Ethics Office home committee).

In October 2026, the Ethics Office discussed expanding the definition of lobbyist with the Ethics Committee. The Committee requested an additional information item to discuss further.

Options for Consideration

The Ethics Office proposes expanding the definition of "lobbyist" which would increase transparency surrounding paid communications to influence Metropolitan officials on Metropolitan decisions. Expansion can take many forms. Below is a summary of current lobbying registration and reporting requirements and potential options for expansion.

Current: The Administrative Code establishes registration and quarterly reporting requirements for individuals and entities qualifying as a lobbyist. Lobbyists must register with the Ethics Office prior to their communications with Metropolitan officials and submit quarterly reports disclosing topics of attempts to influence, names of lobbyist employers, and whether the contacts were with directors or staff (Section 7220).

"Lobbyist" generally means an individual paid $2,000 or more in a month to influence Metropolitan officials on a specific Metropolitan decision on another's behalf. (Section 7103(l)).

Carveouts to the definition of lobbyist:

- Internal and external lobbyists representing government agencies, including member agencies.
- Individuals only making oral statements during a public hearing or written statements as part of the public record.
- Individual employees of private entities (other than lobbying firms), such as executives and employees of engineering firms.
- Individuals attempting to influence only decisions involving ministerial acts, personnel matters, and collective bargaining.

Proposed: The lobbyist registration and reporting program can be expanded in several ways. One option is to expand transparency by amending the Administrative Code to require consistent reporting of certain lobbying activities regardless of how much an individual is paid to engage in those activities, or who employs them to do so. Under this option, the Code would extend registration requirements to a wider range of individuals and entities by expanding who qualifies as a lobbyist, thereby expanding disclosure of lobbying activities at Metropolitan. To accomplish this, the Administrative Code would be amended to:

1. Eliminate the $2,000 compensation threshold and replace it with an "any compensation" threshold.
    - This approach would emphasize capturing those who engage in lobbying regardless of how much they are paid to do so.
2. Eliminate the carveout for "internal" lobbying by employees of private entities seeking to influence Metropolitan decisions (e.g., employees of engineering firms and nonprofit organizations).
    - The Ethics Office proposes to add a carveout for these individuals when their only communication is with Metropolitan staff identified as authorized contacts in a formal RFQ or RFP process.

The purpose of the proposed changes is to have consistent transparency requirements among the various external individuals who lobby Metropolitan officials to influence Metropolitan decisions without respect to (1) how much they are paid to do so, (2) whether they lobby as an internal or external representative of the entity on whose behalf they are lobbying, or (3) their job title.

To ensure that the focus is on capturing meaningful disclosure, Administrative Code language may also be amended to exclude certain activities from the definition of lobbyist such as one-time generic, unsolicited email blasts offering a product or a response to a communication initiated by a Metropolitan official to solicit interest in providing a needed service to Metropolitan.

The Ethics Office recommends the following features of the lobbying program remain unchanged:

- No prohibition on lobbying activities (except for the limited post-employment lobbying ban for former Metropolitan officials).
- No lobbyist registration fee.
- No requirement for Metropolitan officials to report when they have been lobbied.
- No additional information required on registration forms or quarterly reports.
- Carveouts for decisions involving ministerial acts, personnel matters, and collective bargaining.
- Carveouts for government officials and external lobbyists of government entities communicating on behalf of government entities.

Applicable Policies

Administrative Code § 7200. Policy

The policy of Metropolitan is to maintain the highest standards of conduct from persons doing business with Metropolitan. Accordingly, it is the policy of Metropolitan that contractors and those attempting to influence Metropolitan decisions shall maintain the highest standard of personal honesty and fairness in dealing with Metropolitan and in carrying out duties on behalf of Metropolitan. This policy sets forth the minimal ethical standards to be followed by Metropolitan contractors, lobbying firms, and lobbyists.

Administrative Code § 7103. Definition of Terms.

