



Los Angeles City Ethics Commission

April 30, 2015

The Honorable City Council
c/o Holly Wolcott, City Clerk
200 North Spring Street
City Hall—3rd Floor
Los Angeles, CA 90012

Re: Los Angeles Administrative Code § 24.51 and Ticket Distributions

FOR COUNCIL CONSIDERATION

Dear Councilmembers:

On April 21, 2015, the Ethics Commission voted unanimously to adopt two resolutions affecting Los Angeles Administrative Code (LAAC) § 24.51. The first rescinds the existing version of the section, and the second adds a new version (as well as new LAAC §§ 24.52–24.55) regarding the distribution of tickets by City agencies, including elected offices and proprietary departments. This letter transmits both resolutions and a recommended amendment to the Governmental Ethics Ordinance (GEO) regarding tickets.

The resolutions and the recommended GEO language are explained in more detail below, and the Ethics Commission urges you to approve them. Copies of the resolutions are provided in Attachments A and B, and the GEO amendment is identified below in section B.7.

The Los Angeles City Charter (Charter) requires the City Council to take prompt action on the resolutions regarding the LAAC. A public hearing must be held and action to approve without modification or disapprove the resolutions must be taken within 60 days of the date the Ethics Commission approved them. Charter § 703(b). Therefore, the deadline for action on the resolutions is June 22, 2015. *See* Charter § 106(a).

A. Rescission of Existing LAAC § 24.51

The existing version of LAAC § 24.51 contains requirements regarding the disclosure of certain expenditures made by City officeholder and legal defense committees. To provide better notice to persons who must comply with these requirements, they were recently incorporated into the Campaign Finance Ordinance (CFO). *See* Los Angeles Municipal Code (LAMC) §§ 49.7.21(C)–(D).

As a result, the existing version of LAAC § 24.51 is now redundant. It is also inaccurate, because the disclosure requirements in the CFO have been updated and clarified. To eliminate the potential for confusion, the Ethics Commission adopted the resolution in Attachment A, which rescinds the existing version of LAAC § 24.51.

B. Adoption of New LAAC §§ 24.51–24.55

A local agency is permitted by state law to adopt a policy regarding tickets that are distributed by City agencies to City personnel and others. 2 Cal. Code Regs. § 18944.1; *see* Attachment C. A ticket distribution and disclosure policy clarifies when tickets issued under the policy are considered gifts to City officials for purposes of state and City law.

In accordance with state law, the resolution in Attachment B adopts a ticket distribution and disclosure policy. It also provides the policy language, housed in a new version of LAAC § 24.51 and newly adopted LAAC §§ 24.52–24.55. The policy is further explained below.

1. Gift Laws

To help preserve public confidence in government decisions and to avoid even the appearance of impropriety, both City and state laws govern gifts to City officials by imposing limits and requiring disclosure. A gift is defined as a payment that confers a personal benefit on a government official when the official does not provide equal or greater consideration. Cal. Gov't Code § 82028(a).

In general, when a City official receives a ticket or pass for attending an event, it is treated as a gift. There are certain exceptions that apply to all gifts, such as when the ticket or pass is received from a member of the government official's family or when the government official returns it, unused, within 30 days of receipt. *See* Cal. Gov't Code §§ 82028(b)(2)–(3). But state law also provides an exception specifically for a ticket or pass that a government official receives from a government agency pursuant to an adopted ticket distribution policy. 2 Cal. Code Regs. § 18944.1.

2. Policy Requirements

There are a number of reasons a government agency might have tickets to an event and want to distribute them. For example, an agency might control the event or venue, it might receive tickets pursuant to a contract, it might purchase tickets, or it might receive complimentary tickets from an outside source.

When the agency both distributes a ticket in accordance with a ticket distribution policy adopted by the agency's legislative or governing body and discloses the distribution, the ticket is not treated as a gift to a government official. 2 Cal. Code Regs. §§ 18944.1(a)(2), 18944.1(b)(1)(C). To be consistent with state law, the adopted policy must contain at least the following:

- a. A provision requiring that ticket distribution to accomplish a specified public purpose;
- b. A prohibition on the transfer of tickets to anyone other than a member of the official's immediate family, or no more than one guest, and for any reason other than that individual's attendance at the event; and

- c. The disclosure of tickets distributed under the policy on the Fair Political Practices Commission's (FPPC) Form 802, which is retained by the agency and filed with the FPPC.

2 Cal. Code Regs. §§ 18944.1(c),(d). A copy of Form 802 is provided in Attachment D.

3. Citywide Policy

Two City agencies have previously adopted ticket distribution policies of their own: the Office of the Mayor and the Los Angeles Harbor Commission. A copy of each of those policies is provided in Attachment E. However, the policies are not consistent with each other, and they do not apply to the vast majority of City agencies or officials. The Ethics Commission believes it is important to treat all City agencies and City officials equally under the law and, therefore, adopted a uniform ticket distribution policy that applies Citywide and supersedes any policies adopted by individual City agencies.

In addition to treating all City agencies and City officials equally, the policy adopted by the Ethics Commission will provide the public with increased disclosure about who distributes and receives tickets. It will also reduce confusion and the likelihood that tickets accepted by an agency for distribution to a third party, like a school or non-profit organization, will be treated as a gift to the City official who accepted them on behalf of the agency. Finally, the policy will treat City officials similarly to officials in over 150 other California jurisdictions that have ticket distribution policies on file with the FPPC. *See* Attachment F.

4. Public Purposes

As noted above in section B.2, a ticket distribution policy must identify the public purposes for which a ticket or pass may be distributed, and all distributions must meet at least one of those purposes. 2 Cal. Code Regs. §§ 18944.1(c)(1)–(2). The policy adopted by the Ethics Commission identifies seven public purposes:

- a. Promoting industry, employment, tourism, or economic development in the City.
- b. Furthering the work, mission, or duties of a City agency.
- c. Promoting cultural, artistic, educational, recreational, or community activities in the City.
- d. Encouraging or recognizing significant academic, athletic, or public achievements.
- e. Attracting or retaining highly qualified City employees, officials, or volunteers.
- f. Recognizing the meritorious service of current or former City employees, officials, or volunteers.

- g. Facilitating a City official's familiarity with or ability to carry out City duties related to the management, administration, or care of a City facility or event.

See LAAC § 24.53(b)(1). These public purposes allow for the reasonable use of tickets and passes held by an agency and are similar to public purposes listed in ticket distribution policies of other California government agencies. See, e.g., Attachment G, "Ticket Policy", Los Angeles County, 6/30/09.

