

# **STATE RACE TRACK LEASING COMMISSION**

## **Event Ticket Policy**

Date Adopted: September 5, 2025

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Note: Should any provision in this Event Ticket Policy (Policy) contradict any provision of California law, California law shall control.

### **Purpose**

#### **1.0 Application of Policy**

- 1.1 This Policy applies to Tickets that provide admission to the Del Mar Race Track for an entertainment, amusement, recreational or similar purpose, and are:
  - 1.1.1 Gratuitously provided to the State Race Track Leasing Commission (“Commission”) by an outside source;
  - 1.1.2 Acquired by the Commission by purchase;
  - 1.1.3 Acquired by the Commission as consideration pursuant to the terms of a contract for the use of the Del Mar Racetrack; or
  - 1.1.4 Acquired and/or distributed by the Commission in any other manner.
- 1.2 This Policy does not apply to any other item of value provided to the Commission or any Commission Official, regardless of whether received gratuitously or for which consideration is provided.
- 1.3 This Policy shall be posted in a prominent place on the website of the 22<sup>nd</sup> District Agricultural Association, [www.delmarfairgrounds.com](http://www.delmarfairgrounds.com).

### **Definitions**

- 2.0 **Definitions.** Unless otherwise expressly provided in this Policy, 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 from time to time be amended).

- 2.1 “Commission” shall mean and refer to the State Race Track Leasing Commission.
- 2.2 “Commission Official” means every Commissioner, officer, employee, or consultant of the Commission, as defined in Government Code Section 82048. “Commission Official” shall include, without limitation, any member of the Commission or any other appointed Commission official or Commission employee required to file an annual Statement of Economic Interests (Fair Political Practices Commission Form 700).
- 2.3 “Del Mar Racetrack” means and includes the race track facilities located on the 22nd District Agricultural Association’s property.
- 2.4 “FPPC” means the California Fair Political Practices Commission.
- 2.5 “Immediate Family” means the spouse or registered domestic partner and dependent children, as set forth in Government Code section 82029 and Family Code section 297.5.
- 2.6 “Policy” means this State Race Track Leasing Commission Event Ticket Policy.
- 2.7 “Ticket” means and includes any form of admission privilege to a facility, event, show, concert, or performance.

## **Policy**

### **3.0 Conditions Under Which Tickets May Be Distributed to Commission Officials.**

Subject to the provisions of this Policy, the Commission will distribute complimentary Tickets to Commission Officials under any of the following conditions or governmental and/or public purposes:

- 3.1 Performance of a ceremonial role or function representing the Commission at the event, for which the Commission Official may receive enough Tickets for the Commission Official and each member of the Commission Official’s Immediate Family, or no more than one guest of the Commission Official, solely for their personal use.
- 3.2 The official and/or job duties of the Commission Official require their attendance at the event, for which the Commission Official may receive

enough Tickets for the Commission Official and each member of the Commission Official's Immediate Family or no more than one guest of the Commission Official, solely for their personal use.

- 3.3 Economic or business development purposes on behalf of the Commission, including, but not necessarily limited to promotion and marketing of the Del Mar Racetrack; increase of ancillary revenue for food, beverage, parking and related items during the summer and fall thoroughbred horse racing meets at the Del Mar Racetrack; marketing of sponsorship programs; and, promotion of Commission recognition, visibility, and/or profile on a local, state, national, or international scale.
- 3.4 Intergovernmental relations purposes, 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.
- 3.5 Community relations.
- 3.6 Attracting or rewarding volunteer public service.
- 3.7 Recognition of contributions made to the Commission by former members of the Commission, for which such former Commissioner may receive no more than (4) Tickets per event.
- 3.8 The Commission Official reimburses the Commission for the face value of the Ticket(s), including any applicable fees and service charges. Under this Section 3.8, reimbursement shall be made at the time the Ticket(s) is/are distributed to the Commission Official.
- 3.9 The Commission Official treats the Ticket(s) as income consistent with applicable federal and state income tax laws.
- 3.10 The Commission Official and (a) the Commission Official's Immediate Family, or (b) no more than one guest of the Commission Official, uses the Ticket(s) for their own personal use.
- 3.11 The Commission Official behests such Ticket(s) in accordance with Section 4 below.

#### 4.0 Tickets Distributed at the Behest of a Commission Official

- 4.1 Only Commission Officials shall have authority to behest Tickets.