(l) "Lobbyist" means any individual who receives or is entitled to receive $2,000 or more in economic consideration in a calendar month, other than reimbursement for reasonable travel expenses, to communicate directly with a Metropolitan official for the purpose of influencing a specific decision of any Metropolitan official, including a decision to enter into a contract. For purposes of this definition, oral statements made during a public hearing or written statements made as part of the public record shall not be considered communications for the purpose of influencing a decision of any Metropolitan official. Individuals employed by, retained by, or

holding office with other governmental agencies and individual employees of private entities, other than lobbying firms, seeking to influence a Metropolitan decision are not lobbyists. Decisions involving ministerial acts, personnel matters, and collective bargaining shall not be considered "decisions" for purposes of this definition.

(k) "Lobbying firm" means 1) any business entity, including an individual contract lobbyist, which receives compensation for the purpose of influencing a specific decision of any Metropolitan official including a decision to enter into a contract, and 2) any owner or employee of the business entity is a lobbyist.

Administrative Code § 7220. Lobbyist and Lobbying Firm Registration and Reporting Requirements.

The Ethics Officer shall prescribe forms to comply with the requirements of this section and shall make all information listed on any registration statement and all quarterly disclosures publicly available on the Metropolitan public website within 14 calendar days of filing.

(a) Lobbyists shall file a registration statement with the Ethics Officer prior to communicating with a Metropolitan official for the purpose of influencing a decision of a Metropolitan official. The registration statement shall include the lobbyist's full name, business address, email address, telephone number and name of lobbying firm owned by the lobbyist or employing lobbyist.

(b) Lobbyists shall file quarterly reports with the Ethics Officer disclosing all topics they attempted to influence, the name of the lobbyist employer for whom they were engaged for the purpose of influencing, and whether they communicated with board members and/or staff members. Reports shall be due on or before the last day of the month following each calendar quarter.

(c) Lobbying firms shall file a registration statement with the Ethics Officer at the same time the firm's lobbyist registers. The registration statement shall include the lobbying firm's name, business address, email address, telephone number, lobbyist employed by or who owns the firm, and name of the entity compensating the lobbying firm.

(d) Lobbying firms shall file quarterly reports with the Ethics Officer disclosing the names of lobbyists who own or are employed by the firm, all topics the firm's lobbyists attempted to influence, and the name of the entity for whom the firm is compensated for the purpose of influencing. Reports shall be due on or before the last day of the month following each calendar quarter.

(e) Lobbyists and lobbying firms which have ceased lobbying Metropolitan officials shall file a termination statement with the Ethics Officer.

Abel Salinas 11/3/2026

Abel Salinas *Date*
Ethics Officer

Ethics Committee

Discussion on amendment to lobbying definition in the Administrative Code

Item 6a

November 10, 2026

Presented by: Kelli Shope

Item 6a

Subject

Discussion on amendment to lobbying definition in the Administrative Code

Purpose

To further discuss options for expanding transparency of lobbying activities

Background

Ethics Office Responsibilities for Rulemaking

- SB 60 and Metropolitan Administrative Code: develop ethics rules for Board adoption

- SB 60 requires adoption of rules related to lobbying

Most Recent Administrative Code Amendments

- 2021 Overhaul – After multi-year review, new ethics rules developed in collaboration with outside and internal legal counsel and adopted by the Board

  - ❖ Included a new Lobbyist registration and reporting program

What is the Purpose Behind Lobbying Rules?

- Transparency to the public about who is spending money to communicate with Metropolitan officials to influence government decisions
  - Common feature of government ethics agencies
  - Communications are not prohibited (except for limits on former officials); focus is on disclosure
  - Communications at public board meetings are generally exempt because there is already transparency

How is Metropolitan Meeting SB 60 Requirement to Adopt Lobbying Rules?

