TRABUCO CANYON WATER DISTRICT ETHICS POLICY BOARD APPROVED MAY 19, 2022

The purpose of this Ethics Policy is to ensure that all Trabuco Canyon Water District (**District**) directors and employees (together, "Personnel") comply with all applicable statutory and administrative requirements pertaining to their actions, duties and responsibilities on behalf of or in relation to the District. These matters include, but are not limited to, "conflicts of interests," "potential conflicts of interest," "incompatible offices" and other activities which might reflect adversely on the District or District Personnel.

District Personnel shall conduct themselves in a manner so as not to give rise to improprieties or situations inconsistent with this Policy. Procedures, policies and records shall be established and maintained to verify that the Policy has been adhered to by all District Personnel. District Personnel shall recognize that this Policy and applicable laws are concerned with not only actual conflict or wrongdoing but the potential or appearance of conflict. District Personnel shall not use the prestige or influence of their positions for personal gain or advantage.

Unless otherwise expressly defined, the terms used in this Policy shall have the same meanings as in the Political Reform Act (Title 9 of the California Government Code) and the regulations issued by the Fair Political Practices Commission (FPPC) pursuant to the Political Reform Act.

SECTION 1. PERSONNEL RESPONSIBILITY.

SECTION 1.1. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS. All District Personnel shall comply with all applicable provisions of the Political Reform Act, the FPPC Regulations issued under the Political Reform Act, Section 1090 et seq. of the California Government Code (prohibitions on self-interest in contracts), and all other laws and regulations pertaining to conflicts of interest and incompatible public offices. These include, but are not limited, to the following requirements:

- (a) **Reporting** of economic interests required annually, and upon assuming office and leaving office, by employees who are "Designated Persons" (as defined in the District's Conflict of Interest Code, Attachment A-1) on FPPC Form 700;
- (b) Compliance with **prohibitions on acceptance of gifts and honoraria** above the dollar limit per source set pursuant to state law;
- (c) **Disqualification** from participation in District decisions in which the employee knows or has reason to know the employee has a financial interest.

SECTION 1.2. GIFTS TO THE DISTRICT. Unless a gift qualifies as a gift to the District under this section, it will be treated as a gift to the director or employee. A gift of <u>passes or tickets</u> (not including travel or lodging) may be considered a gift to the District and not to an individual director or employee only under the following circumstances:

- (a) The General Manager receives and distributes the tickets or passes to employees, spouses and immediate families, and the donor does not earmark them for any specific employee(s), and the General Manager retains a record of the terms under which the tickets or passes were accepted by the District and the terms under which they were distributed and to whom they were distributed; or
- (b) The tickets or passes are distributed in accordance with the written policy adopted by the District setting forth the District purpose in distributing passes and tickets and prohibiting

the subsequent transfer except to the official's immediate family for their personal use (see Attachment B-1).

A payment (a gift other than passes or tickets, including a monetary payment, loan, gift, and a payment for or provision of goods or services, as long as it is not in excess of an applicable District reimbursement rate for travel, meals, lodging or other expenses) may be considered a gift to the District and not to an individual employee only under the circumstances allowed in the FPPC regulations. These include the following: the General Manager or his/her designee receives and controls the payment, the payment is used only for official District business, the General Manager determines which employee(s) shall use the payment, the donor does not earmark them for any specific employee(s), and a record of all of the foregoing is filed and maintained with the District Secretary within 30 days of receipt of the payment and is posted by the District Secretary on the District's website. A payment to the District cannot include travel expenses for an elected official or any official who manages public investments (these officials are designated by the District in the District's Conflict of Interest Code), or any travel that the General Manager or his/her designee has not preapproved in writing before the date of the trip.

All gifts to the District must be submitted with either the "Gift of Tickets or Passes to Trabuco Canyon Water District" or "Gift to Trabuco Canyon Water District (Other Than Tickets or Passes)" form to the General Manager's Office for approval and distribution. These forms can be obtained from the District Secretary and must be approved by the General Manager or his/her designee.

SECTION 1.3. ENTERTAINING. Reimbursement of dining or entertainment expenses for District purposes shall be subject to approval and shall be limited by the District's policy with respect to allowance of expenses. [Trabuco Canyon Water District Expense Reimbursement Policy and as may be amended from time to time]

SECTION 1.4. OUTSIDE CONSULTING, BUSINESS ACTIVITY OR EMPLOYMENT. All outside business, enterprise, consulting work or employment by District employees must be preapproved by the General Manager or, in the case of the General Manager, by the President of the Board of Directors.

