

DATE SUBMITTED 09/25/2025
 SUBMITTED BY City Manager
 DATE ACTION REQUIRED 10/1/25

COUNCIL ACTION ()
 PUBLIC HEARING REQUIRED ()
 RESOLUTION ()
 ORDINANCE 1ST READING ()
 ORDINANCE 2ND READING ()
 CITY CLERK'S INITIALS ()

**IMPERIAL CITY COUNCIL
 AGENDA ITEM**

SUBJECT: DISCUSSION/ACTION: Adopt Resolution No. 2025-51 - Establishing a Ticket Policy 1. Pursuant to FPPC Regulations	
DEPARTMENT INVOLVED:	
BACKGROUND/SUMMARY: The City of Imperial occasionally receives tickets or passes from public and private entities, which are considered public resources. In accordance with FPPC Regulation Section 18944.1, the City is required to establish a formal policy governing the receipt and distribution of these tickets to ensure compliance with state ethics laws. This resolution formalizes the City of Imperial Ticket Policy, outlining the purposes for which tickets may be distributed, the procedures for distribution to public officials, and the necessary public disclosures. The policy aims to promote transparency and align with state regulations while supporting the City's efforts to further public interests and community engagement.	
FISCAL IMPACT: No fiscal impact.	FINANCE INITIALS <u>VMG</u>
STAFF RECOMMENDATION: Adoption of the resolution to establish the ticket policy.	DEPT. INITIALS <u>O.M.</u>
MANAGER'S RECOMMENDATION: <u>approve</u>	CITY MANAGER'S INITIALS <u>OTM</u>
MOTION:	
SECONDED: AYES: NAYES: ABSENT:	APPROVED () REJECTED () DISAPPROVED () DEFERRED () REFERRED TO:

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

A Public Document

1. Agency Name		Date Stamp	California Form 802 <small>For Official Use Only</small>
Division, Department, or Region <i>(if applicable)</i>		<input type="checkbox"/> Amendment <i>(Must Provide Explanation in Part 3.)</i> Date of Original Filing: _____ <small>(month, day, year)</small>	
Designated Agency Contact <i>(Name, Title)</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? Yes No 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)/ Passes	Describe the public purpose made pursuant to the agency's policy
B. Name of Individual <small>(Last, First)</small>	Number of Ticket(s)/ Passes	Identify one of the following:
		Ceremonial Role <input type="checkbox"/> Other <input type="checkbox"/> Income <input type="checkbox"/> <small>If checking "Ceremonial Role" or "Other" describe below:</small>
		Ceremonial Role <input type="checkbox"/> Other <input type="checkbox"/> Income <input type="checkbox"/> <small>If checking "Ceremonial Role" or "Other" describe below:</small>
C. Name of Outside Organization <small>(include address and description)</small>	Number of Ticket(s)/ Passes	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: _____

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

FPPC 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.

Reporting and Public Posting

Ticket Distribution Policies: An agency must post its ticket policy on its website within 30 days of adoption or amendment and e-mail a link of the website location to FPPC at form802@fppc.ca.gov.

Form 802: The use of the ticket or pass under the policy must be reported on Form 802 and posted on the agency's website within 45 days of distribution. A link to the website location of the forms must be e-mailed to FPPC at form802@fppc.ca.gov.

The FPPC will post on its website the link to each agency's policy and completed forms. It is not necessary to send an e-mail each time a new Form 802 is posted. It is only necessary to submit the link if the posting location changes.

This form must be maintained as a public document.

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.