Current Lobbying Requirements

- ❑ Registration requirement for those meeting the definition of a lobbyist or lobbying firm
- ❑ Quarterly reporting of lobbying activities
- ❑ One year “cooling off period” for former Metropolitan officials

*Discussed last month clarifying the Administrative Code that the ban on employee gifts from “restricted sources” includes gifts from lobbyists

What is Prompting the Proposed Changes to Lobbying Rules?

- Director interest in understanding scope of lobbying activities at Metropolitan
- Limits of current registration and reporting requirements, resulting in very few disclosures compared to other government agencies
- Value of more transparency to the public about paid efforts to influence Metropolitan decisions

What is Shaping the Proposed Changes to Lobbying Rules?

Considerations behind proposed amendments:

- ❑ Experience applying the current lobbying rules for over five years
- ❑ Director and employee feedback
- ❑ Discussions with lobbyists and ethics professionals that regulate lobbying
- ❑ Survey of other jurisdictions' lobbying programs
- ❑ Concerns raised
- ❑ Ethics risk areas
- ❑ Striving for meaningful transparency while avoiding the use of public resources for information not of concern to the public

Proposal

Proposal:
Expand definition of Lobbyist to capture more lobbying activity by external parties.

How?

- ❑ **Change $2,000 compensation threshold to “any compensation”**
- ❑ **Eliminate carveout for “internal” lobbyists**

This “activity-based” standard prioritizes consistent disclosure of paid communications to influence Metropolitan decisions regardless how much one is paid to do so, who they work for, their job title, etc.

Considerations for Avoiding Excessive Disclosure

Additional language can be added to the definitions or FAQs to avoid capturing communications to influence that may not warrant public disclosure such as:

- Communications to influence purely hypothetical matters
- Unsolicited, generalized e-mail blasts offering a product or service
- Responses to Metropolitan-initiated communications seeking information or qualifications about a needed Metropolitan service or product
- Information provided through the proper channels as part of a formal RFQ or RFP process (communications outside proper channels would be captured)

Discussion

Proposal – Next Steps

Ethics Office will:

- Assess Committee feedback and finalize draft Code language
- Review with outside counsel and share with Committee Chair and Vice Chair and Department Heads
- Finalize proposal and draft Code language with outside counsel
- Return to Ethics Committee/Board for action

THE ETHICS OFFICE

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Questions?

THE METROPOLITAN WATER DISTRICT OF
SOUTHERN CALIFORNIA
1928

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Committee Item
INFORMATION

Ethics Committee

11/10/2026 Committee Meeting

6b

Subject

Ethics Office Investigation Procedures: A Preview of January Item and Opportunity for Input

Background

Item 6b provides a brief overview of investigation procedures the Ethics Office is currently reviewing for potential revision. Staff will solicit feedback from the Committee and will bring the item back to the Committee in January for a more detailed discussion.

Metropolitan's ethics investigation procedures were reviewed and overhauled after a multi-year review in the fall of 2021. After five years of applying the procedures, the Ethics Office is reviewing areas for potential amendment. The areas identified for review and analysis stem from staff's experience applying the procedures in ethics complaints and investigations and stakeholder feedback.

After receiving feedback from the Committee, staff will review additional procedures, if requested, draft a preliminary proposal, assess the proposal with outside counsel, and return to the Committee for further discussion in January. After the January meeting, staff will finalize the proposal, seek independent review from outside counsel, and discuss it with the department heads and bargaining units. After these steps are complete, this item is anticipated to return to the Ethics Committee for consideration and proposed action in spring 2027.

Provisions Identified for Review and Potential Amendment

- Amend language to reflect current practice that written investigation notices inform parties of Metropolitan's prohibition on retaliation and confidentiality.
- Clarify that if the General Counsel or other office handles an ethics-related complaint involving Ethics Office staff, the same Administrative Code complaint and investigative procedures applicable to ethics matters are required.
- Clarify the timeframe for completing investigations.
- Clarify the type of information the Ethics Office provides after an investigation to respondents and those responsible for deciding potential action.
- More expressly state that investigation-related information provided to the Executive Committee to resolve director violations must be provided publicly under the Brown Act.
- Provide clarifying language on the levels of violations.
- Identify where mandatory public information on ethics investigations is posted.