5. Disclosure

When an agency distributes tickets pursuant to a ticket distribution policy, state law requires the agency to disclose information about the distribution by submitting the FPPC's Form 802. 2 Cal. Code Regs. § 18944.1(d). The form must identify the following information:

- a. The names of the persons, including entities, who received tickets;
- b. The date and a description of the event;
- c. The face value of the ticket;
- d. The number of tickets received by each person;
- e. The name of any City official who behested the tickets; and
- f. A description of the public purpose for which the tickets were distributed.

2 Cal. Code Regs. § 18944.1(d)(1). Form 802 must be maintained as a public record, and a copy must be forwarded to the FPPC for posting on its website. *Id.*

The policy adopted by the Ethics Commission requires each Ticket Administrator to maintain the original Form 802 and to file copies with both the FPPC and the Ethics Commission. See LAAC § 24.54. To ensure timely disclosure, the policy requires original filings to be made within 30 days of the ticket distribution and for amendments to be filed within 10 days after the occurrence that necessitates the amendment. See LAAC §§ 24.54(b)–(c).

6. General Provisions

The adopted policy identifies a Ticket Administrator for each City agency, who is responsible for distributing tickets and passes and for filing Form 802. See LAAC §§ 24.52(e), 24.53(b)(2)–(3), 24.54. Because different City agencies have different needs, each agency's Ticket Administrator may adopt internal procedures to facilitate the distribution of tickets, as long as the procedures are consistent with the policy. See LAAC § 24.55(b).

The policy specifies that, in addition to using one ticket personally, a City official may transfer one ticket to each member of the official's immediate family or to no more than one guest. See LAAC § 24.55(a). However, transfers are permitted only so that the transferee may attend the event. *Id.* A City official may not sell or receive consideration for the value of a ticket received under the policy. *Id.*

To mirror restrictions on gifts in the GEO, the policy prohibits a City official from soliciting or accepting a ticket or pass in exchange for performing an official City act and from soliciting a ticket or pass from a person who is a restricted source to that official. *See* LAAC § 24.55(d). It notes that if a City official receives a benefit beyond what is provided to all members of the public with the same class of ticket, that benefit may be subject to gift limits and carry disclosure requirements for the official. *See* LAAC § 24.55(c). It also states that receiving a ticket or pass is a privilege, not a right, and that violations are subject to enforcement by the Ethics Commission. *See* LAAC §§ 24.55(f)–(g).

7. GEO Provision

While the policy, itself, will reside in the LAAC, the Ethics Commission also approved adding a new provision to the gift section of the GEO. To inform the public and those who are subject to state and City gift laws of the new LAAC sections, the Ethics Commission recommends adding a new LAMC § 49.5.8(D), to read as follows:

“D. A ticket or pass distributed by an agency to a City official in accordance with Chapter 5 of Administrative Code Division 24 is not a gift to the City official.”

C. Conclusion

To provide robust public disclosure and proper notice to persons subject to the laws within its jurisdiction, the Ethics Commission urges you to approve the resolutions in Attachments A and B and to adopt the new LAMC § 49.5.8(D) that is identified above in section B.7. The Charter requires City Council action to approve without modification or disapprove the resolutions by June 22, 2015.

If you have questions, please feel free to contact me or Policy Director Mike Altschule at (213) 978-1960. We would be happy to talk with you any time.

Sincerely,



Heather Holt
Executive Director

Attachments:

- A *Resolution Rescinding Existing LAAC § 24.51*
- B *Resolution Adopting New LAAC §§ 24.51–24.55*
- C *2 Cal. Code Regs. § 18944.1*
- D *Form 802*
- E *Ticket Distribution Policies for the Mayor’s Office and Harbor*
- F *California Jurisdictions with Ticket Distributions Policies as of April 30, 2015*
- G *Ticket Policy for Los Angeles County*



Los Angeles City Ethics Commission

RESOLUTION

WHEREAS Los Angeles City Charter section 703(a) grants the Ethics Commission authority to adopt, amend, and rescind rules and regulations, subject to Council approval without modification, to carry out the purposes of and provisions of City laws related to campaign finance, conflicts of interests, lobbying, and governmental ethics; and

WHEREAS Los Angeles Administrative Code section 24.51 took effect in January 1995 and contains provisions regulating the disclosure of certain expenditures by City officeholder and legal defense committees; and

WHEREAS amendments to Los Angeles Municipal Code section 49.7.21, which took effect in March 2015, include updated provisions regulating the disclosure of expenditures by City officeholder and legal defense committees and have rendered Los Angeles Administrative Code section 24.51 outdated and redundant;

THEREFORE BE IT RESOLVED by the Los Angeles City Ethics Commission that the 1995 version of Los Angeles Administrative Code section 24.51 is rescinded, subject to Council approval.

I certify that this resolution was adopted by the Los Angeles City Ethics Commission on April 21, 2015, pursuant to Los Angeles City Charter section 703.

Nathan Hochman, President

Jessica Montanez, Board Secretary



Los Angeles City Ethics Commission

RESOLUTION

WHEREAS Los Angeles City Charter section 703(a) grants the Ethics Commission authority to adopt, amend, and rescind rules and regulations, subject to Council approval without modification, to carry out the purposes of and provisions of City laws related to campaign finance, conflicts of interests, lobbying, and governmental ethics; and

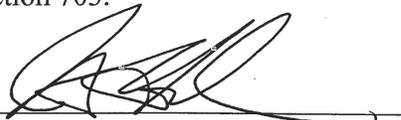
WHEREAS a local agency is permitted under 2 California Code of Regulations section 18944.1 to adopt a policy governing the agency's distribution and disclosure of tickets and passes; and

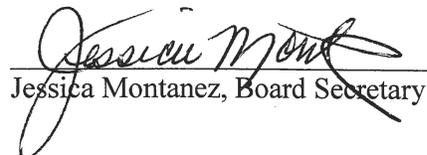
WHEREAS adopting a Citywide policy would clarify when tickets and passes distributed by City agencies to City officials are considered gifts to the officials for the purposes of state and City law; and

WHEREAS the policy attached to this resolution provides the public with increased disclosure, treats all City agencies and City officials equally, and treats City officials similarly to officials in over 150 other California jurisdictions that have adopted similar policies;

THEREFORE BE IT RESOLVED by the Los Angeles City Ethics Commission that the policy attached to this resolution is adopted as Los Angeles Administrative Code sections 24.51 (replacing the 1995 version of section 24.51) through 24.55, subject to Council approval.

I certify that this resolution was adopted by the Los Angeles City Ethics Commission on April 21, 2015, pursuant to Los Angeles City Charter section 703.


