

County of Monterey Board Policy Manual

Policy Name Distribution, Use, and Reporting of Tickets or Passes Policy	Policy Number G-163	Page 1 of 4
Policy Category Government and Administration		

I. Preamble

This policy establishes a procedure for the distribution, use, and reporting of tickets or passes, provided to the County, to a facility, event, show, or performance for an entertainment, amusement, recreational or similar purpose (hereinafter the “Event”) in compliance with [section 18944.1 of the California Code of Regulations](#) (hereinafter “FPPC Regulation”).¹ FPPC Regulation 18944.1 sets forth circumstances when a public agency's distribution of tickets or passes, when no consideration of equal or greater value is provided by the public official or employee, does not result in a gift to the public official or employee. Tickets or passes to an Event distributed and accounted for in compliance with this policy and FPPC Regulation 18944.1 will not be considered gifts to county officials or employees who make use of donated tickets or passes.

The public purpose in distributing tickets or passes to Events is to promote the County’s resources, programs, and facilities, to monitor and evaluate the County’s venues and the County-sponsored events, and to promote cultural, recreational, and educational facilities, services, and programs available to the public within the County.

This policy is subject to all applicable FPPC Regulations and the Political Reform Act. Nothing in this policy is intended to alter, amend, or otherwise affect the obligations of the County officials and employees under the Political Reform Act and its implementing regulations or under any of the County’s policies or conflict of interest code.

II. Purpose

- a. Any distribution of tickets or passes in accordance with this policy to a County official, or to an individual or organization outside the County at the behest of a County official, must be in furtherance of a public purpose and be reported as provided in this policy. Public purposes under this policy include, but are not limited to, the following (2 C.C.R. § 18944.1(b)(1) and (b)(2)):
 - i. Facilitating the attendance of a County official at an event where the job duties of the County official require their attendance at the event.

¹ The FPPC Regulations can be found in Title 2 of the California Code of Regulations.

- ii. Promotion of intergovernmental relations and/or cooperation and coordination of resources with other governmental agencies, including, but not limited to, attendance at an event with or by elected and/or appointed public officials from other jurisdictions, their staff members, and their guests.
- iii. Official welcoming of visiting foreign officials and dignitaries.
- iv. Promotion of the County's resources and/or facilities available to the public.
- v. Promotion of County-run, sponsored, or supported community programs or events.
- vi. Increasing public exposure to, and awareness of, the various recreational, cultural, and educational venues and facilities available to the public within the County.
- vii. Promoting, supporting, and/or showing appreciation for programs or services rendered by charitable and non-profit organizations benefiting the County's residents.
- viii. Attracting or rewarding volunteer service.
- ix. Attracting and retaining highly qualified employees in County service; recognizing or rewarding meritorious service by a County employee; and/or promoting enhanced County employee performance or morale.

III. Policy

a. Definitions

- i. "Ticket Administrator" means the County Administrative Officer or their designee(s) for the County departments, agencies, and boards and commissions; for the County's elected officials; and the County's elected officials' staff designee. The Ticket Administrator has sole discretion to determine who shall receive the tickets or passes.
- ii. "County official" means every member, officer, employee, or consultant of the County of Monterey, as defined in [Government Code Section 82048](#) and [FPPC Regulation 18701](#). Such term shall include, without limitation, any County board or commission member or other appointed or elected official or employee required to file an annual Statement of Economic Interests (FPPC Form 700).
- iii. "Face value" means the price indicated on the ticket or pass, or when no price is displayed, the price at which a similar ticket or pass would otherwise be offered for sale to the public by the operator of the venue or host of the event who offers the ticket or pass for public sale.
- iv. "Immediate Family" means spouse and dependent children.

- v. “Ticket” means “ticket or pass” as that term is defined in [FPPC Regulation 18944.1](#), as amended from time to time, but which currently defines “ticket or pass” as admission to a facility, event, show, or performance for entertainment.
- b. **Applicability.** This policy applies to tickets or passes that are: (i) gratuitously provided to the County by an outside source; (ii) purchased by the County; (iii) received by the County pursuant to the terms of a contract for use of public property or because the County controls the event; or, (iv) received and distributed by the County in any other manner.

IV. Procedure

a. Exemption from Policy.

- i. **Income.** This policy shall not apply when the County official treats the tickets or passes as income consistent with federal and state income tax laws and the County reports the distribution of the tickets or passes as income to the County official on the FPPC Form 802.
- ii. **Reimbursement.** This policy shall not apply when the County official reimburses the County for the face value of the tickets or passes within thirty (30) days of receipt or acceptance, as defined in the Political Reform Act.

b. Non-Exempt.

i. Distribution.

1. Tickets or passes that are donated or provided by an outside source and earmarked for use by a specific County official by that source are considered gifts to the County official and are subject to the disclosure and reporting requirements applicable to gifts.
2. Tickets or passes received by the County from an outside source without designation as to the specific County official who may use the tickets or passes shall be forwarded to the Ticket Administrator. The Ticket Administrator shall determine the face value of the tickets or passes, the individuals who may use them, and report their distribution.
3. A County official may request use of tickets or passes, or for distribution to an individual or organization outside the County, by completing Part 3 of FPPC Form 802 and submitting the request to the Ticket Administrator.

- ii. **Process of Distribution.** The County Administrative Officer, as the Ticket Administrator under this Policy, hereby designates every elected official and appointed department head as the Ticket Administrator of their office/department and all committees or commissions falling under that office/department. The elected official and appointed department head, with the assistance of that office’s/department’s executive assistant, shall ensure each FPPC Form 802

is completed and then sent to the County Administrative Office for review. The County Administrative Office will then file the form with the Clerk of the Board.

- iii. **Reporting Requirement.** Tickets or passes distributed by the County to a County official, or to an individual or organization outside the County at the behest of a County official, pursuant to this policy, or to a County official for admission to an event at which they will perform a ceremonial role or function on behalf of the County, shall be documented in a completed FPPC Form 802 (see Attachment “A”) or such other form(s) as the FPPC may designate. The completed Form 802 must be filed with the Clerk of the Board within 45 days of distribution of tickets or passes and must be maintained as a public record, be subject to inspection and copying under [Government Code Section 81008](#)(a), and must be posted on the County's website [2 C.C.R. § 18944.1(c) and (d)]. A link to the County's website shall be forwarded to the FPPC for posting on its website.
- iv. **Transfer Prohibition.** A County official who receives tickets or passes distributed by the County according to this policy is prohibited from transferring or giving the tickets or passes to any other person except to members of the County official's immediate family or no more than one guest solely for their attendance at the Event. No person receiving a ticket or pass pursuant to this policy shall sell or receive reimbursement for the value of the ticket or pass (2 C.C.R. § 18944.1(b)(3)).
- v. **Disproportionate Use Prohibition.** The disproportionate use of tickets or passes, distributed pursuant to this policy by a member of the governing body, political appointee, elected official, appointed department head, and Executive Director, is prohibited (2 C.C.R. § 18944.1(b)(4)).
- vi. **Policy Application Limitations.** This Policy and the Form 802 reporting apply only to the benefits the County official receives that are provided to all members of the public with the same class of ticket or pass.
- vii. **Retention of Form 802.** The original Form 802 must be retained by the Clerk of the Board for a period of not less than seven years.

V. Review Date

- a. This Policy will be reviewed for continuance by December 9, 2035.

VI. Board Action

- a. Legistar File Number: RES 25-180, December 9, 2025.