- Consider whether substantiated ethics violations involving directors should be referred to the full Board for consideration of further action instead of the Executive Committee. (If responsibility ends with Executive Committee, amend the Administrative Code language to make it more explicit.)
- Make explicit that the Executive Committee (or Board, if desired) only decides on further action, if any.
- Add Administrative Code language specifying that directors may provide comment during the public meeting in which their ethics violation is considered for further action.

Ethics Committee

Proposed Revisions to Ethics Office Investigation Procedures: Preview of January Proposal and Opportunity for Input

Item 6b

November 10, 2026

Presented by: Dominic Berbeo

Item 6b

Subject

Ethics Office Investigation Procedures: A Preview of January Item and Opportunity for Input

Purpose

To solicit Committee feedback prior to developing preliminary proposal.

Background

Considerations for Reviewing Investigation Procedures:

- SB 60 – Ethics Office must:
  - ❑ Operate as an independent entity that is not subject to political influence
  - ❑ Investigate ethics complaints involving employees and directors
  - ❑ Adopt procedures for protecting confidentiality of sources, job security of whistleblowers, and due process rights of the accused
  - ❑ Make ethics investigation results public
  - ❑ Adopt a schedule of penalties for ethics violations

Background (Cont.)

- 2021 Overhaul – After multi-year review, new ethics investigation procedures developed in collaboration with outside and internal legal counsel and adopted by the Board
- 2022 State Auditor Report –
  - Noted that the 2021 investigation procedures were an improvement and recommended additional changes.
  - In 2022, the Ethics Office proposed (and Board approved) amendments to address State Auditor's remaining concerns including:
    - Prohibit interference with Ethics Office investigations, require officials provide all documents during investigations, prohibit interested parties from participating in ethics investigations except when necessary, strengthen Ethics Office independence

Basis for Selecting Procedures for Review

Investigation Procedures under review were selected based on:

- ❑ Experience applying the current investigation procedures for five years
- ❑ Director and other stakeholder feedback

Provisions Identified for Review and Potential Amendment

1. Amend language to reflect current practice that written investigation notices inform parties of Metropolitan's prohibition on retaliation and confidentiality.
2. Clarify that if the General Counsel or other office handles an ethics-related complaint involving Ethics Office staff, the same Administrative Code complaint and investigative procedures applicable to ethics matters are required.
3. Clarify the timeframe for completing investigations.
4. Clarify the type of information the Ethics Office provides after an investigation to respondents and those responsible for deciding potential action.

Provisions Identified for Review and Potential Amendment (Cont.)

5. More expressly state that investigation-related information provided to the Executive Committee to resolve director violations must be provided publicly under the Brown Act.
6. Provide clarifying language on the levels of violations.
7. Identify where mandatory public information on ethics investigations is posted.
8. Consider whether substantiated ethics violations involving directors should be referred to the full Board for consideration of further action instead of the Executive Committee. (If responsibility ends with Executive Committee, amend the Administrative Code language to make it more explicit.)

Provisions Identified for Review and Potential Amendment (Cont.)

9. Make explicit that in addition to reviewing and considering directors' substantiated ethics violations, the Executive Committee (or Board, if desired) also decides on further action, if any.
10. Add Administrative Code language specifying that directors may provide comment during the public meeting in which their ethics violation is considered for further action.

