



ETHICS OFFICE MONTHLY REPORT

TO BOARD OF DIRECTORS

Metropolitan Water District of Southern California
March 2016

FORM 700 FILINGS

The economic disclosure (Form 700) filing season is winding down. Annual 2015 filings were due April 1, 2016.

New employees and directors who filed assuming office statements on or after October 1, 2015 are not required to file annual statements until 2017. As with last year, filers had a choice of filing electronically or manually.

The Ethics Office assisted with 48 calls and emailed questions related to the logistics of completing and submitting disclosure forms during this filing period. Among the directors, 92% submitted before the deadline, while 96% of designated employees met the April 1st requirement.



PROJECTS & INITIATIVES

The Ethics Officer and staff remain engaged in several projects and initiatives for review, analysis, and evaluation of various aspects of Metropolitan's activities:

- Use of the new electronic matter management and document management software solution.
- Amendments to Metropolitan's conflict of interest code (i.e., designated positions and disclosure categories).
- Monthly director conflict bulletins.
- Joint analysis with General Counsel's Office and External Affairs on gift reporting and limits relative to participant expenses on Metropolitan inspection trips and conflict of interest questions related to the budget and rate setting process.

ADVICE AND ASSISTANCE

The Ethics Office provides advice, counseling, or other assistance to any director, officer, employee, or contractor regarding application or interpretation of Metropolitan's ethics rules or policies. Absent any unusual circumstances, the Office gives its advice in writing.

The Ethics Office can provide advice only prospectively, i.e., about future activities. If it becomes apparent that a request for advice or other assistance concerns events that have already occurred, it might be necessary to review the matter as a potential violation.

In March 2016, the Office provided analysis and advice in the following areas:

- ⇒ Concurrent outside employment.
- ⇒ Political campaign contributions.
- ⇒ Disclosure of stock investment interests.
- ⇒ Rental property income disclosure.
- ⇒ Recusal due to spouse's ownership interest & income.

ETHICS OFFICE STAFF MATTERS

Kelli Shope is a new staff member at the Ethics Office.

Kelli is a graduate of Pepperdine University Law School, where she was a law review editor-in-chief and president of the Pepperdine Administrative Law Society. She was most recently with the Los Angeles City Fire Department where she investigated and advised about allegations of misconduct and EEO violations.

Kelli spent six years with the Los Angeles City Ethics Commission, where she researched and drafted pleadings and reports about government ethics, campaign finance and lobbying restrictions, including drafting formal Commission advice letters.

Please join us in welcoming Kelli to Metropolitan.

ETHICS OFFICE MATTERS MONTHLY REPORT

Matters Addressed FY 2015-16	FY	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	FY
	14/15	2015	2015	2015	2015	2015	2015	2016	2016	2016	2016	2016	2016	15/16
Ethics Complaints														
Abuse of Authority	14	1	2	4			2	1	1					11
Campaign Contributions								1	1	1				3
Conflict of Interest	1													0
Discrimination					1									1
Economic Disclosure														0
Gifts														0
Misleading Associations														0
Nepotism														0
Outside Employment														0
Outside Scope of Ethics Office	21						1							1
Revolving Door														0
Whistleblower Protection	3													0
Total Complaints	39	1	2	4	1	0	3	2	2	1	0	0	0	16
Ethics Advice														
Abuse of Authority	3	2				2								4
Political Activities	2						1	1		4				6
Conflicts of Interest	19	1	2	3	4	3		11	5	3				32
Economic Disclosure	16			2					3	19				24
Gifts	25		1	2			3		4	2				12
Misleading Associations														0
Nepotism														0
Outside Employment	4		1		1					1				3
Outside Scope of Ethics Office	3								2					2
Public Inquiries				1										1
Revolving Door	8	3												3
Whistleblower Protection														0
Total Questions	80	6	4	8	5	5	4	12	14	29	0	0	0	87
Combined Total	119	7	6	12	6	5	7	14	16	30	0	0	0	103