District Personnel shall not engage in any employment, activity, or enterprise which is inconsistent, incompatible or in conflict with their duties as District personnel or with the duties, functions, or responsibilities of the District.

District employees are prohibited from performing consulting work for or providing any other services or goods to any persons or firms doing business with the District. District employees shall not perform any business, enterprise, work, service, or counsel outside of their District employment where any part of their efforts will be subject to approval by any other officer, employee or board of the District, unless otherwise approved in the manner prescribed by this Policy.

An employee's outside employment, activity, business or enterprise may be prohibited if it:

- (a) Involves the use for private gain or advantage of his or her District time, facilities, equipment and supplies; or the badge, uniform, prestige, or influence of his or her District office or employment:
- (b) Involves receipt or acceptance by the employee of any money or other consideration from anyone other than the District for the performance of an act which the employee, if not performing such act, would be required or expected to render in the regular course

- or hours of his or her District employment or as a part of his or her duties as a District employee;
- (c) Involves the performance of an act in other than his or her capacity as a District employee which act may later be subject directly or indirectly to the control, inspection, review, audit, or enforcement of any other District employee or the District; or
- (d) Involves efforts or time demands as would render performance of his or her duties as a District employee less efficient. The General Manager (or the President, in the case of the General Manager) will notify the employee whether any outside employment, consulting work, activity, business or enterprise is approved or disapproved. Appeal from such determination may be made to the Board of Directors.

Nothing in this Section shall relieve employees from the requirement to report and other requirements applicable to outside employment, consulting work, activity, business or enterprise under Section 1.1 of this Policy and FPPC regulations.

SECTION 1.5. PROHIBITED ACTIVITIES RELATING TO CAMPAIGNS. District Personnel may not use, or permit others to use, District resources for a campaign activity, or personal or other purposes which are not authorized by law (Gov. Code § 8314). California law prohibits the expenditure of public funds or the use of a public office to campaign for or against candidates for public office or any other election issue.

SECTION 1.6. USE OF DISTRICT VEHICLES. District vehicles are used for the express purpose to conduct District business, and any other use is expressly prohibited. Only employees with a valid California Driver's License that have been put on the District's insurance may operate District vehicles. Employees using District vehicles must comply with the following:

- (a) Employees whose jobs require regular driving for business as an essential job function must, as a condition of employment, be able to meet the driver approval standards of this policy at all times.
- (b) Employees who need transportation in the course of their normal work may be assigned a District vehicle for their use. All other employees needing transportation for District business may use vehicles assigned to their department or those drawn from the motor pool. As a last alternative, when no District vehicles are available, employees may use their own vehicles for business purposes with prior approval of their supervisor.
- (c) Employees who use their personal vehicles for approved District purposes will receive a mileage allowance equal to the IRS optional mileage allowance for such usage. This allowance is to compensate for the cost of gasoline, oil, depreciation, and insurance.
- (d) Employees who drive a vehicle for District business must exercise due diligence to drive safely and to maintain the security of the vehicle and its contents. Use of handheld cell phones (including texting) while behind the wheel of a moving vehicle being used on District business is strictly prohibited. Employees are responsible for any driving infractions or fines as a result of their driving.
- (e) Employees are not permitted, under any circumstances, to operate a District vehicle or a personal vehicle for District business when any physical or mental impairment causes the employee to be unable to drive safely. Additionally, employees shall not operate any District vehicle at any time or operate any personal vehicle while on District business while using or consuming alcohol, illegal drugs, or prescription medications that may affect their ability to drive. These prohibitions include circumstances in which the employee is temporarily unable to operate a vehicle safely or legally because of impairment, illness, medication, or intoxication.
- (f) Non-employees and non-District passengers (e.g., family and friends) are prohibited from riding in District vehicles.

(g) Employees must report any accident, theft, or malicious damage involving a District vehicle to their supervisor and Human Resources, regardless of the extent of damage or lack of injuries. Such reports must be made as soon as possible but no later than 24 hours after the incident. Employees are expected to cooperate fully with authorities in the event of an accident and should respond to investigating officers' questions consistent with risk management training.

SECTION 2. DISCIPLINARY ACTIONS FOR NON-COMPLIANCE. Non-compliance with this Policy shall subject the employee to disciplinary actions commensurate with the violation, up to and including termination.

SECTION 3. ADMINISTRATION. The District Secretary shall be responsible for administration of this Policy, under the direction of the Board of Directors and the General Manager.