Next Steps

Ethics Office will:

- Consider additional procedures for review based on Committee input, if applicable
- Draft preliminary proposal
- Review with outside counsel
- Return to Committee with preliminary proposal early next year for further discussion
- Finalize preliminary proposal
- Send preliminary proposal to Ethics Chair and Vice Chair, department heads and bargaining units
- Return to Committee for action

THE ETHICS OFFICE

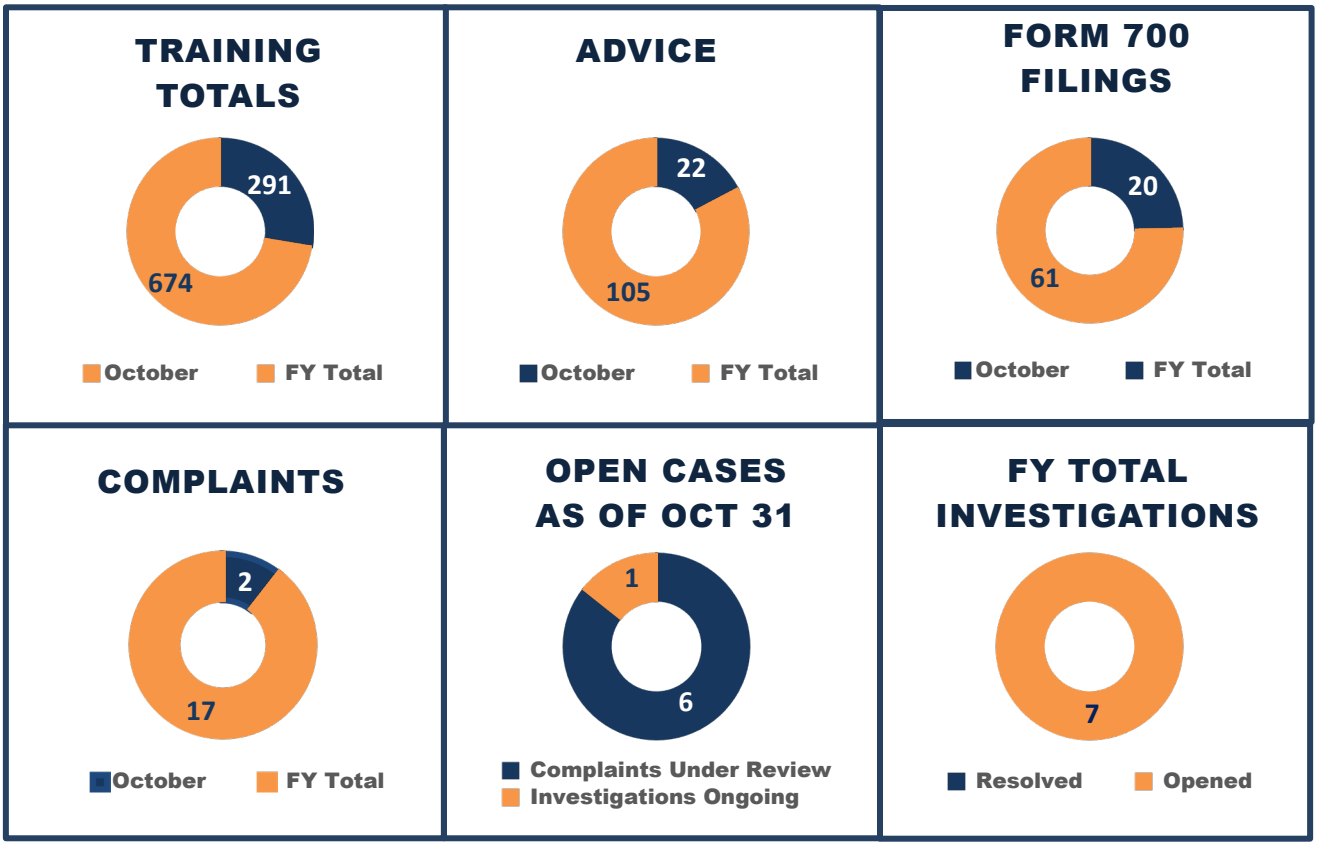
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Questions?

THE METROPOLITAN WATER DISTRICT OF
SOUTHERN CALIFORNIA
1928

OFFICE OF ETHICS

Report for October 2026



EDUCATION Program

Education/Outreach – The Ethics Office issued a memorandum to the workforce about restrictions on political activities. We also issued Ethics in Focus, our quarterly newsletter, which has a guest column by Director Dennis Erdman, Chair of the Engineering, Operations, and Technology Committee. Staff presented an Ethics Office overview at a new employee orientation session hosted by Human Resources.