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)/ Passes	Describe the public purpose made pursuant to the agency's policy
B. Name of Individual (Last, First)	Number of Ticket(s)/ Passes	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 (include address and description)	Number of Ticket(s)/ Passes	Describe the public purpose made pursuant to the agency's policy

Print

Clear

RESOLUTION NO. 2025-51

**RESOLUTION OF THE CITY COUNCIL FOR THE CITY OF IMPERIAL
ESTABLISHING A TICKET POLICY PURSUANT TO THE
REQUIREMENTS OF THE FAIR POLITICAL PRACTICES
COMMISSION REGULATIONS**

WHEREAS, the California Fair Political Practices Commission “FPPC” has established Section 18944.1 of the California Code of Regulations relating to tickets or passes to facilities or events for entertainment purposes distributed by the City to, or at the behest of, public officials to restrict the use of event tickets and passes by city officials and employees; and

WHEREAS, from time to time, the City of Imperial receives gifted tickets and passes from public and private entities and individuals, and the City finds that the receipt of such tickets and passes are public resources; and

WHEREAS, in accordance with FPPC Regulation Section 18944.1, the City desires to use such tickets and passes to further public purposes such as for the promotion of City businesses, resources, programs and facilities, and the furtherance of said public purposes may require the distribution to “public officials” as defined in Government Code section 82048 and FPPC Regulation 18701; and

WHEREAS, FPPC Regulation 18944.1 provides for the circumstances and procedures for which the receipt of tickets and passes, and the distribution of said tickets and passes may take place.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF IMPERIAL, CALIFORNIA, DOES HEREBY RESOLVES AS FOLLOWS:

1. To adopt the City of Imperial Ticket Policy attached as Exhibit 1 consistent with the requirements of California Code of Regulations section 18944.1.

APPROVED, PASSED AND ADOPTED at a Regular Meeting of the City Council held on the 30th day of September, 2025.

JAMES TUCKER
Mayor

ATTEST:

KRISTINA SHIELDS,
City Clerk

I, Kristina Shields, City Clerk of the City of Imperial, California, hereby certify that the foregoing Resolution No. 2025-51 was duly adopted at a meeting of the Imperial City Council at its meeting held on the 1st of October, 2025, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of Imperial, California, on October 1, 2025.

KRISTINA SHIELDS,
City Clerk

EXHIBIT 1

CITY OF IMPERIAL TICKET POLICY ADOPTED PURSUANT TO FAIR POLITICAL PRACTICES COMMISSION REGULATION SECTION 18944.1

1. **Purpose:** This policy applies to tickets or passes which provide admission to a facility or event for entertainment, amusement, recreational or similar purpose and which are acquired by the City, to address the Fair Political Practices Commission ("FPPC") Regulation 18944.1, relating to the distribution of event tickets to public officials. As a result of this regulation, all elected, appointed or designated employees of the City of Imperial who receive complimentary tickets must report their acceptance of the same.

2. **Definitions:** Unless otherwise expressly provided herein, words and terms used 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 be amended from time to time.

2.1 **"City" or "City of Imperial"** means the City of Imperial and any other affiliated agency created or activated by the Imperial City Council, and any departments, boards, and commissions, thereof.

2.2 **"City Official"** means every member, elected officer, appointed officer, employee or consultant of the City, as defined in Government Code Section 82048 and FPPC Regulation 18701. This term shall include, without limitation, any City board or commission member or other appointed official or employee required to file an annual Statement of Economic Interests (FPPC Form Statement of Economic Interests, Form 700).

2.3 **"Immediate Family"** means the spouse and dependent children of a City Official.

2.4 **"Ticket" or "Pass"** means any form of admission privilege which allows an individual to gain admission to a facility, building, or real property where an event, show or performance for an entertainment, amusement, recreational, or similar purpose will occur (as defined in FPPC regulations 18944.1 and 18946(d)).

2.5 **"Ticket Administrator"** means the City Manager, Assistant to the City Manager or Human Resources Director of the City of Imperial or his/her designee.

2.6 **"City Venue"** Any facility, building or real property owned, controlled, or operated by the City of Imperial at which events, shows or performances are held, performed or conducted.

3. **General Provisions:**

3.1 **No Right to City Tickets:** The use by a City Official of complimentary tickets received by the City is a privilege extended by the City and is not the right of any person.

