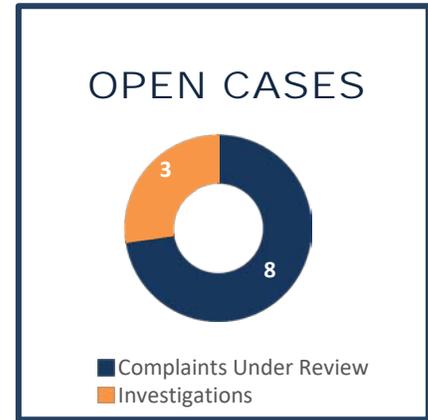
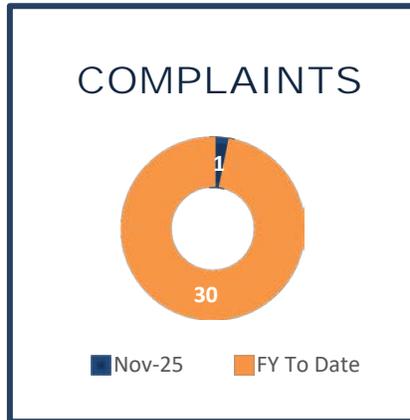




OFFICE OF ETHICS

Ethics Officer's Report for November 2025



EDUCATION Program

Staff presented an Ethics Office overview at two new employee orientations hosted by Human Resources and five in-person *Government Ethics 101* trainings to employees at Weymouth and Gene Camp.

Investigations staff attended the Association of Workplace Investigators Annual Conference. Sessions included: *Your Investigations on Trial: A Litigator's Take on Stronger Investigations*, *Into the Boardroom: What Every Investigator Must Be Ready For*, *The Sound of Silence: Investigating in Fear-Based Workplaces*, and *Bright Lines: Investigating Retaliation* *Complaints Without Making Legal Conclusions*. Staff also attended *Form 700 Filers Webinar* presented by the California Fair Political Practices Commission.

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

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

AB 1234 Ethics Training Compliance – One director has not submitted their ethics training certificate to the Ethics Office. Staff will continue efforts to confirm 100% compliance.

ADVICE Program

Staff addressed 70 time-sensitive advice matters for directors and employees related to conflicts of interest, financial disclosure, gifts, and other ethics-related topics.

Examples of advice requested:

- Whether a contractor's prior work on a project disqualifies the contractor from future work on the same project.
- Whether an employee has a conflict of interest precluding their participation on an RFQ evaluation panel.
- Whether an official's relatively small amount of stock creates a conflict of interest requiring recusal from Metropolitan matters involving the company.
- What are the ethics implications involved in public-private partnerships.
- What are the ethics considerations in considering a concurrent appointment with another government agency.

Staff also helped screen for potential conflicts of interest in Committee and Board items and prepare disclosure scripts for directors required to disclose financial interests and recuse from agenda items. A significant uptick in advice matters this month in part reflects several conflict of interest screenings related to a large scale request for qualifications.

INVESTIGATION Program

Complaints Received – The Ethics Office received one new complaint in November which alleged a misuse of authority connected to business expense reimbursements. This complaint is currently under preliminary review.

Complaints Resolved – Following preliminary reviews, two complaints alleging ethics violations resulted in formal investigations being opened, and a third ethics complaint was closed with no further action due to insufficient evidence. It took an average of 57 calendar days to conduct preliminary reviews of these matters.

Open Complaints and Investigations – As of November 30, 2025, the Investigation Program was managing a total of eight open ethics complaints under 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 November.

ADMINISTRATION

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

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.