



TICKET DISTRIBUTION POLICY FOR CITY OFFICIALS

Purpose:

This policy establishes guidelines for the acceptance and distribution of tickets or passes received by the City for use by City officials, including Councilmembers, other elected officials, and designated employees as designated by the City Manager, in compliance with the FPPC regulations. This policy ensures that all ticket distributions are made for legitimate City-related public purposes, documented appropriately, and when appropriate, disclosed to the public through the FPPC Form 802 reporting process.

Applicability:

This policy outlines procedures for the receipt, allocation, and reporting of tickets or passes that provide admission to an entertainment, recreational, or similar event (Tickets) that are:

- a. Donated to the City by an outside source;
- b. Acquired by the City by purchase or by sponsorship;
- c. Received as consideration pursuant to a contract for City venue use; or
- d. Obtained and distributed by the City through any other means.

Definitions:

1. **City Official:** An elected official or City employee required to file a Statement of Economic Interests (Form 700).
2. **FPPC:** The California Fair Political Practices Commission.
3. **Ticket:** Any tickets or pass providing admission to a facility, event, or performance for entertainment, amusement, recreational, or similar purpose (defined in FPPC Regulations 18944.1 and 18946(d)).
4. **Ticket Administrator:** The City Manager or their designee responsible for implementing this policy.
5. **Immediate Family:** Spouse, registered domestic partner, or dependent children.
6. **Designated Employee:** Any employee authorized by the Ticket Administrator to receive tickets under this policy.

General Provisions:

All Tickets received by the City shall be subject to the following provisions:

1. The use of City distributed Tickets is a privilege, not a right.
2. Tickets not accepted by a City official may be reassigned at the discretion of the Ticket Administrator, with priority to City officials; family members may receive tickets if appropriate.



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3. Individual Tickets recipients shall not sell, barter, exchange or transfer in any way Tickets received for any form of payment, reimbursement or other consideration.
4. City officials may only use the benefits included with the distributed Ticket. Any benefits offered within a venue that are not entitlements associated with the Ticket provided (e.g., other items such as food, drinks, souvenirs, VIP areas, or parking are not covered by this policy and may require separate Form 700 reporting by the receiving official.
5. Outside sources providing Tickets may not earmark such Tickets for distribution to specific individuals.
6. The City shall not accept, and this policy explicitly excludes tickets received from the San Francisco 49ers for NFL games. Should any individual officials choose to accept such tickets, they shall comply with all applicable laws and FPPC regulations. Complimentary tickets to special events or to the 49ers Museum at Levi's Stadium are permissible and may be accepted and distributed for a public purpose.
7. All ticket distributions must comply with FPPC regulations and applicable laws.

Public Purpose:

Tickets shall only be distributed for legitimate City-related public purposes, including but not limited to:

1. Attendance at ceremonial occasions.
2. Official welcoming of visiting foreign officials and dignitaries.
3. Promotion of intergovernmental relations and/or coordination of resources with other governmental agencies, including but not limited to, attendance at an event with or by elected, appointed officials from other jurisdictions, their staff members, and their guests.
4. Economic Development outreach or planning.
5. Recognition of participation in City-sponsored or supported projects, community programs, and events.
6. Promotion of cultural, educational, recreational, and community events.
7. Recognition of volunteer, academic, athletic, or public service achievements by students, residents or businesses.
8. Redistribution to the public and City staff.

The following tickets are not covered by this Policy:

- a. A ticket(s) provided by someone other than the City to a City official for admission to an event (Note: This policy only covers tickets provided to the City)



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- b. If the City official reimburses the City: Payment or reimbursement for the face value of the Ticket shall be made within thirty (30) days that the Ticket is distributed to the City official.

Distribution and Administration:

The City Manager or their designee shall manage the receipt and distribution of all tickets subject to this policy by:

- a. Ensuring that Tickets distributed by the City under this Policy serve a City-related public purpose.
- b. Ensuring Tickets distributed pursuant to this Policy are disclosed on the FPPC Form 802 (Attachment 2). The disclosure form shall include the following information:
 - i. The name(s) of the recipient of the Tickets.
 - ii. A description of the event for which Tickets were distributed.
 - iii. The face value of the Ticket.
If the Tickets do not have a face value stated or state something to the effect of "complimentary" or "promotional," the Ticket Administrator will determine the value of the tickets or passes based on the reasonable cost for attendance at such an event.
 - iv. The number of Tickets provided to each person.
 - v. A description of the public purpose furthered by the Ticket distribution.
 - vi. An authorized signature verifying that the distribution of Tickets was made in accordance with the provisions of FPPC Regulations 18944.1 and 18942.

Disclosure and Reporting Requirements:

The City Manager or designee shall submit completed FPPC Form 802 to the City Clerk for posting on the City website within required timeframes established by FPPC regulations following the date of each ticketed event.

Ensuring Tickets distributed pursuant to this Policy are disclosed on the FPPC Form 802 (Attachment 2). The disclosure form shall include the following information:

- i. The name(s) of the recipient of the Tickets.
- ii. A description of the event for which Tickets were distributed.
- iii. The face value of the Ticket.
If the Tickets do not have a face value stated or state something to the



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effect of “complimentary” or “promotional,” the Ticket Administrator will determine the value of the tickets or passes based on the reasonable cost for attendance at such an event.

- iv. The number of Tickets provided to each person.
- v. A description of the public purpose furthered by the Ticket distribution.
- vi. An authorized signature verifying that the distribution of Tickets was made in accordance with the provisions of FPPC Regulations 18944.1 and 18942.

The City Manager or designee shall submit completed FPPC Form 802 to the City Clerk for posting on the City website within required timeframes established by FPPC regulations following the date of each ticketed event.

References

1. Form 802 Agency Report of Ceremonial Role Events and Ticket /Pass Distributions