Ethics Staff Development – Ethics staff attended the Society of Corporate Compliance and Ethics Academy. Sessions included:

- Organizational Ethics
- Conflicts of Interests
- Creating and Reviewing Compliance Policies and Procedures

- Best Practices, Benchmarking and Perspectives
- Program Evaluation and Effectiveness
- Compliance Program Risks and Disclosures

Staff also attended a live webinar provided by the Association of Workplace Investigators titled *Best Practices for Workplace Investigations Involving Third Parties*.

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 51 compliance-related matters for directors and employees relating to Form 700.

Form 700 Compliance – Staff contacted seven employees who were late filing their Assuming Office or Leaving Office Form 700 statement and three former employees about their requirement to file Leaving Office Form 700 statements. Staff will continue efforts to reach full compliance with state Form 700 requirements.

AB 1234 Ethics Training Compliance – Staff assisted 81 employees with AB 1234 ethics training compliance. Assistance included notifications, troubleshooting the online training program, and obtaining training certificates. A total of 47 employees completed their training this month. Four directors and 38 employees have not submitted their ethics training certificate to the Ethics Office. Staff will continue 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:

- How does a manager navigate conflicts of interest and other ethics considerations where the manager's spouse accepts employment with a Metropolitan contractor performing services in the manager's workgroup?
- What ethics considerations apply to a manager who is offered an outside consulting opportunity?
- May a Metropolitan official request that Metropolitan sponsor a non-profit organization's event if the official sits on the organization's board of directors?

Staff also advised on whether an external individual met the definition of lobbyist for purposes of lobbyist registration and reporting requirements; 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; and 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 October alleging the following:

1. A vendor submitted contract bid materials containing inaccurate information to gain an advantage over competitors. [Status: referred to management.]

2. A manager retaliated against an employee for EEO protected activity. [Status: under review. The EEO Office referred the matter to the Ethics Office to avoid any potential perception of a conflict.]

Ethics Officer Findings – The Ethics Officer determined that there was no violation of the ethics rules in two separate investigations that were completed in October. Both cases, which involved multiple involved parties and extensive gathering of evidentiary records, were completed by Ethics Office staff within six months.

