



Monthly Report

May 2025

EDUCATION Program

This month, the Ethics Office proposed to the Board that the biennial state ethics training requirement be expanded to include all Metropolitan officials who file Statements of Economic Interest (Form 700). The Board approved the proposal, and ethics staff began coordinating the expanded training requirement.

Staff presented an Ethics Office overview at new employee orientations hosted by Human Resources, provided an overview of the Gift policy to the Community and Workplace Culture Committee, and issued a gift fact sheet to directors. Staff also had in-service refresher training on Metropolitan's AI Guidelines.

Staff attended a panel session hosted by the Council on Governmental Ethics Laws: *Lobbying Roundtable*.

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 22 compliance-related matters for Metropolitan Directors and staff related to Form 700.

Annual Form 700 Compliance – As of May 31, two directors and 50 employees had not

yet filed their Annual Form 700. While typically due April 1, the annual Form 700 filing deadline was extended to June 2, 2025, for qualifying filers due to the January fires in Los Angeles County. Staff will continue efforts to reach 100% compliance.

AB 1234 Compliance – 84% of Metropolitan officials required to take biennial AB 1234 state ethics training are in compliance. Nine officials are not in compliance. Staff will continue efforts to seek 100% compliance. Staff also selected a vendor to track AB 1234 trainings after the training requirement was expanded to all Form 700 filers (approximately 800 employees).

ADVICE Program

Advice staff addressed 34 time-sensitive advice requests for directors and employees related to the following ethics areas: conflicts of interest, financial disclosure, recusals, gifts, and other ethics-related topics.

Examples of advice requested:

- Whether a subcontractor on a project is disqualified from an RFQ related to additional work on the same project where the subcontractor’s prior work included participating in the development of reports that will be part of the RFQ bid documents.
- Whether multiple gifts qualify for the “acts of human compassion” exception.
- Whether a Metropolitan official may accept, if selected, a Metropolitan grant in their private capacity where the official had no role in the grant process in their official capacity.
- Whether an employee may serve as an evaluator on an RFQ review panel where the employee’s former employer is a respondent to the RFQ.

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

INVESTIGATION Program

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

- Report of damaged Metropolitan property. [Referred to Management]
- Two instances of misuse of authority by managers for personal gain. [Under review]
- Improper release of confidential information. [Under review]

- Retaliation by a manager against an employee for reporting potential EEO violations. [Referred to EEO]

Open Complaints and Investigations – As of May 31, 2025, the Investigation Program is managing a total of 11 open complaints and one open ethics investigation.

Resolved Complaints – Seven allegations of potential ethics violations were resolved following six preliminary reviews and one formal investigation. It took an average of 115 days to review and resolve these matters, some of which included multiple complex allegations.

Ethics Officer Findings – The Ethics Officer determined that a supervisor did not accept a gift from a Metropolitan restricted source, and therefore did not violate Administrative Code section 7122.

SNAPSHOT for May 2025

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| Advice Matters 34 | Pending Complaints 11 |
| Compliance Assistance 22 | Investigations Opened 0 |
| New Complaints Received 4 (82 to date, FY 24-25) | Pending Investigations 1 |

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.