



TIFFANY N. NORTH  
COUNTY COUNSEL

November 7, 2023

JEFFREY E. BARNES  
CHIEF ASSISTANT

Board of Supervisors  
County of Ventura  
800 South Victoria Avenue  
Ventura, California 93009

ALBERTO BOADA  
EMILY T. GARDNER  
JOSEPH J. RANDAZZO  
PRINCIPAL ASSISTANTS

**ASSISTANTS**

JOSEPH BRICK  
LISA CANALE  
JASON CANGER  
PHEBE W. CHU  
MITCHELL B. DAVIS  
DAVID EDSALL JR.  
ALISON L. HARRIS  
MARTHA ANN KNUTSON  
CYNTHIA KRAUSE  
KAREN V. MARBLE  
BRETT B. MCMURDO  
ILENE F. MICKENS  
SEAN A. PEREZ  
MARINA PORCHE  
CHRISTINE A. RENSHAW  
JACLYN SMITH  
MATTHEW A. SMITH  
LINDA L. STEVENSON  
THOMAS W. TEMPLE  
FRANCESCA S. VERDIN  
ERIC WALTZ

**SUBJECT:** Adoption of Policy for Inclusion in County Administrative Policy Manual at Chapter II-22 Regarding Distribution of Event Tickets and Passes that are Acquired or Received by the County

**RECOMMENDED ACTION:**

Adopt the attached policy (Exhibit 1) for inclusion in the County's Administrative Policy Manual at Chapter II-22 regarding the distribution of event tickets and passes that are acquired or received by the County.

**FISCAL IMPACT:** None.

**DISCUSSION:**

Your Board's adoption of the attached policy would establish a formal procedure for the County's distribution and use of tickets and passes that are acquired or received by the County and dependent districts that are also governed by your Board (collectively "County") to a facility, event, show or performance for an entertainment, amusement, recreational or similar public function.

The proposed County policy implements a regulation of the California Fair Political Practices Commission set forth at Title 2, Division 6, Section 18944.1 of the California Code of Regulations that requires local entities to adopt a policy governing their distribution of event tickets and passes. (See Exhibit 2.) Tickets and passes distributed in accordance with the attached policy would not be considered gifts to the County officials and employees which must be disclosed on the County official's or employee's Statement of Economic Interests/Form 700.

The County's proposed policy contains the following required provisions, among others:

- 1) Statement of the County's public purposes to be accomplished by the distribution of tickets and passes to County officials, employees and/or outside individuals and entities;
- 2) Requirement that the distribution of tickets and passes pursuant to the policy furthers a public purpose;
- 3) Designation of the County Executive Officer or designee as the County official responsible for distributing tickets and passes pursuant to the policy;
- 4) Prohibition on the sale or transfer of tickets and passes distributed pursuant to the policy; and
- 5) Requirements for the reporting (on FPPC Form 802) and posting on the County's website of ticket and pass distributions.

Adoption of this policy supports the 2024-2027 Strategic Plan values of ethical behavior, transparency, and accountability. This item has been reviewed by the County Executive Office and the Auditor-Controller's Office. If you have any questions, please call me at (805) 654-2581.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Tiffany N. North', followed by a large, stylized circular flourish.

Tiffany N. North  
County Counsel

TNN:tdb

Exhibit 1 – Policy Regarding Distribution of Tickets and Passes Acquired or Received  
by the County  
Exhibit 2 – FPPC Regulation 18944.1