- 4.2 If Tickets are distributed by the Commission at the behest of a Commission Official, such Commission Official shall not (a) use one of the Tickets so distributed to attend the event, or (b) use any of the Ticket(s) so distributed for the Commission Official's Immediate Family or no more than one guest of that Commission Official, to attend the event.

## 5.0 General Provisions

- 5.1 No Right to Tickets. The use of complimentary Tickets is a privilege extended by the Commission and not the right of any person to which the privilege may from time to time be extended.
- 5.2 Limitation on Transfer of Tickets. Tickets distributed to a Commission Official pursuant to this Policy shall not be transferred to any other person, except to members of such Commission Official's Immediate Family or to no more than one guest of the Commission Official, solely for their personal use.
- 5.3 Prohibition Against Sale of or Receipt of Reimbursement for Tickets. No person who receives a Ticket pursuant to this Policy shall sell or receive reimbursement for the value of such Ticket.
- 5.4 No Earmarking of Tickets to Commission Official. No Ticket gratuitously provided to the Commission by an outside source and distributed to, or at the behest of a Commission Official pursuant to this Policy, shall be earmarked by the original source for distribution to a particular Commission Official.

## 6.0 Ticket Administrator

- 6.1 Identification of Ticket Administrator. Commissioner Kathlyn Mead shall be the Ticket Administrator for purposes of implementing the provisions of this Policy and may delegate this responsibility within the Commission as necessary.
- 6.2 Authority of Ticket Administrator. The Ticket Administrator shall have the authority, in their sole discretion, to establish procedures for the distribution of Tickets in accordance with this Policy. All requests for Tickets which fall within the scope of this Policy shall be made in accordance with the procedures established by the Ticket Administrator.
- 6.3 Ticket Face Value Determination. The Ticket Administrator shall determine the face value of Tickets distributed by the Commission for purposes of

Sections 3.8, 3.9 and 7.1.4, of this Policy. Face value will include any applicable fees and service charges.

- 6.4 Authority to Revoke Ticket privileges. The Ticket Administrator, in their sole discretion, may revoke or suspend the Ticket privileges of any person who violates any provision of this Policy or the procedures established by the Ticket Administrator for the distribution of Tickets in accordance with this Policy. If the Ticket Administrator revokes or suspends the Ticket privileges of any person under this Section 6.4, at a subsequent meeting of the Commission, the Ticket Administrator shall report the name of the person whose rights or privileges were revoked or suspended.
- 6.5 Preparation and Publication of Required Disclosure Forms. The disclosure forms required by Section 7.0 of this Policy shall be prepared and posted by the Ticket Administrator, or by an individual acting under the Ticket Administrator's authority, supervision, and control.

## 7.0 Commission Disclosure Requirements

- 7.1 Tickets distributed by the Commission to or at the behest of any Commission Official (i) which the Commission Official treats as income pursuant to Section 3.9 above, or (ii) for one or more public purposes described in Sections 3.1 and 3.2 through 3.7 above, shall be posted on FPPC Form 802 by the Commission, or any successor form provided by the FPPC, in a prominent fashion on the website of the 22<sup>nd</sup> District Agricultural Association, [www.delmarfairgrounds.com](http://www.delmarfairgrounds.com), within thirty (30) days after distribution. Such posting shall include the following information:
- 7.1.1 The name of the recipient, except that if the recipient is an organization, the Commission may post the name, address, description of the organization and number of Tickets provided to the organization in lieu of posting names of each recipient;
  - 7.1.2 a description of the event;
  - 7.1.3 the date of the event;
  - 7.1.4 the face value of the Ticket;
  - 7.1.5 the number of Tickets provided to each person;

7.1.6 if the Ticket was distributed at the behest of a Commissioner, the name of the Commissioner who made such behest; and

7.1.7 a description of the public purpose(s) under which the distribution was made, or, alternatively, that the Commission Official is treating the Ticket as income.

7.2 Tickets distributed by the Commission for which the Commission receives reimbursement from the Commission Official as provided under Section 3.8 above shall not be subject to the disclosure provisions of Section 7.1.

## 8.0 Prohibition on Disproportionate Use of Tickets

8.1 In accordance with California Code of Regulations, Title 2, Section 18944.1, this Policy prohibits the disproportionate use of tickets or passes by any Commission Official or by any chief administrative officer of the Commission.