ATTACHMENT A-1: DESIGNATED PERSONS FOR DISCLOSURE PURPOSES PURSUANT TO CONFLICT OF INTEREST CODE



Conflict of Interest Code EXHIBIT A

Entity: Water Districts

Agency: Trabuco Canyon Water District

Position	Disclosure Category	Files With	
Assistant General Manager	OC-01	СОВ	
Board Member	OC-01	СОВ	
Consultant	OC-30	СОВ	
District Engineer	OC-01	СОВ	
District Secretary	OC-01	СОВ	
District Treasurer	OC-01	COB COB	
General Legal Counsel	OC-01		
General Manager	OC-01		
Principal Engineer	OC-01	COB	

Total: 9

ATTACHMENT A-2: ECONOMIC INTERESTS THAT MUST BE REPORTED PURSUANT TO CONFLICT OF INTEREST CODE



Disclosure Descriptions EXHIBIT B

Entity: Water Districts

Agency: Trabuco Canyon Water District

Disclosure Category	Disclosure Description
OC-01	All interests in real property in Orange County, the authority or the District as applicable, as well as investments, business positions and sources of income (including gifts, loans and travel payments).
OC-30	Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest category in the code subject to the following limitation: The County Department Head/Director/General Manager/Superintendent/etc. may determine that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure required. The determination of disclosure is a public record and shall be filed with the Form 700 and retained by the Filing Officer for public inspection.

Grand Total: 2

ATTACHMENT B-1:

POLICY FOR DISTRIBUTION OF TICKETS OR PASSES IN ACCORDANCE WITH FAIR POLITICAL PRACTICES COMMISSION (FPPC) REGULATION 18944.1 OF TITLE 2 OF THE CALIFORNIA CODE OF REGULATIONS

1. PURPOSE

This Policy for Distribution of Tickets or Passes (**Policy**) ensures that tickets provided to and distributed by the Trabuco Canyon Water District (**District**) are in furtherance of a governmental and/or public purpose as required under Regulation 18944.1 and this Policy. This Policy also ensures that tickets distributed by the District under Regulation 18944.1 and this Policy are disclosed on FPPC Form 802 (see Attachment B-2) and posted to the District's website within 45 days of distribution as required by Regulation 18944.1.

2. 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 Regulation, Section 18110 et seq., as the same may from time to time be amended).

- a. "TCWD" or "District" shall mean and include the Trabuco Canyon Water District and any other affiliated agency created or activated by the District, and any departments, boards, and commissions thereof.
- b. "District Official" shall mean and refer to every member, officer, employee, or consultant of the Trabuco Canyon Water District, as defined by Government Code Section 82048 and FPPC Regulation 18701. Such terms shall include, without limitation, any District board or committee member or other appointed official or employee required to file an annual Statement of Economic Interest (FPPC Form 700).
- c. "Immediate family" shall mean and refer to spouse and dependent children.
- d. "Policy" shall mean and refer to this Policy for Distribution of Tickets or Passes.
- e. "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.

3. APPLICATION OF POLICY

- a. 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:
 - i. Gratuitously provided to the District by an outside source;
 - ii. Acquired by the District by purchase;
 - iii. Acquired by the District as consideration pursuant to the terms of a contract for the use of a District venue; or
 - iv. Acquired and distributed by the District in any other manner.
- b. This Policy shall only apply to the District's distribution of tickets to, or at the behest of, a District Official. This Policy does not apply to other items of value provided to the District or any District Official, regardless of whether received gratuitously or for which consideration is provided. This includes food, beverage, or a gift provided to a District Official at an event that is not included in the fair market value of the ticket.

4. GENERAL PROVISIONS

- a. The use of tickets is a privilege extended by the District and not the right of any person to which the privilege may from time to time be extended.
- b. Tickets distributed to a District Official pursuant to this Policy shall not be transferred to any other person except to members of such District Official's immediate family or no more than one quest solely for their attendance at the event.
- c. No person who receives a ticket pursuant to this Policy shall sell or receive reimbursement for the value of the ticket.
- d. No ticket gratuitously provided to the District by an outside source and distributed by the District to, or at the behest of, a District Official pursuant to this Policy shall be earmarked by the original source for provision to a particular District Official.
- e. Tickets or passes may not be disproportionately used by a member of the Board of Directors, a chief administrative officer, political appointee, or department head of the District.

