

Ticket Policy for City Officials



Los Angeles City
ETHICS COMMISSION

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This is an overview. Please contact us with questions.

State law allows a local jurisdiction to adopt a policy regarding the distribution of tickets. This is an overview of the City's ticket policy. Please contact the Ethics Commission with any questions.

A ticket or pass to an event that is open to the public is not a gift to a City official when it is distributed by a City agency in compliance with the distribution and disclosure requirements of the City's ticket policy.

Distribution

Every City agency has a **ticket administrator**, who is one of the following:



General Manager/Department Head



GM or DH's Designee

The ticket administrator may distribute tickets and passes to anyone, including:



City Officials



City Employees



Community Members



Private Organizations

There is no limit to the number of tickets or passes that may be distributed to **organizations** or **individuals who are not City officials**.

All of the following must apply to a ticket or pass in order for the ticket policy to apply:

1 It must be distributed for a **recognized public purpose**, such as advancing the agency's mission or recognizing City employees. A complete list of public purposes is provided in Los Angeles Administrative Code § 24.53(b)(1).

Example: To promote a cultural heritage night, a local theatre donates 25 Hamilton tickets to the Department of Cultural Affairs. The ticket administrator may distribute the tickets to agency volunteers by drawing names from a hat.

Example: Disney donates 10 California Adventure tickets to the Fire Department. The ticket administrator may distribute the tickets to local high school students in recognition of high academic achievement.

2 The recipient must be determined in the **sole discretion** of the ticket administrator.

Example: A local businessperson gives a councilmember two tickets to a Rams game, valued at \$150. The ticket policy does not apply, because the tickets were earmarked for a specific City official (the ticket administrator did not decide who would receive them). The tickets are a gift to the councilmember, may be limited, and must be disclosed.

3 It must be used by **the official, the official's immediate family member, or one guest**. The City official may not sell the ticket or pass.

Example: The LA Philharmonic donates 15 concert tickets to the Library Department. The ticket administrator distributes four of the tickets to a single City official. The City official may attend the concert with two immediate family members and one family friend. The City official may not sell the tickets or give them to anyone other than immediate family or one guest.

4 The ticket administrator may not distribute a **disproportionate number** of tickets or passes to an elected City official, an agency board or commission member, an agency appointee subject to confirmation by the City Council, or the agency's general manager or department head.

Example: The LA Sparks donate 50 game tickets to LACERS. The ticket administrator may not give 35 tickets to one LACERS board member, but the ticket administrator may give the board member six tickets, for use by the board member's immediate family and one guest.

Example: The Dodgers donate 50 game tickets to a City Council office. The ticket administrator may distribute all 50 tickets to a local community group.

Disclosure



All tickets and passes distributed by a City agency must be reported in order to comply with the ticket policy. The ticket administrator must file **Form 802** within **30 days** of distributing tickets or passes. Amendments must be filed within 10 days of a change.

Copies must be filed with both the Ethics Commission and the state's Fair Political Practices Commission. Among other things, the event, the ticket's face value, and the recipient must be disclosed.

Important Notes

- A City official may never solicit a ticket or pass from anyone in exchange for performing an official City act.
- If a City official receives a ticket or pass from someone other than a City agency, it is generally a gift that is subject to limits and must be disclosed on Form 700. Additional information is provided in the gifts brochure at ethics.lacity.org/wp-content/uploads/Gifts-Brochure.pdf.
- The ticket policy only applies to tickets and passes to events that are open to the public. A ticket or admission to a private, invitation-only event is governed by the gift laws.
- If a City official receives a benefit in conjunction with a ticket or pass and the benefit is not provided to all members of the public who have the same type of ticket or pass, that benefit is a gift.
- Form 802 must also be filed to disclose when a City official is admitted to an event for performing a ceremonial role, such as throwing out the first pitch at a baseball game.
- If an elected City official behests a ticket or pass, additional reporting may be required through Form 803.

Compliance

Form 802 and its filing instructions are online under the "Ethics" tab at ethics.lacity.org/forms.

Late filing penalties of \$25 per day, up to a maximum of \$500, apply to a Form 802 that is not filed or amended by the deadline.

Anyone who violates or helps someone else violate the laws regarding gifts, tickets, or passes may be liable for **administrative enforcement penalties** up to the greater of \$5,000 per violation or three times the amount of money at issue.

Potential violations may be reported to the **Ethics Complaint Hotline** anonymously and under protection from retaliation.

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