Nathan Hochman, President


Jessica Montanez, Board Secretary

Tickets Distributed by Agencies

Los Angeles Administrative Code Division 24, Chapter 5 Ticket Distribution Policy

SEC. 24.51 Authority

This chapter is adopted pursuant to section 18944.1 of Title 2 of the California Code of Regulations as the written ticket distribution policy for every agency. This chapter governs the distribution of tickets and passes by all agencies and supersedes any ticket distribution policy or procedures adopted by any agency.

SEC. 24.52 Definitions

The following terms have the meanings identified below. Other terms used in this Chapter have the meanings identified in the California Political Reform Act of 1974 and the related regulations of the California Fair Political Practices Commission.

- a. "Agency" has the meaning in Municipal Code Section 49.5.2(A). For purposes of this Chapter, each City Council district is a separate agency.
- b. "City official" has the meaning in Municipal Code Section 49.5.2(C).
- c. "Pass" means a ticket that provides repeated access, entry, or admission to a facility or series of events and for which similar passes are sold or provided to the public.
- d. "Restricted source" has the meaning in Municipal Code Section 49.5.2(J).
- e. "Ticket" means anything that provides access, entry, or admission to a specific facility or a specific future event, show, or performance for an entertainment, amusement, recreational, or similar purpose if similar tickets are sold or provided to the public to view, listen to, or otherwise take advantage of the attraction or activity. A ticket includes any benefits that the ticket provides. A ticket may be acquired pursuant to the terms of a contract, obtained because the City controls the event, purchased by the City, received from an agency, or received from an outside source.
- f. "Ticket Administrator" means an agency's general manager or chief administrative officer, or that person's designee. For elected offices, the chief administrative officer is the elected City official.

SEC. 24.53
Application

A ticket or pass is not a gift to a City official, including an individual who accepts the ticket or pass on behalf of an agency, in either of the following scenarios:

- a. The ticket or pass is income, consistent with federal and state income tax laws, and the agency reports the ticket or pass as income to the official in accordance with Section 24.54; or
- b. All of the following apply:
 1. The distribution of the ticket or pass accomplishes one or more of the following public purposes:
 - i. Promoting industry, employment, tourism, or economic development in the City.
 - ii. Furthering the agency's work, mission, or duties.
 - iii. Promoting cultural, artistic, educational, recreational, or community activities in the City.
 - iv. Encouraging or recognizing significant academic, athletic, or public achievements.
 - v. Attracting or retaining highly qualified City employees, officials, or volunteers.
 - vi. Recognizing the meritorious service of current or former City employees, officials, or volunteers.
 - vii. Facilitating a City official's familiarity with or ability to carry out City duties related to the management, administration, or care of a City facility or event.
 2. The Ticket Administrator distributes the ticket or pass to the City official for the official's use, for use by a member of the official's immediate family, or for use by no more than one guest.
 3. The Ticket Administrator, in his or her sole discretion, determines who will receive the ticket or pass.
 4. An outside source has not earmarked the ticket or pass for a specific City official.
 5. The distribution of the ticket or pass is disclosed in accordance with Section 24.54.

SEC. 24.54
Disclosure

The Ticket Administrator shall disclose the distribution in accordance with Section 18944.1(d) of Title 2 of the California Code of Regulations, on a form provided by the Fair Political Practices Commission.

- a. The Ticket Administrator shall maintain the original form as a public record.
- b. The Ticket Administrator shall file copies of the form with the Ethics Commission and the state's Fair Political Practices Commission within 30 days after the ticket or pass is distributed.
- c. The Ticket Administrator shall file amendments to the form within 10 days after the issue that necessitates the amendment occurs.

SEC. 24.55
General Provisions

- a. In addition to personally using one ticket or pass, a City official may transfer one ticket or pass to each member of the City official's immediate family or to one guest, solely for that individual's attendance at the event. A City official shall not sell or receive consideration for the value of a ticket or pass.
- b. The Ticket Administrator may create ticket distribution procedures that are consistent with this Chapter.
- c. A benefit that a City official receives from a ticket or pass may be a gift to the official if the benefit is not provided to all members of the public with the same class of ticket or pass.
- d. A City official may not solicit or accept a ticket or pass in exchange for performing an official City act. A City official may not solicit a ticket or pass from a restricted source to that official. If an elected City official behests a ticket or pass, additional reporting may be required.
- e. An agency may distribute an unlimited number of tickets or passes to non-City entities and to individuals who are not City officials, including City employees and volunteers. All tickets and passes that an agency distributes must comply with this Chapter and be disclosed under Section 24.54.
- f. The receipt or use of a ticket or pass under this Chapter is a privilege extended by the City and is not the right of any person to whom the privilege is extended.
- g. A violation of this Chapter is subject to the penalties and remedies in Charter Section 706 and Municipal Code Sections 49.5.16 and 49.5.17.

(Regulations of the Fair Political Practices Commission, Title 2, Division 6, California Code of Regulations)

§ 18944.1. Gifts: Agency Provided Tickets or Passes.

For purposes of this regulation the terms “ticket” and “pass,” as defined in Regulation 18946, apply solely to an admission to a facility, event, show, or performance for an entertainment, amusement, recreational, or similar purpose provided by an agency to, or at the behest of, an official of that agency, other than an admission provided to a school, college or university district official, coach, athletic director, or employee to attend an amateur event performed by students of that school, college, or university district or an admission identified in Regulation 18942(a)(12).

(a)(1) A ticket or pass is not subject to the provisions of this regulation, if the official treats the ticket or pass as income consistent with applicable state and federal income tax laws and the agency reports the distribution of the ticket or pass as income to the official in compliance with the reporting provisions of subdivision (d) below.

(2) Any ticket or pass acquired by the agency under subdivision (b)(2) and distributed to an official, other than an elected official or member of the legislative or governing body of the agency, for the official's personal use, to support general employee morale, retention, or to reward public service is deemed to serve a public purpose, and any tickets distributed to an official for such purpose shall be reported as described under subdivision (d)(3). For purposes of this paragraph, “personal use” means use by the official, his or her family, or no more than one guest.

(b) The official will meet the burden under Section 82028 that equal or greater value has been provided in exchange for the ticket or pass if the official reimburses the agency for the ticket or if all of the following requirements are met:

(1) For a ticket or pass the agency receives from an outside source, other than as provided in subdivision (b)(2):

(A) The ticket or pass is not earmarked by the outside source for use by the agency official who uses the ticket or pass;

(B) The agency determines, in its sole discretion, who uses the ticket or pass.

(C) The distribution of the ticket or pass by the agency is made in accordance with a policy adopted by the agency that incorporates all of the provisions of subdivision (c) below.

(2) For a ticket or pass the agency obtains (i) pursuant to the terms of a contract for use of public property, (ii) because the agency controls the event (such as a state or county fair), or (iii) by purchase at fair market value, the distribution of the ticket or pass is made in accordance with a policy adopted by the agency that incorporates all of the provisions of subdivision (c) below.