5. TICKET ADMINISTRATOR

- a. The General Manager or his/her designee shall be the ticket administrator for purposes of implementing the provisions of this Policy.
- b. The General Manager or his/her designee shall have the authority, in his or her 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 General Manager or his/her designee.
- c. The General Manager or his/her designee shall determine the face value of tickets distributed by the District for the purposes of Sections 6.a., 6.b., and 8.d.1. of this Policy.
- d. The General Manager or his/her designee, in his or her discretion, may revoke or suspend the ticket privileges of any person who violates any provision of this Policy.

6. CONDITIONS UNDER WHICH TICKETS MAY BE PURCHASED AND/OR DISTRIBUTED

Subject to the provisions of this Policy, complimentary tickets may be distributed to District Officials under the following conditions:

- a. The District Official reimburses the District for the face value of the ticket(s).
 - i. Reimbursement must be made within 30 days of receipt of the ticket(s).
 - ii. The General Manager or his/her designee shall, in his or her discretion, determine which event tickets, if any, shall be available under this section.
 - iii. Ticket(s) that are reimbursed by the District Official within 30 days of receipt of the ticket(s) are not subject to the disclosure requirements under Section 8.
- b. The District Official treats the ticket(s) as income consistent with applicable federal and state income tax laws.
 - i. Ticket(s) that are received as income by the District Official are not subject to the disclosure requirements under Section 8.
- c. The District Official uses, or behests, such ticket(s) for one or more of the following governmental and/or public purposes:
 - i. Facilitating the attendance of a District Official at an event where the job duties of the District Official require his or her attendance at the event.
 - ii. Promotion of intergovernmental relations and/or cooperation and coordination of resources with other governmental agencies, 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.
 - iii. Promotion of District resources and/or facilities available to the public.
 - iv. Promotion of District-run, sponsored, or supported community programs or events.
 - v. Promoting, supporting, and/or showing appreciation for programs or services rendered by charitable and non-profit organization benefiting District customers.

- vi. Promotion of business or economic activity, development, and/or redevelopment within the District's service area.
- vii. Exchange programs with foreign officials and dignitaries.
- viii. Promotion of District recognition, visibility, and/or profile on a local, state, national, or international level.
- ix. Promotion of open government by District Official appearances, participation, and/or availability at business and/or community events.
- x. Increasing public exposure to, and awareness of, the various educational venues and facilities available to the public through the District.
- xi. Attracting or rewarding volunteer service.
- xii. Encouraging or rewarding significant academic, athletic, or public service achievements by students, residents, or businesses within the District service area.
- xiii. Attracting and retaining highly qualified employees in District service; recognizing or rewarding meritorious service by a District employee; and/or promoting enhanced District employee performance or morale.
- xiv. Recognizing contributions made to the District by former District Board Members, District Employees, or other District Officials.

7. TICKETS DISTRIBUTED AT THE BEHEST OF A DISTRICT OFFICIALS

- a. Only the following District Officials shall have the authority to behest tickets: (1) Elected or Appointed Board of Directors Members and (2) the General Manager or his/her designee.
- b. Tickets shall be distributed at the behest of a District Official only for one or more public purposes set forth in Section 6.c.

8. DISCLOSURE REQUIREMENTS

- a. This Policy shall be posted on the District website in a prominent manner within 30 days of adoption or amendment of the Policy.
- b. Tickets provided to District Officials as part of their official duties, or tickets provided so that the District Official may perform a ceremonial role or function on behalf of the District, are not to be subject to this Policy and are exempt from any disclosure requirements under Section 8. 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.
- c. Tickets distributed by the District for which the District receives reimbursement from the District Official as provided under Section 6.a. shall not be subject to the disclosure provisions of this Section 8.
- d. Tickets distributed by the District to any District Official for which the District Official treats as income as provided under Section 6.b. shall not be subject to the disclosure provisions of this Section 8
- e. Tickets distributed by the District to any District Official for one or more public purposes described in section 6.c. shall be disclosed on Form 802 (see Attachment B-2) provided by the FPPC in a prominent fashion on the District's website within 45 days after distribution. Such posting shall include the following information:
 - i. The name of the recipient, except that if the recipient is an organization, the District 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;
 - ii. A description of the event;
 - iii. The date of the event;
 - iv. The face value of the ticket:
 - v. The number of tickets provided to each person;
 - vi. If the ticket is distributed at the behest of a District Official, the name of the District Official who made such behest;

- vii. If the ticket was transferred to a person under Section 4.b., the relationship of the transferee;
- viii. If received for the oversight or inspection of facilities, a written inspection report of findings and recommendations by the District Official receiving the ticket or pass; and
- ix. A description of the public purpose(s) under which the distribution was made.

