



## Monthly Report March 2025

### EDUCATION Program

Ethics Education staff presented an Ethics Office overview at new employee orientations hosted by Human Resources, held an ethics policy overview session at the General Manager's Group Manager meeting, and attended: "Getting the Message: Measuring Impact of Your Training," hosted by the Council on Governmental Ethics Laws.

Education staff also met with External Affairs and Human Resources staff for feedback and subject matter expertise related to education and outreach resources and opportunities at Metropolitan.

### 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. Staff also navigated the recent Annual Form 700 filing deadline extension for certain filers adopted by the Fair Political Practices Commission. In total, staff addressed 78 compliance-related matters for Metropolitan Directors and staff related to Form 700.

**Conflict of Interest Code** – Staff evaluated which new Metropolitan positions must file Form 700 and determined the appropriate level of disclosure for each position. Staff also initiated the state-mandated biennial COI Code review process and began working with a consultant to assist with the Code amendment process.

**AB 1234 compliance** – Staff managed AB 1234 state ethics training compliance for Metropolitan. 84% of Metropolitan officials required to take ethics training have complied with the state requirement. Nine have not completed the training. Staff will continue efforts to seek 100% compliance.

## ADVICE Program

Advice staff addressed 44 time-sensitive advice requests for directors and employees related to the following ethics laws and policies: conflicts of interest, financial disclosure, gifts, outside employment, revolving door restrictions, and other ethics-related topics. Examples of advice requested includes:

- Whether officials must disclose a personal residence on Form 700 where the residence is also used for business purposes and a portion of the property is claimed as a tax deduction.
- Whether the revolving door and conflict of interest provisions prevent a recently retired Metropolitan employee from working for a consultant on a Metropolitan project the employee worked on while employed by Metropolitan.
- Whether a Metropolitan department may hire a former employee for a sole source contract.
- Whether an employee may accept an event ticket from a current Metropolitan contractor.
- Whether an official may accept a consulting opportunity with a Metropolitan partner organization.

Staff also helped identify and advise on potential conflicts of interest in Committee and Board agenda items.

## INVESTIGATION Program

**Complaints** – The Ethics Office received eight new complaints involving the following allegations:

- Retaliation by a manager against an employee for reporting potential workplace violations.
- Unprofessional behavior by an employee.
- Improper outside employment activity by an employee.
- Improper influence over a recruitment by a Metropolitan official.
- Improper acceptance of a gift from a Metropolitan vendor by a manager.
- Improper receipt of gifts, outside employment activity, misuse of authority, and conflict of interest by a Metropolitan manager.
- Two instances of misuse of authority and conflict of interest by two Metropolitan officials.

Open Complaints and Investigations – As of March 31, 2025, the Investigations Program is managing a total of 19 open complaints and one open ethics investigation.

## SNAPSHOT for March 2025

Advice Matters <b>44</b>	Pending Complaints <b>19</b>
Compliance Assistance <b>78</b>	Investigations Opened <b>0</b>
New Complaints Received <b>8</b>	Pending Investigations <b>1</b>

## 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.