(c) Agency Ticket/Pass Distribution Policy. Any distribution of a ticket or pass under this regulation to, or at the behest of, an agency official must be made pursuant to a written agency ticket distribution policy, duly adopted by the legislative or governing body of the agency or, if none, the agency head that contains, at a minimum, all of the following:

(1) A provision setting forth the public purposes of the agency for which tickets or passes may be distributed.

(2) A provision requiring that the distribution of any ticket or pass to, or at the behest of, an agency official accomplish a stated public purpose of the agency.

(3) A provision prohibiting the transfer of any ticket received by an agency official pursuant to the distribution policy except to members of the official's immediate family or no more than one guest solely for their attendance at the event.

(d) Public Posting. A record of a ticket or pass distributed pursuant to this regulation, must be completed, on a form provided by the Commission. The form must be maintained as a public record, be subject to inspection and copying under Section 81008(a), and be forwarded to the Commission for posting on its website.

(1) Except as provided in paragraphs (2) and (3) below, the information must include the following:

- (A) The name of the person receiving the ticket or pass;
- (B) A description of the event;
- (C) The date of the event;
- (D) The face value of the ticket or pass;
- (E) The number of tickets or passes provided to each person;
- (F) If the ticket or pass is behested, the name of the official who behested the ticket; and
- (G) A description of the public purpose under which the distribution was made or, alternatively, that the ticket or pass was distributed as income to the official.

(2) If the ticket or pass is distributed to an organization outside the agency, the agency shall post the name, address, description of the organization, and the number of tickets or passes provided to the organization in lieu of posting the names of each individual from the organization as otherwise required in paragraph (1) above;

(3) If the ticket or pass is distributed pursuant to subdivision (b) the agency may post the name of the department or other unit of the agency and the number of tickets or passes provided

to the department or other unit in lieu of posting the name of the individual employee as otherwise required in paragraph (1) above;

(e) The Commission recognizes the discretion of the legislative or governing body of an agency or, if none, the agency head to determine whether the distribution of a ticket or pass serves a legitimate public purpose of the agency, provided the determination is consistent with state law.

(f) The provisions of this regulation apply only to the benefits the official receives that are provided to all members of the public with the same class of ticket.

Note: Authority cited: Section 83112, Government Code. Reference: Section 82028, Government Code.

HISTORY

1. Renumbering of former section 18726.7 to section 18944.1 with amendment of section heading filed 6-22-94; operative 6-22-94 (Register 94, No. 25).
2. Change without regulatory effect relocating section filed 11-17-94 pursuant to section 100, title 1, California Code of Regulations (Register 94, No. 46).
3. Amendment of first paragraph and subsections (a)-(b) and (d)-(e) filed 7-25-95; operative 7-25-95 pursuant to Government Code section 11343.4(d) (Register 95, No. 30).
4. Repealer and new section filed 1-8-2009; operative 2-7-2009. Submitted to OAL for filing pursuant to *Fair Political Practices Commission v. Office of Administrative Law*, 3 Civil C010924, California Court of Appeal, Third Appellate District, nonpublished decision, April 27, 1992 (FPPC regulations only subject to 1974 Administrative Procedure Act rulemaking requirements) (Register 2009, No. 2).

5. Repealer of subsection (a), subsection relettering and amendment of newly designated subsections (a)(1), (a)(2)(A)(iii)-(b), (c) and (e) filed 9-27-2010; operative 10-27-2010.

Submitted to OAL for filing pursuant to *Fair Political Practices Commission v. Office of Administrative Law*, 3 Civil C010924, California Court of Appeal, Third Appellate District, nonpublished decision, April 27, 1992 (FPPC regulations only subject to 1974 Administrative Procedure Act rulemaking requirements) (Register 2010, No. 40).

6. Amendment of section heading and section filed 1-23-2012. Pursuant to California Code of Regulations, title 2, section 18313(e), FPPC has designated an effective date of 1-1-2012.

Submitted to OAL for filing pursuant to *Fair Political Practices Commission v. Office of Administrative Law*, 3 Civil C010924, California Court of Appeal, Third Appellate District, nonpublished decision, April 27, 1992 (FPPC regulations only subject to 1974 Administrative Procedure Act rulemaking requirements and not subject to procedural or substantive review by OAL) (Register 2012, No. 4).

**Agency Report of:
Ceremonial Role Events and Ticket/Pass Distributions**

A Public Document

1. Agency Name		Date Stamp	California Form 802
Division, Department, or Region <i>(If Applicable)</i>		For Official Use Only	
Designated Agency Contact <i>(Name, Title)</i>		<input type="checkbox"/> Amendment <i>(Must provide explanation in Part 3.)</i> Date of Original Filing: _____ <i>(Month, Day, Year)</i>	
Area Code/Phone Number	E-mail		

2. Function or Event Information

Does the agency have a ticket policy? Yes No Face Value of Each Ticket/Pass \$ _____

Event Description _____ Date(s) _____/_____/_____

Provide Title/Explanation

Ticket(s)/Pass(es) provided by agency? Yes No If no: _____

Name of Source

Was ticket distribution made at the behest of agency official? No Yes If yes: _____

Official's Name (Last, First)

3. Recipients

• Use Section A to identify the agency's department or unit. • Use Section B to identify an individual. • Use Section C to identify an outside organization.

A. Name of Agency, Department or Unit	Number of Ticket(s)/Pass(es)	Describe the public purpose made pursuant to the agency's policy
B. Name of Individual <i>(Last, First)</i>	Number of Ticket(s)/Pass(es)	Identify one of the following:
		Ceremonial Role <input type="checkbox"/> Other <input type="checkbox"/> Income <input type="checkbox"/> <i>If checking "Ceremonial Role" or "Other" describe below:</i>
		Ceremonial Role <input type="checkbox"/> Other <input type="checkbox"/> Income <input type="checkbox"/> <i>If checking "Ceremonial Role" or "Other" describe below:</i>
C. Name of Outside Organization <i>(include address and description)</i>	Number of Ticket(s)/Pass(es)	Describe the public purpose made pursuant to the agency's policy

4. Verification

I have read and understand FPPC Regulations 18944.1 and 18942. I have verified that the distribution set forth above, is in accordance with the requirements.

Signature of Agency Head or Designee *Print Name* *Title* *(Month, Day, Year)*

Comment: _____

FPPC Form 802 (4/12)
FPPC Toll-Free Helpline: 866/ASK-FPPC (866/275-7772)

Agency Report of: Ceremonial Role Events and Ticket/Pass Distributions

California **802**
Form

A Public Document

This form is for use by all state and local government agencies. The form identifies persons that receive admission tickets and passes and describes the public purpose for the distribution. This form was prepared by the Fair Political Practices Commission (FPPC) and is available at www.fppc.ca.gov.

