

EXHIBIT A

Policy/Procedure

Subject: Distribution of Tickets and/or Passes in accordance with Fair Political Practices Commission (“FPPC”) Regulation as set forth in Section 18944.1 of Title 2 of the California Code of Regulations (“Regulation 18944.1”)

1.0 Purpose:

To ensure that tickets and/or passes provided to and distributed by the Irvine Community Land Trust (“Land Trust”) are in furtherance of its Articles of Incorporation, governing policies, and legitimate public purposes associated therewith, consistent with the requirements of public agencies under Regulation 18944.1.

To ensure that tickets and/or passes distributed by the Land Trust under Regulation 18944.1 and this Policy are disclosed on FPPC Form 802 and posted to the Land Trust’s website within thirty days of distribution, as required by Regulation 18944.1.

2.0 Application of Policy

2.1 Types of Tickets: This Policy applies to Tickets that provide admission to a facility, event, show or performance for an entertainment, amusement, recreational or similar purpose, and are either:

- 2.1.1 gratuitously provided to the Land Trust by an outside source;
- 2.1.2 acquired by the Land Trust by purchase;
- 2.1.3 acquired by the Land Trust as consideration pursuant to the terms of a contract for the use of a Land Trust venue; or
- 2.1.4 acquired and distributed by the Land Trust in any other manner.

2.2 Policy Applicable to Tickets Only: This Policy shall only apply to the Land Trust’s distribution of Tickets to, or at the behest of, a Land Trust Official. This Policy does not apply to any other item of value provided to the Land Trust or any Land Trust Official, regardless of whether received gratuitously or for which consideration is provided. This includes food, beverage or a gift provided to a Land Trust Official at an event that is not included in the fair market value of the Ticket.

3.0 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 Section 81000 et seq., as the same may from time to time be amended) and the FPPC Regulations (Title 2, Division 6 of the

California Code of Regulations, Section 18110 et seq., as the same may from time to time be amended).

- 3.1 “Immediate family” shall mean and refer to a spouse and dependent children.
- 3.2 “Land Trust” shall mean and include the Irvine Community Land Trust, a California nonprofit corporation.
- 3.3 “Land Trust Official” shall mean and refer to every member, officer, employee or consultant of the Land Trust, consistent with the definition applicable to local public agencies in Government Code Section 82048 and FPPC Regulation 18701. Such term shall include, without limitation, any Land Trust board, or committee member or other appointed official or employee required to file an annual Statement of Economic Interests (FPPC Form 700).
- 3.4 “Policy” shall mean and refer to this Policy for the Distribution of Tickets and/or Passes.
- 3.5 “Ticket” shall mean and refer to a “ticket or pass” for admission privilege to a facility, event, show or performance for an entertainment, amusement, recreational or similar purpose.

4.0 General Provisions

- 4.1 No Right to Tickets: The use of Tickets is a privilege extended by the Land Trust and not the right of any person to which the privilege may from time to time be extended.
- 4.2 Limitation on Transfer of Tickets: Tickets distributed to a Land Trust Official pursuant to this Policy shall not be transferred to any other person, except to members of such Land Trust Official’s immediate family solely for their personal use.
- 4.3 Prohibition Against Sale of or Receiving Reimbursement for Tickets: No person who receives a Ticket pursuant to this Policy shall sell or receive reimbursement for the value of the Ticket.
- 4.4 No Earmarking of Ticket Given to Land Trust: No Ticket gratuitously provided to the Land Trust by an outside source and distributed by the Land Trust to, or at the behest of, a Land Trust Official pursuant to this Policy shall be earmarked by the original source for provision to a particular Land Trust Official.

5.0 Ticket Administrator

- 5.1 The Executive Director of the Land Trust shall be the Ticket Administrator for purposes of implementing the provisions of this Policy.

5.2 The Ticket Administrator shall have the authority, in his or her sole discretion, to establish procedures for the purchase and or distribution of Tickets in accordance with this Policy. All requests for Tickets that fall within the scope of this Policy shall be made in accordance with the procedures established by the Ticket Administrator.