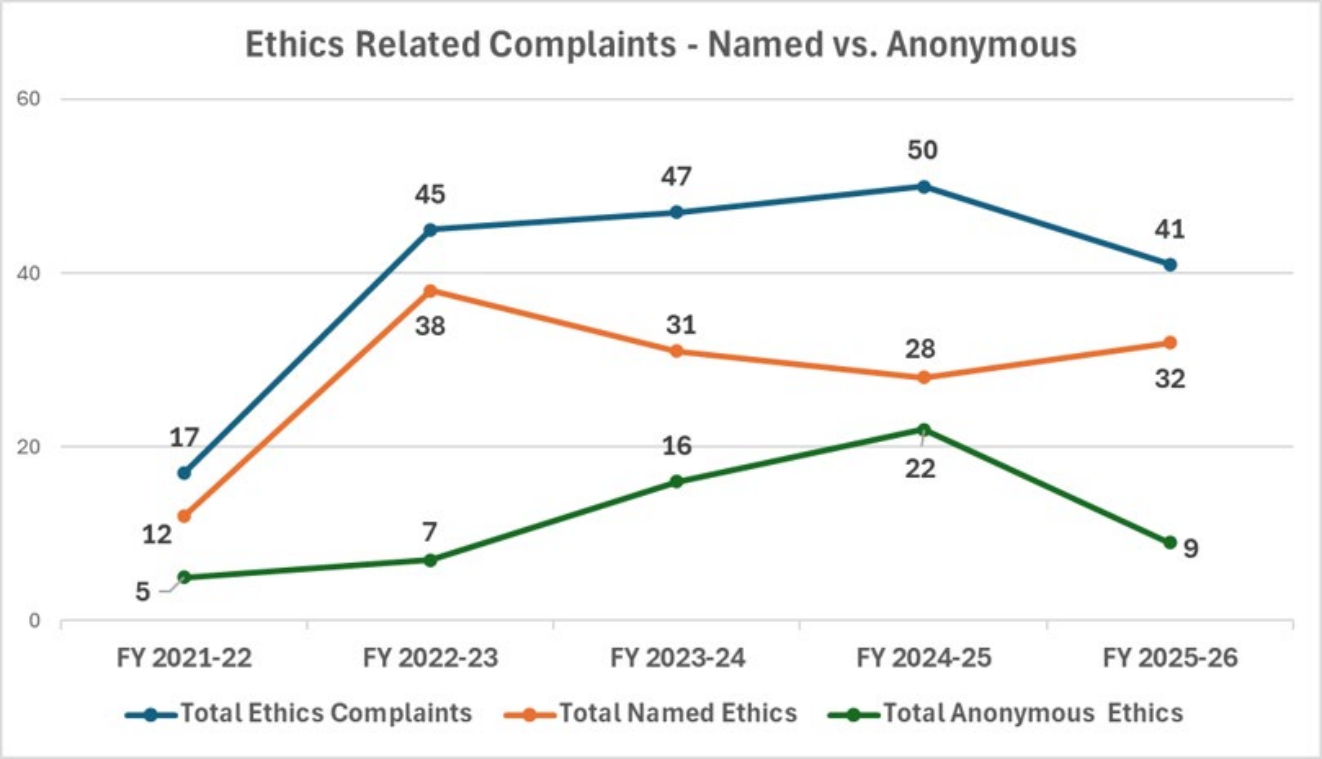
1. A manager allegedly misused their government position or authority to make personal purchases with Metropolitan funds. [Basis: While there was insufficient evidence to substantiate a finding of an ethics rule violation, the matter is being referred to management for further review for potential violations of other workplace policies.]

2. An employee allegedly misused their government position or authority to make personal purchases with Metropolitan funds. [Basis: the evidence did not substantiate the allegations.]

Open Complaints and Investigations – As of October 31, 2026, the Investigation Program was managing a total of six open ethics complaints under preliminary review and one ongoing ethics investigation. The investigation, alleging misuse of authority for personal gain, was opened in March and is expected to be completed within the next 30 days.

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

Comparative Complaint Data – In response to Director discussion at the October Ethics Committee meeting, the Ethics Office compiled comparative data regarding anonymous complaints. Over the past five fiscal years (July 1, 2021 through June 30, 2026), the Ethics Office has received a total of 200 complaints alleging ethics violations. Of those, 141 were from named complainants and 59 were anonymous. Fiscal year data is included in the chart below.



ADMINISTRATIVE

Professional Services Contracts –

The Ethics Office entered into an agreement with Olson Remcho for independent legal advice related to Ethics Office advice, investigations, and other office matters.

The Ethics Office extended annual contracts for professional services on an as-needed basis with the Shaw Law Group and Ellis Investigations Law Corporation for independent investigation services at annual maximums of $240,000 each. The Ethics Office also extended an annual contract with Shaw Law Group for as-needed independent counsel at an annual maximum of $100,000.

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.