General Information

FPPC Regulation 18944.1 sets out the circumstances under which an agency's distribution of tickets to entertainment events, sporting events, and like occasions would not result in a gift to individuals that attend the function. In general, the agency must adopt a policy which identifies the public purpose served in distributing the admissions. The Form 802 serves to detail each event and the public purpose of each ticket distribution. FPPC Regulation 18942 lists exceptions to reportable gifts, including ceremonial events, when listed on this form.

When the regulation procedures are followed, persons, organizations, or agencies who receive admissions are listed on a Form 802. Agency officials do not report the admissions on the official's Statement of Economic Interests, Form 700, and the value of the admission is not subject to the gift limit.

The Form 802 also informs the public as to whether the admissions were made at the behest of an agency official and whether the behested tickets were provided to an organization or to specific individuals.

Exception

This form is not required for admission provided to a school or university district official, coach, athletic director, or employee to attend an amateur event performed by students of that school or university.

Public Posting

This form must be maintained as a public document. A copy of all forms must be forwarded to the FPPC for posting on its website. E-mail delivery is preferred. E-mail: Form802@fppc.ca.gov; Fax: 916.322.0886; 428 J Street, Suite 620, Sacramento, CA 95814.

Forms must be sent to the FPPC as soon as possible. General business practice is no later than 45 days from the distribution.

A local agency may also post the forms on its website, but it is not required to do so.

Privacy Information Notice

Information requested by the FPPC is used to administer and enforce the Political Reform Act. Failure to provide

information may be a violation subject to administrative, criminal, or civil penalties. All reports are public records available for inspection and reproduction. Direct questions to FPPC's General Counsel.

Instructions

Part 1. Agency Identification:

List the agency's name. Provide a designated agency contact person, their phone number, and e-mail address. Mark the amendment box if changing any information on a previously filed form and include the date of the original filing.

Part 2. Function or Event Information:

Confirm that your agency has a policy for ticket distribution. Unless the ceremonial role or income box in Part 3, Section B, is marked, this form is only applicable if your agency has a policy.

Complete all of the other required fields that identify the ticket value, description of event, date(s) and whether the ticket was provided by the agency or an outside source. If an agency official behests the tickets, the official's name is also required. Use the comment field or an attachment to explain in full.

Part 3. Ticket Recipients:

This part identifies who uses the tickets. The identification requirements vary depending upon who received the tickets and are categorized into three sections. Each section must list the number of tickets received. Use the comment field or an attachment to explain in full.

Section A. Report tickets distributed to agency staff, other than an elected official or governing board member, pursuant to the agency's policy. It is not necessary to list each employee's name, but identify the unit/department for which the employee works. The agency must describe the public purpose associated with the ticket distribution. A reference to the policy is permissible.

Section B. Report: 1) any agency official who performs a ceremonial role; 2) any agency official who reports the value as income; or 3) tickets used by elected officials and governing board members (including those distributed pursuant to the agency's policy).

Section C. Report tickets provided to an organization. The organization's name, an address (website url is permissible), and a brief description of the public purpose are required.

FPPC Form 802 (4/12)
FPPC Toll-Free Helpline: 866/ASK-FPPC (866/275-3772)

**Agency Report of:
Ceremonial Role Events and Ticket/Pass Distributions
Continuation Sheet**

Agency Name _____

3. Recipients

• Use Section A to identify the agency's department or unit. • Use Section B to identify an individual. • Use Section C to identify an outside organization.

A. Name of Agency, Department or Unit	Number of Ticket(s)/ Pass(es)	Describe the public purpose made pursuant to the agency's policy
B. Name of Individual <small>(Last, First)</small>	Number of Ticket(s)/ Pass(es)	Identify one of the following:
		Ceremonial Role <input type="checkbox"/> Other <input type="checkbox"/> Income <input type="checkbox"/> <i>If checking "Ceremonial Role" or "Other" describe below:</i>
		Ceremonial Role <input type="checkbox"/> Other <input type="checkbox"/> Income <input type="checkbox"/> <i>If checking "Ceremonial Role" or "Other" describe below:</i>
		Ceremonial Role <input type="checkbox"/> Other <input type="checkbox"/> Income <input type="checkbox"/> <i>If checking "Ceremonial Role" or "Other" describe below:</i>
		Ceremonial Role <input type="checkbox"/> Other <input type="checkbox"/> Income <input type="checkbox"/> <i>If checking "Ceremonial Role" or "Other" describe below:</i>
C. Name of Outside Organization <small>(include address and description)</small>	Number of Ticket(s)/ Pass(es)	Describe the public purpose made pursuant to the agency's policy

**LOS ANGELES OFFICE OF THE MAYOR
POLICY REGARDING DISTRIBUTION OF TICKETS AND PASSES**

The Office of the Mayor of Los Angeles ("Office") sets forth the following Policy on Tickets or Passes to Events pursuant to Fair Political Practices Commission Regulation in California Code of Regulations (CCR) Title 2, § 18944.1, subdivision (c).

Section 1 – Application. This Policy shall apply to tickets or passes for admission to a facility, event, show or performance for an entertainment, amusement, recreational, or similar purpose ("Event Tickets"), which are provided to the Office (i) pursuant to the terms of a contract for use of public property, (ii) because the City of Los Angeles sponsors and/or controls the event, (iii) that is purchased by the office at fair market value; or (iv) otherwise received from an outside source and which are provided without charge by the Office to Office/City staff, City Commissioners or City supported community partners and programs ("Recipient"). Tickets or passes purchased at full face value or fair market value of the ticket, as appropriate, by the official using the tickets are not covered by this policy.

Section 2 – Administration. Administration of this Policy, including determination of the public purpose for distribution of Event Tickets hereunder, shall be the responsibility of the Legal Counsel to the Mayor.

Section 3 – Public Purposes. The distribution of any Event Tickets by the Office to, or at the behest of, a Recipient shall promote one of the following public purposes:

- a) economic development or employment within the City of Los Angeles;
- b) events intended to promote or provide exposure to and awareness of business, tourism, recreational, cultural and educational facilities or attractions on City of Los Angeles properties or awareness of the City of Los Angeles as a regional destination, economic asset or business opportunity;
- c) community programs promoted by the Office, including programs supported by charitable and non-profit organizations;
- d) any purpose similar to the above.

All Event Tickets distributed pursuant to this Policy are required to further the accomplishment of these public purposes of the Office.

