

ANNUAL ETHICS CONFERENCE

The Ethics Office attended the 2024 annual COGEL conference in downtown Los Angeles December 8 – 11. The Council on Governmental Ethics Laws (COGEL) is the preeminent organization for governmental ethics professionals. The annual COGEL conference brings together government ethics professionals from around the world to hear from expert panels and share trends and best practices.

Staff attended sessions covering topics including conducting effective ethics trainings, navigating investigation hurdles, succession planning, emerging gift issues, and developing strategies for restoring public trust in government. Plenary speakers included Los Angeles Mayor Karen Bass, California Secretary of State Shirley Weber, and former White House Counsel John Dean.



EDUCATION PROGRAM

Ethics staff presented an Ethics Office overview at new employee orientations hosted by Human Resources and engaged with stakeholders about our office’s proposal to expand the AB 1234 state ethics training requirement to all Form 700 filers.

The office also hired an Ethics Educator who will assume their position in late January, and staff attended the “Skills and Techniques to Unleash the Effective Communicator in You” session at the COGEL conference.

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 transitioning into the new state filing system for certain officials, including directors, troubleshooting the electronic filing system, and notifications of deadlines.

AB 1234 compliance – Managed AB 1234 state ethics training compliance for Metropolitan and Metropolitan officials required to take the biennial training. As of Dec 31, 2024, 48 Metropolitan officials have complied with this state ethics training requirement. 21 officials still need to take the training. Staff will continue efforts to seek 100% compliance from Metropolitan officials. As

part of our continued transparency and compliance efforts, Directors' AB 1234 training certificates will now be available on Metropolitan's website.

Staff development – Compliance staff attended Statement of Economic Interest (Form 700) and Filing Officer trainings provided by the Fair Political Practices Commission and four lobbying panel discussions at the COGEL conference including “Transparency Strategies for Local Lobbying Activity” and “Lobbying Disclosure Frameworks in the U.S. and Canada: Impacts and Challenges for Non-profits, Coalitions, and Membership Organizations.”

ADVICE PROGRAM

Advice staff responded to 11 new advice matters for Metropolitan officials related to the following ethics laws and policies: conflicts of interest, financial disclosure, gifts, outside employment, and other ethics-related topics. Advice requested included:

- Whether a Metropolitan contractor's prior work on a project precluded them from obtaining an additional contract on the same project.
- Whether an official could participate in a Metropolitan matter involving an entity in which they recently held stock.
- How an employee should deal with a contractor's unsolicited gift.

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

POLICY DEVELOPMENT PROGRAM

In response to concerns arising from recent Ethics Office matters, the Ethics Officer proposed various personnel-related policy and process changes to the Interim General Manager, General Counsel, and General Auditor. The group agreed to continue reviewing the proposals and work together on reforms.

Staff attended multiple sessions on ethics policies and trends at the COGEL conference including “Applying Pre, Post and Concurrent Employment Requirements to Today's Workplaces” and “Pay to Play.”

The Policy Program is currently evaluating potential ethics policies including an outside employment disclosure policy for employees and a communications blackout period during procurements/contract selection processes.

INVESTIGATIONS PROGRAM

Referral of Ethics Finding – The Ethics Office referred a conflict of interest determination to the Fair Political Practices Commission pursuant to the Administrative Code.

New Complaints – The Office received six new complaints involving the following allegations:

- Inappropriate conduct based on a protected class by an employee.
- Discrimination and harassment by a manager.
- Discrimination and harassment by Metropolitan officials.

- Prohibited substance use by an employee.
- Unfair hiring based on a protected class.
- Retaliation by a manager for reporting potential misconduct.
- Misuse of authority for personal gain by a manager.

Open Complaints and Investigations – As of December 31, 2024, the Investigations Program is managing a total of 14 open complaints under review and one open ethics investigation.

Staff Development – Staff attended multiple sessions on government investigation trends at the COGEL conference including: “Settlement Showdown: The Views from Both Sides” and “Enforcement Update 2024: Trends, Challenges, and Developments in Investigations and Enforcements.”

DECEMBER SNAPSHOT

Advice Matters	11
Compliance Assistance	17
Complaints Received	6
Pending Complaints	14
Investigations Opened	0
Pending Investigations	1

COMPLAINTS MAY BE FILED AT:

ANONYMOUS ETHICS HOTLINE
 (800) 461-9330
<http://www.mwdethicshotline.net/>

ETHICS OFFICE
 (213) 217-5832
ethicsoffice@mwdh2o.com