Ethics Committee

Ethics Complaint Data: Fiscal Years 2022-2026

Item 8a

November 10, 2026

Presented by: Abel Salinas, Ethics Officer

Item 8a

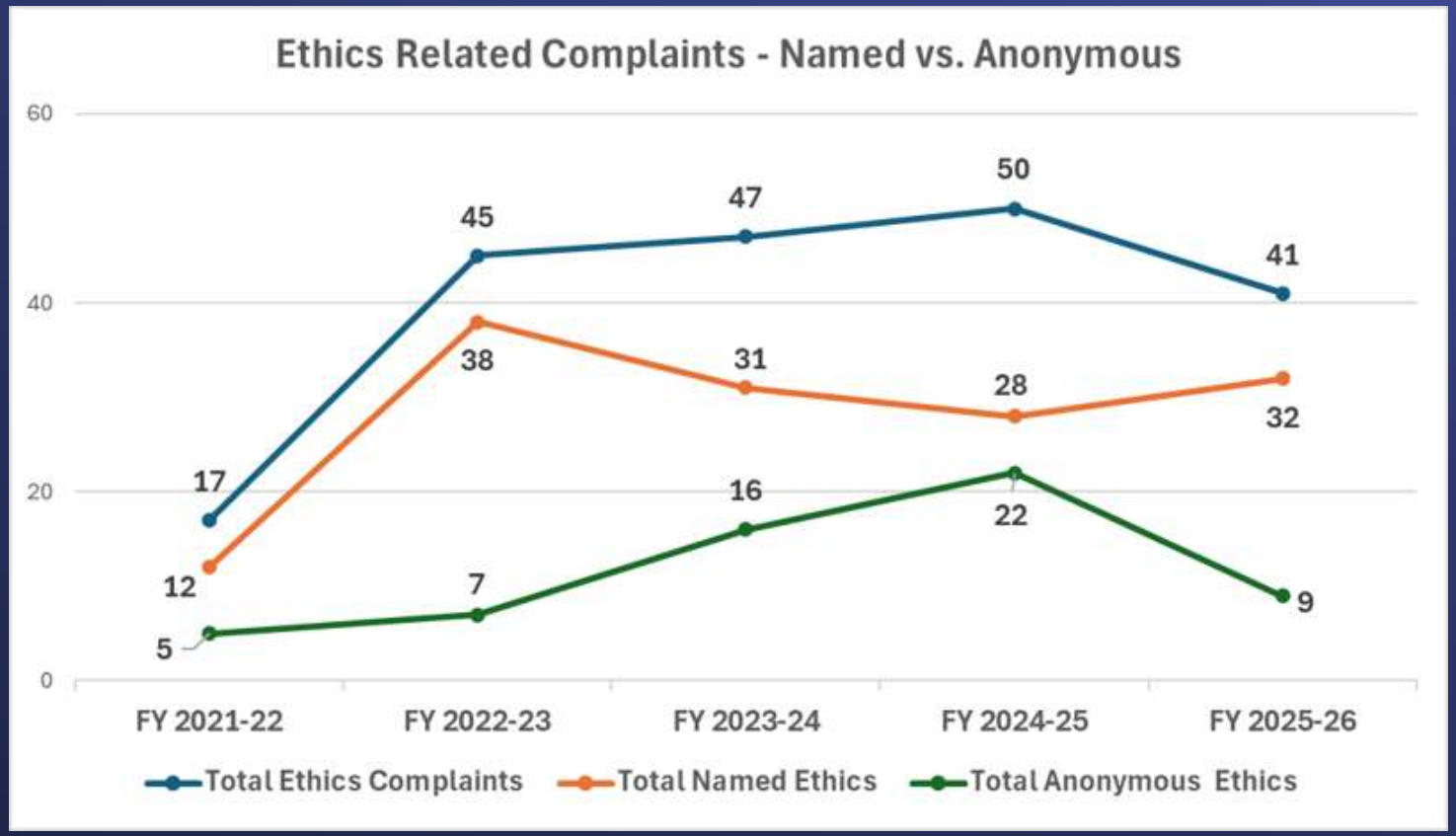
Subject

Ethics Complaint Data: Fiscal Years 2022-2026

Purpose

At a director's request, to provide data on named versus anonymous ethics complaints.

Ethics Complaint Data
Fiscal Years 2022-2026



THE ETHICS OFFICE

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Questions?

THE METROPOLITAN WATER DISTRICT OF
SOUTHERN CALIFORNIA
1928