Section 4 – Distribution of Tickets or Passes. Distribution of Event Tickets by the Office to a Recipient shall be carried out by the Legal Counsel to the Mayor, in accordance to the following requirements:

- a) The Recipient and the Office treat the Event Ticket(s) as income consistent with applicable federal and state income tax laws; or
- b) Event Tickets are distributed in accordance with the public purposes stated in Section 3 above, and provided that:
 1. Such Event Tickets shall not be earmarked by the original source for use by the particular Recipient who uses such Event Tickets;
 2. The Office determines, in its sole discretion, which individual may use the Event Ticket;
 3. Recipients receiving Event Tickets pursuant to this Policy shall not transfer such Event Tickets to any other person, except to the recipient's spouse, domestic partner recognized by state law, dependent children, or one guest;
 4. No person receiving Event Tickets pursuant to this Policy shall sell or receive reimbursement for the value of any ticket.

Section 5 – Posting of Distribution of Tickets or Passes. Distribution of Event Tickets pursuant to this Policy shall be reported on state Form 802 in accordance with CCR Title 2 Section 18944.1 (d). Such reporting shall include:

- a) The name of the person receiving tickets or passes, except that if the tickets or passes are distributed to an organization outside the Office, the name, address and description of the organization may be posted in lieu of the names of individuals from the organization;
- b) a description of the event;
- c) the date of the event;
- d) the face value of the tickets or passes provided;
- e) if the tickets or passes are behested, the name of the person who behested the tickets or passes; and
- f) a description of the public purpose pursuant to this Policy under which distribution was made or, alternatively, that the tickets or passes were distributed as income to the recipient.

**LOS ANGELES HARBOR DEPARTMENT
POLICY REGARDING DISTRIBUTION OF TICKETS AND PASSES**

The City of Los Angeles Harbor Department (Harbor Department) sets forth the following Policy on Tickets or Passes to Events pursuant to Fair Political Practices Commission Regulation in California Code of Regulations (CCR) Title 2, §18944.1, subdivision (c), which requires that any distribution of gifted tickets or passes by a government agency to, or at the behest of, its employees and officials must be made pursuant to a duly adopted written policy. The Port shall post this Policy on its website in prominent fashion.

Section 1 - Application. This Policy shall apply to tickets or passes for admission to a facility, event, show or performance for an entertainment, amusement, recreational, or similar purpose ("Event Tickets"), which are provided to the Harbor Department (i) pursuant to the terms of a contract for use of public property, (ii) because the Harbor Department controls the event, (iii) that is purchased by the Harbor Department at fair market value; or (iv) otherwise received from an outside source and which are provided without charge by the Los Angeles Harbor Department to members of the Los Angeles Board of Harbor Commissioners, Harbor Department or City staff ("Port Recipient"). Tickets or passes purchased at full face value or fair market value of the ticket, as appropriate, by the official using the tickets are not covered by this policy.

Section 2 - Administration. Administration of this Policy, including determination of the public purpose for distribution of Event Tickets hereunder, shall be the responsibility of the Executive Director of the Harbor Department.

Section 3 - Public Purposes. The Harbor Department is a self-supporting proprietary department of the City of Los Angeles, operating independently using its own revenues, and administering and controlling its fiscal activities under the Los Angeles City Charter. The Harbor Department holds its lands and assets in trust for the people of the State of California for purposes that include maritime commerce, navigation, fisheries, public recreation or other water-oriented activities. The distribution of any Event Tickets by the Harbor Department to, or at the behest of, a Port Recipient shall promote one of the following public purposes:

- (a) maritime commerce, navigation, fisheries, public recreation or other water-oriented activities within the Harbor Department's jurisdiction;
- (b) economic development or employment within the Port's jurisdiction, including Harbor Department officials hosting customers at events in which Port-related business may be discussed and furthered;
- (c) events intended to promote or provide exposure to and awareness of maritime business, tourism, recreational, cultural and educational facilities or attractions on Harbor Department properties or awareness of the Port of Los Angeles as a regional destination, economic asset or business opportunity;
- (d) community programs within the Harbor Department's jurisdiction, including programs supported by charitable and non-profit organizations;
- (e) any purpose similar to the above included in any Port contract.

All Event Tickets distributed pursuant to this Policy are required to further the accomplishment of these public purposes of the Harbor Department.

Section 4 - Distribution of Tickets or Passes. Distribution of Event Tickets by the Harbor Department to a Port Recipient shall be carried out by the Executive Director, in accordance with the following requirements:

- (a) The Port Recipient and the Harbor Department treats the Event Ticket(s) as income consistent with applicable federal and state income tax laws; or
- (b) Event Tickets are distributed in accordance with the public purposes stated in Section 3 above, and provided that:
 - 1. Such Event Tickets shall not be earmarked by the original source for use by the particular Port Recipient who uses such Event Tickets;
 - 2. The Harbor Department determines, in its sole discretion, which individual may use the Event Ticket;
 - 3. Port Recipients receiving Event Tickets pursuant to this Policy shall not transfer such Event Tickets to any other person, except to the recipient's spouse, domestic partner recognized by state law, or dependent children, solely for their personal use.
 - 4. No person receiving Event Tickets pursuant to this Policy shall sell or receive reimbursement for the value of any ticket.
- (c) Nothing in this Policy shall relieve individual members of the Los Angeles Board of Harbor Commissioners from their duty under Los Angeles Municipal Code Section 49.5.17 not to participate in or otherwise be involved in the Harbor Department's contracting process where they are not acting as a Board.

Section 5 - Posting of Distribution of Tickets or Passes. Distribution of Event Tickets pursuant to this Policy shall be reported on state form 802 and prominently posted on the Port of Los Angeles website (www.portoflosangeles.org) within 30 days in accordance with CCR Title 2 Section 18944.1 (d) on state Form 802. Such posting shall include:

- (a) The name of the person receiving tickets or passes, except that if the tickets or passes are distributed to an organization outside the Harbor Department, the name, address and description of the organization, and the number of tickets or passes provided to the organization may be posted in lieu of the names of individuals from the organization;
- (b) a description of the event;
- (c) the date of the event;
- (d) the face value of the tickets or passes provided;
- (e) if the tickets or passes are behested, the name of the Commissioner or Harbor Department official who behested the tickets or passes; and
- (f) a description of the public purpose pursuant to this Policy under which the distribution was made or, alternatively, that the tickets or passes were distributed as income to the recipient.



