



Exhibit A

Complimentary Ticket Policy

**Policy No.
Resolution no.**

**Agenda: June 19, 2019
Item: 10**

1. Purpose.

The purpose of this Complimentary Ticket Policy (“Policy”) is to establish a fair and equitable process for the distribution of complimentary tickets or passes to EBCE in compliance with the requirements of Section 18944.1 of the Fair Political Practices Commission (“FPPC”) Regulations. This Policy is subject to the California Political Reform Act of 1974, Government Code § 81000, et seq. (“Political Reform Act”) and the FPPC Regulations, Title 2, Division 6 of the California Code of Regulations, Sections 18110 et seq., as they now exist or may hereafter be added or amended.

2. Definitions.

- a. “Event” means an occasion, show, or performance for an entertainment, amusement, recreational, or similar purpose to which admission is granted with a ticket or pass.
- b. “Official” means any member of the EBCE Board of Directors or any EBCE employee.
- c. “Ticket or Pass” means either a “ticket” or a “pass” as defined in FPPC Regulation 18946, as amended from time to time, but which are currently defined as:
 - i. “Ticket.” A “ticket” is anything that provides access, entry, or admission to a specific future event or function and for which similar tickets are sold to the public to view, listen to, or otherwise take advantage of the attraction or activity for which the ticket is sold and includes any benefits that the ticket provides.
 - ii. “Pass.” A “pass” is a ticket that provides repeated access, entry, or admission to a facility or series of events and for which similar passes are sold to the public.

3. Applicability.

This Policy shall only apply to distribution of a ticket or pass to an event or function provided by EBCE to an Official, or at the behest of an Official.

4. Ticket Distribution.

The ticket or pass shall not be earmarked by the original source for use by the Official who uses the ticket or pass. EBCE shall determine in its sole discretion which Official may use the ticket or pass. Specific guidelines for the dissemination of tickets or passes to Events may be established by the Chief Executive Officer or designee pursuant to an administrative procedure.

5. Public Purposes.

Tickets or passes may be provided to an Official subject to this Policy to support any of the following public purposes:

- a. As a part of EBCE's community outreach efforts;
- b. Representing EBCE as an event to sustain or build relationships with businesses or local, regional, state, or federal agencies;
- c. The Event will provide educational information that will benefit the EBCE or Official attending the Event;
- d. The Official's written job duties require the Official to appear at the Event.
- e. Attendance of an Official of the EBCE at the Event will in some other way support the purpose of the EBCE; or
- f. To support general employee morale, retention or to reward public service. [This public purpose may not be used for tickets or passes distributed to members of the Board of Directors, the Chief Executive Officer, or a department head in compliance with FPPC Regulation §18944.1 (e).]

6. Requirement of Public Purposes.

The distribution of any ticket or pass to, or at the behest of, an Official must accomplish a stated public purpose of the agency listed in Section 5 of this Policy.

7. Prohibition Against Transfer.

A ticket or pass distributed to an Official pursuant to this Policy may not be transferred by the Official to any person, except to members of the Official's immediate family or no more than one guest solely for their attendance at the event.

8. Disproportionate Use Prohibited.

The disproportionate use of tickets or passes by a member of the Board of Directors, the Chief Executive Officer, or a department head is prohibited.

9. Record and Reporting.

This Policy shall be posted on the EBCE website within 30 days of adoption or amendment. The record of the distribution of a ticket or pass pursuant to this Policy shall be maintained as a public record and be subject to inspection and copying under California Government Code

Section 81008. In addition, the record of the distribution of a ticket or pass pursuant to this Policy shall be posted on a Form 802 provided by the FPPC on the EBCE website, within 45 days after the distribution.