5.3 The Ticket Administrator shall determine the face value of Tickets distributed by the Land Trust for purposes of Sections 6.1, 6.2 and 8.4.4 of this Policy.

5.4 The Ticket Administrator, in his or her sole discretion, may revoke or suspend the Ticket privileges of any person who violates any provision of this Policy.

6.0 Conditions Under Which Tickets May be Purchased and/or Distributed

Subject to the provisions of this Policy, complimentary Tickets may be distributed to Land Trust Officials under the following conditions:

6.1 The Land Trust Official reimburses the Land Trust for the face value of the Ticket(s).

6.1.1 Reimbursement shall be made at the time the Ticket(s) is/are distributed to the Land Trust Official.

6.1.2 The Ticket Administrator shall, in his or her sole discretion, determine which event Tickets, if any, shall be available under this section.

6.2 The Land Trust Official treats the Ticket(s) as income consistent with applicable federal and state income tax laws.

6.3 The Land Trust Official uses, or behests, such Ticket(s) for one or more of the following governmental and/or public purposes, which shall be consistent with the Land Trust's Articles of Incorporation, governing policies, and legitimate public purposes associated therewith:

6.3.1 Facilitating the attendance of a Land Trust Official at an event where the job duties of the Land Trust Official require his or her attendance at the event.

6.3.2 Promotion of Land Trust resources and or facilities available to the public.

6.3.3 Promotion of Land Trust-run, sponsored or supported community programs or events,

6.3.4 Promoting, supporting and or showing appreciation for programs or services rendered by charitable and non-profit organizations benefiting City of Irvine residents.

- 6.3.5 Increasing public exposure to, and awareness of, the various programs, projects and facilities available to the public by the Land Trust.
- 6.3.6 Attracting or rewarding volunteer service.
- 6.3.7 Attracting and retaining highly qualified employees in Land Trust service; recognizing or rewarding meritorious service by a Land Trust employee; and or promoting enhanced Land Trust employee performance or morale.
- 6.3.8 Recognizing contributions made to the Land Trust by former members of the Land Trust Board of Directors, Land Trust employees, or other appointed officials.

7.0 Tickets Distributed at the Behest of a Land Trust Official

- 7.1 Only the following Land Trust Officials shall have authority to behest Tickets: Members of the Board of Directors, President, Secretary, and the Executive Director.
- 7.2 Tickets shall be distributed at the behest of a Land Trust Official only for one or more public purposes set forth in Section 6.3.

8.0 Disclosure Requirements

- 8.1 This Policy shall be posted on the Land Trust website in a prominent fashion.
- 8.2 Tickets provided to Land Trust officials as part of their official duties, or Tickets provided so that the Land Trust Official may perform a ceremonial role or function on behalf of the Land Trust are not be subject to this Policy and are exempt from any disclosure requirements under Section 8.0. A ceremonial role or function includes, but is not limited to, making a speech, participating in a panel or seminar, presenting an award or proclamation, or cutting a ribbon.
- 8.3 Tickets distributed by the Land Trust for which the Land Trust receives reimbursement from the Land Trust Official as provided under Section 6.1 shall not be subject to the disclosure provisions of Section 8.0.
- 8.4 Tickets distributed by the Land Trust to any Land Trust Official either 1) which the Land Trust official treats as income pursuant to Section 6.2, or 2) for one or more public purposes described in Section 6.3, shall be disclosed on Form 802 provided by the FPPC in a prominent fashion on the Land Trust's website within thirty (30) days after distribution. Such posting shall include the following information:

- 8.4.1 The name of the recipient, except that if the recipient is an organization, the Land Trust may post the name, address, description of the organization and number of Tickets provided to the organization in lieu of posting the names of each recipient;
- 8.4.2 a description of the event;
- 8.4.3 the date of the event;
- 8.4.4 the face value of the Ticket;
- 8.4.5 the number of Tickets provided to each person
- 8.4.6 if the Ticket is distributed at the behest of a Land Trust Official, the name of the Land Trust Official who made such behest; and
- 8.4.7 a description of the public purpose(s) under which the distribution was made, or, alternatively, the Land Trust Official is treating the Ticket as income.

[End of Policy]