Form 802 Filings - Ticket Policies (Agencies)

- Antelope Valley Air Quality Management District 08.14.2013
- Castaic Lake Water Agency 05.30.2014
- Governor's Office of Business and Economic Development 04.14.2014
- Los Rios Community Colleges 10.20.2014
- Mesa Water District 08.08.2013
- Salinas Valley Memorial Health Systems 05.14.2013
- University of California 5.30.2013 (revised)

Form 802 Filings - Ticket Policies (Agricultural Districts)

- 22nd District Agricultural Association 5.31.2012
- 32nd District Agricultural Association 5.31.2012

Form 802 Filings - Ticket Policies (Cities)

- Adelanto 04.29.2014
- Aliso Viejo 3.26.2012
- Anaheim 4.2.2012
- Anderson 3.26.2012
- Arcadia 5.3.2012
- Arroyo Grande 06.06.2014
- Artesia 3.26.2012
- Atascadero 3.26.2012
- Avalon 3.27.2012
- Azusa 3.27.2012
- Bellflower 3.26.2012
- Beverly Hills 3.26.2012
- Brentwood 3.26.2012
- Buena Park 3.27.2012
- Calabasas 7.16.2012
- Calimesa 3.27.2012
- Carlsbad 3.26.2012
- Carson 3.26.2012
- Indio 3.28.2012
- Imperial Beach 4.16.2012
- Irvine 3.26.2012
- Jurupa 3.26.2012
- Laguna Beach 3.26.2012
- Laguna Woods 6.1.2012
- La Habra 3.28.2012
- Lake Elsinore 9.06.2012
- Lakewood 7.11.2012
- Lancaster 3.26.2012
- La Quinta 3.26.2012
- Lemon Grove 3.26.2012
- Lemoore 4.20.12
- Livermore 05.19.2014
- Lodi 3.27.2012
- Long Beach 4.25.2012
- Los Angeles 10-10-2014
- Manhattan Beach 01.03.2013

- Chowchilla 3.27.2012
- Chino 06.05.2013
- Chula Vista 9.12.2012
- Citrus Heights 07.12.2013
- Covina 4.2.2012
- Cypress 4.2.2012
- Dana Point 2.21.2012
- Desert Hot Springs 4.2.2012
- Duarte 3.26.2012
- El Segundo 8.22.2012
- Elk Grove 3.26.2012
- Escondido 05.01.2013
- Folsom 06.04.2013
- Foster City 3.28.2012
- Fowler 05.22.2013
- Fresno 4.25.2012
- Gilroy 12.16.2014
- Grover Beach 3.26.2012
- Hesperia 3.26.2012
- Hillsborough 4.25.2012
- Indian Wells 04-23-2014
- Riverside 3.28.2012
- Rohnert Park 7.12.2012
- Sacramento 4.3.2012
- Salinas 3.26.2012
- San Bernardino 3.26.2012
- San Clemente 3.26.2012
- San Diego 2.16.2012
- San Jose 2.5.2014
- San Luis Obispo 3.27.2012
- San Marino 3.26.2012
- San Marcos 2.16.2012
- San Pablo 11.06.2014
- San Ramon 4.27.2012
- Santa Barbara 3.27.2012
- Santa Fe Springs 05.13.2013
- Santa Maria 05.28.2014
- Santa Paula 3.26.2012
- Santa Rosa 5.10.2012
- Santee 3.26.2012
- Menifee 3.26.2012
- Mission Viejo 8.29.2012
- Monrovia 3.26.2012
- Moorpark 2.27.2012
- Murrieta 3.23.2012
- Ontario 2.16.2012
- Newport Beach 3.26.2012
- Norco 8.27.2012
- Norwalk 3.26.2012
- Ojai 3.27.2012
- Pacific Grove 3.26.2012
- Palm Desert 3.26.2012
- Palm Springs 5.16.2012
- Pasadena 3.26.2012
- Pismo Beach 10.15.2013
- Placentia 3.26.2012
- Pleasanton 3.27.2012
- Ponoma 4.3.2012
- Port Hueneme 3.26.2012
- Rancho Cordova 3.15.2012
- Rancho Mirage 3.28.2012
- Seaside 5.8.2012
- Signal Hill 5.2.2012
- South Pasadena 3.26.2012
- South San Francisco 4.27.2012
- Stockton 4.2.2012
- Suisun 11-24-2014
- Turlock 4.16.2012
- Union City 7.25.2012
- Victorville 11.25.2013
- Villa Park 3.26.2012
- West Covina 3.27.2012
- West Hollywood 06.19.2014
- Westminster 3.27.2012
- West Sacramento 3.28.2012
- Whittier 09-30-2014
- Windsor 8.29.2012
- Yuba City 3.26.2012
- Yucaipa 3.26.2012

Form 802 Filings - Ticket Policies (Counties)

- Alameda County 2.16.2012
- Los Angeles 4.2.2012
- Orange County Great Park 3.27.2012
- Placer County 04.02.2014
- Riverside 4.2.2012
- Sacramento 3.27.2012
- San Diego County 10.17.2013
- San Francisco Arts Commission 3.8.2010
- San Francisco Film Commission 3.21.2012
- San Francisco Recreation and Park Dept 3.27.2012
- San Francisco Treasure Island 10.30.2013
- San Francisco War Memorial 3.8.2012
- San Mateo County 07.03.2013
- Santa Clara 5.3.2012
- Sonoma County 3.27.2012
- Tulare 3.28.2012

Form 802 Filings - Ticket Policies (Special Districts)

- Antelope Valley Air Quality Management District 3.27.2012
- Castaic Lake Water Agency 3.27.2012
- Dublin San Ramos Service District 4.2.2012
- Foothill De Anza Community College 3.28.2012
- Inland Empire Resource Conservation District 5.10.2012
- LA Harbor Department 4.16.2012
- Mojave Desert Air Quality Management District 3.27.2012
- Orange County Great Park 3.27.2012
- Orange County Water District 12.4.2012
- Port of San Francisco 3.27.2012
- San Bernardino Economic Development Agency 3.26.2012
- San Diego Unified Port District 5.3.2012
- Serrano Water District 3.27.2012
- South Coast Air Quality Management District 4.10.2012
- Tri-City Healthcare District
- Vista Irrigation District 10.10.2013



Los Angeles County
BOARD OF SUPERVISORS POLICY MANUAL

Policy #:	Title:	Effective Date:
3.011	Ticket Policy	06/30/09

PURPOSE

Pursuant to the provisions of Title 2, California Code of Regulations section 18944.1 (b)(2), the County establishes this policy for the receipt and distribution of passes and tickets to, or at the behest of, public officials.

REFERENCE

Title 2, California Code of Regulations, section 18944.1 (b)(2)

April 21, 2009 Board Letter continued to and approved at the June 30, 2009 Board meeting, Board Order No. 9

POLICY

1.0 Application of Policy

1.1 This Policy applies to tickets which provide admission to facility or event for an entertainment, amusement, recreational, social, charitable, or similar purpose, and are either:

- a) Gratuitously provided to the County by an outside source;
- b) Acquired by the County by purchase;
- c) Acquired by the County as consideration pursuant to the terms of

a contract for the use of a County venue; or

d) Acquired and distributed by the County in any other manner.