3.2 Limitation on Transfer of City Tickets: Tickets distributed to a City Official pursuant to this Policy shall not be transferred to any other person except to a member of such City Official's immediate family solely for their own personal use.

3.3 Prohibition Against Sale of or Receiving Compensation for City Tickets: No person who receives a ticket pursuant to this policy may sell or receive any form of compensation for the value of such ticket(s).

4. Procedure for Distributing Tickets:

4.1 The Ticket Administrator has the sole authority, in his or her discretion, to establish procedures for the distribution of tickets supplemental to and in accordance with this Policy. All receipt or request for tickets from City Officials which fall within the scope of this Policy shall be made in accordance with the procedures established by the Ticket Administrator.

4.2 If the ticket does not have a stated face value, the Ticket Administrator will determine the face value of tickets distributed by the City for purposes of this policy.

4.3 The Ticket Administrator, in his or her sole discretion, may revoke or suspend the ticket privileges of any City Official or person who violates any provision of this Policy or the procedures established by the Ticket Administrator for the distribution of City tickets in accordance with this Policy.

5. Conditions Under Which Tickets May Be Distributed:

Subject to the provisions of this Policy, complimentary tickets may be distributed to City Officials by the Ticket Administrator under either of the following conditions:

5.1 The City Official reimburses the City for the established face value of the ticket(s) as follows:

- a. Reimbursement shall be made at the time the tickets are distributed to the City 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 In accepting the ticket(s), the City Official acknowledges that the value of the tickets may be treated as income in a manner consistent with applicable federal and state income tax laws; or

5.3 The City Official expressly acknowledges to the Ticket Administrator that such ticket(s) will be used for one or more of the following public purposes:

- a. In connection with the Official's performance of a ceremonial role or function representing the City at the event, for which the City Official may receive enough tickets for the City Official and each member of his or her immediate family.

- b. The job duties of the City Official require his or her attendance at an event which has been financially sponsored or supported by the City (whether in whole or in part) and the Official will provide a report to the City Administrator or City Council on whether the City's goals in sponsoring the event appear to have been fulfilled - for which the City Official may receive enough tickets for the City Official and each member of his or her immediate family.
- c. For purposes of fostering positive 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.
- d. Rewarding volunteer public service by a City employee.
- e. Supporting or showing appreciation for programs or services rendered to the community by non-profit organizations which programs or services have benefited Imperial residents.
- f. Encouraging or rewarding significant academic, athletic, or public service achievements by Imperial students, residents, or businesses.
- g. As special recognition for meritorious service by a City employee – for which such employee may receive no more than four (4) tickets per event.
- h. For use in connection with a City employee competition or drawing, for which there shall be made available no more than (4) tickets per event.

6. Tickets Received by a City Official or City Employee other than Through the City Ticket Administrator:

- 6.1. Only the Ticket Administrator shall have authority to receive and accept a gift of tickets given or donated to the City.
- 6.2 Any City employee who receives an offer to donate tickets to the City shall refer the donor to the City Ticket Administrator's Office.

7. Public Disclosure Requirements:

7.1 Tickets distributed by the Ticket Administrator to any City Official pursuant to this policy shall be disclosed on FPPC Agency Report of Ticket Distributions (Form 802) to be posted on the City's website and shall be sent to the FPPC within thirty (30) days after distribution, and shall include the following information:

- the name of the Ticket recipient or City Department, if applicable;
- the date of the event and a description of it;
- the face value of the ticket or, if none, the value of the ticket as determined by the Ticket Administrator;
- the number of tickets provided to each person;

- if the tickets were distributed to another person at the request of a City Official, the name of the City Official who made such request; and
- a description of the public purpose(s) under which the distribution was made, or, alternatively, that the City Official is treating the ticket as income.

7.2 Tickets distributed by the City for which the City receives reimbursement from the City Official are not subject to the disclosure requirements.