1.2 This Policy does not apply to any other item of value provided to the County or any County Official, regardless of what received gratuitously or for which consideration is provided.

1.3 This policy, together with the ticket procedures established pursuant to Section 4.2 below, shall supersede and replace the County's March 14, 2002 "Policy for Receipt and Distribution of Passes and Tickets."

2.0 Definitions: Unless otherwise expressly provided herein, words and terms in this policy shall have the same meaning as that ascribed to such words and terms in the California Political Reform Act of 1974 (Government Code Sections 81000, et seq., as the same may from time to time be amended) and the Fair Political Practices Commission ("FPPC") Regulations (Title 2, Division 6 of the California Code of Regulations, Sections 18110 et seq., as the same may from time to time be amended).

2.1 "County" or "County of Los Angeles" shall mean and include the County of Los Angeles, its Special Districts, any other affiliated agency created by the County, and any departments, boards and commissions thereof.

2.2 "County Official" means every elected and appointed official or employee of the County of Los Angeles, as defined in Government Code Section 82048 and FPPC Regulation 18701.

2.3 "County Venue" means and includes the Walt Disney Concert Hall, Performing Arts Center of Los Angeles County, John Anson Ford Amphitheatre, Hollywood Bowl Performing Arts Complex, Santa Fe Dam Recreational Area, Arboretum of Los Angeles County, Descanso Gardens, South Coast Botanic Garden, Virginia Robinson Gardens, Los Angeles County Museum of Art, Museum of Natural History or any other facility owned, controlled or operated by the County of Los Angeles.

2.4 "Immediate family" means spouse and dependent children.

2.5 "Ticket" means and includes any form of admission privilege to a facility, event, show or performance.

3.0 General Provisions.

3.1 No Right to Tickets: The use of complimentary tickets is a privilege extended

by the County and not the right of any person to which the privilege may from

time to time be extended.

3.2 Limitation on Transfer of Tickets: Tickets distributed to a County Official

pursuant to this policy shall not be transferred to any other person, except to members of such County Official's immediate family solely for their personal use.

3.3 Prohibition Against Sale of or Receiving Reimbursement for Tickets: No

person who receives a ticket pursuant to this policy shall sell or receive reimbursement for the value of such ticket.

4.0 Ticket Administrator.

4.1 The Chief Executive Officer or his/her designee shall be the Ticket

Administrator for purposes of implementing the provisions of this policy.

4.2 The Ticket Administrator shall have the authority, in his or her sole discretion,

to establish procedures for the distribution of tickets in accordance

with this policy. All requests for tickets which fall within the scope of this policy shall be made in accordance with the procedures established by the Ticket Administrator.

4.3 The Ticket Administrator shall determine the face value of tickets distributed by the County for purposes of Sections 5.1, 5.2 and 7.1 (d), of this policy.

4.4 The Ticket Administrator, in his or her sole discretion, may revoke or suspend

the ticket privileges of any person who violates any provision of this policy or the procedures established by the Ticket Administrator for the distribution of tickets in accordance with this policy.

5.0 Conditions Under Which Tickets May be Distributed: Subject to the provisions of

this policy, complimentary tickets may be distributed to County Officials under the

following conditions:

5.1 The County Official Reimburses the County for the face value of the ticket(s).

a) Reimbursement shall be made at the time the ticket(s) is/are distributed to the County Official.

b) The Ticket Administrator shall, in his or her sole discretion, determine

which event tickets, if any shall be available under this section.

5.2 The County Official treats the ticket(s) as income consistent with applicable

federal and state income tax laws.

5.3 The County Official uses, or behests, such ticket(s) for one or

more of the

following public purposes:

a) Performance of a ceremonial role or function representing the County

at the event, for which the County Official may receive enough tickets for the County Official and each member of his or her immediate family.

b) The job duties of the County Official require his or her attendance at

the event, for which the County Official may receive enough tickets for the County Official and each member of his or her immediate family.

c) Promoting open government by public official appearances, participation, and/or availability at business or community events.

d) Promoting security and safety at events.

e) Monitoring and evaluating County venues and the quality of performances at those venues.

f) Promoting local and regional businesses, economic development, and tourism activities within the County, including conventions and conferences, and including job creation opportunities.

g) Promoting intergovernmental relations, including but not limited to attendance at an event with or by elected or appointed public officials from other jurisdictions, their staff members and their guests.

h) Promoting public and private facilities available for County

resident use.

- i) Supporting and/or showing appreciation for community and nonprofit programs or services, including youth programs, that benefit County residents.
- j) Encouraging or recognizing significant academic, athletic, or public achievements by County students, residents, or businesses.
- k) Attracting or retaining highly qualified County employees and volunteers or recognizing the meritorious service of current or former County employees, officials, and volunteers, for which such individual may receive no more than four (4) tickets per event.
- l) For use in connection with a County employee competition or drawing, for which there shall be made available no more than (4) tickets per event.

6.0 Tickets Distributed at the Behest of a County Official.

6.1 Tickets shall be distributed at the behest of a County Official only for one or

more public purposes set forth in Section 5.3 above.

6.2 If tickets are distributed at the behest of a County Official, such County

Official shall not use one of the tickets so distributed to attend the event.

7.0 Disclosure Requirements.

7.1 Tickets distributed by the County to any County Official either i) which the

County Official treats as income pursuant to section 5.2 above, or ii) for one or more public purposes described in section 5.3 above, shall be posted on a form provided by the FPPC in a prominent fashion on the County's website within thirty (30) days after

distribution. Such posting shall include the following information:

- a) The name of the recipient, except that if the recipient is an organization, the County may post the name, address, description of the organization and number of tickets provided to the organization in lieu of posting the names of each recipient;
- b) a description of the event;
- c) the date of the event;
- d) the face value of the ticket;
- e) the number of tickets provided to each person or organization;
- f) if the ticket was distributed at the behest of a County Official, the name of the County Official who made such behest; and
- g) a description of the public purpose(s) under which the distribution was made, or, alternatively, that County Official is treating the ticket as income.

7.2 Tickets distributed by the County for which the County receives reimbursement from the County Official as provided under Section 5.1 above shall not be subject to the disclosure provisions of Section 7.1.

RESPONSIBLE DEPARTMENT

-
- Chief Executive Office
 - Executive Office of the Board
 - County Counsel

DATE ISSUED/SUNSET DATE

Issue Date: June 30, 2009

Sunset Date: June 30, 2013