ATTACHMENT B-2: FAIR POLITICAL PRACTICES COMMISSION (FPPC) FORM 802

Agency Report of: Ceremonial Role Events and Ticket/Pass Distributions

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1. Agency Name			Date Stamp	California 802
Division, Department, or Region (if applicable)				For Official Use Only
Designated Agency Contact (Name, Title)				
Anna Cada/Dhana Numban F mail			Amendment (Must I	Provide Explanation in Part 3.)
Area Code/Phone Number E-mail			Date of Original Filing:	(month, day, year)
2. Function or Event Information				
Does the agency have a ticket policy? Yes	□ No□ Fa	ace Value of	Each Ticket/Pass \$ _	
Event Description:	Da	ate(s)	//	
Provide Title/ Expla Ticket(s)/Pass(es) provided by agency? Yes		no:		
			Name of Source	
Was ticket distribution made at the behest Yes of agency official?	□ No□ "	yes:	Official's Name (Last, First)	
3. Recipients	illes Centien Dán id		and Alac Continue Chairleant	
Use Section A to identify the agency's department or unit.	Number Number			
A. Name of Agency, Department or Unit	of Ticket(s)/ Passes	Describe th	e public purpose made pu	rsuant to the agency's policy
			- 3500	
B. Name of Individual (Last, First)	Number of Ticket(s)/ Passes		Identify one of the	following:
	v		nonial Role Other Cking "Ceremonial Role" or "Other" di	
			nonial Role Other Other Cking "Ceremonial Role" or "Other" de	
C. Name of Outside Organization (include address and description)	Number of Ticket(s)/ Passes	Describe th	e public purpose made pu	rsuant to the agency's policy
4. Verification				
I have read and understand FPPC Regulations 18944 with the requirements.	4.1 and 18942. I	have verified	that the distribution set i	forth above, is in accordance
Signature of Agency Head or Designee P	Print Name		Title	(month, day, year)
Comment:				

This form is for use by all state and local government agencies. The form identifies persons that receive admission tickets and passes and describes the public purpose for the distribution. This form was prepared by the Fair Political Practices Commission (FPPC) and is available at www.fppc.ca.gov.

General Information

FPPC Regulation 18944.1 sets out the circumstances under which an agency's distribution of tickets to entertainment events, sporting events, and like occasions would not result in a gift to individuals that attend the function. In general, the agency must adopt a policy which identifies the public purpose served in distributing the admissions. The Form 802 serves to detail each event and the public purpose of each ticket distribution. FPPC Regulation 18942 lists exceptions to reportable gifts, including ceremonial events, when listed on this form.

When the regulation procedures are followed, persons, organizations, or agencies who receive admissions are listed on a Form 802. Agency officials do not report the admissions on the official's Statement of Economic Interests, Form 700, and the value of the admission is not subject to the gift limit.

The Form 802 also informs the public as to whether the admissions were made at the behest of an agency official and whether the behested tickets were provided to an organization or to specific individuals.

Exception

FPPC This form is not required for admission provided to a school or university district official, coach, athletic director, or employee to attend an amateur event performed by students of that school or university.

Reporting and Public Posting

Ticket Distribution Policies: An agency must post its ticket policy on its website within 30 days of adoption or amendment and e-mail a link of the website location to FPPC at form802@fppc.ca.gov.

Form 802: The use of the ticket or pass under the policy must be reported on Form 802 and posted on the agency's website within 45 days of distribution. A link to the website location of the forms must be e-mailed to FPPC at form802@fppc.ca.gov.

The FPPC will post on its website the link to each agency's policy and completed forms. It is not necessary to send an e-mail each time a new Form 802 is posted. It is only necessary to submit the link if the posting location changes.

This form must be maintained as a public document.

Privacy Information Notice

Information requested by the FPPC is used to administer and enforce the Political Reform Act. Failure to provide information may be a violation subject to administrative, criminal, or civil penalties. All reports are public records available for inspection and reproduction. Direct questions to FPPC's General Counsel.

Instructions

Part 1. Agency Identification:

List the agency's name. Provide a designated agency contact person, their phone number, and e-mail address. Mark the amendment box if changing any information on a previously filed form and include the date of the original filing.

Part 2. Function or Event Information:

Confirm that your agency has a policy for ticket distribution. Unless the ceremonial role or income box in Part 3, Section B, is marked, this form is only applicable if your agency has a policy.

Complete all of the other required fields that identify the ticket value, description of event, date(s) and whether the ticket was provided by the agency or an outside source. If an agency official behests the tickets, the official's name is also required. Use the comment field or an attachment to explain in full.

Part 3. Ticket Recipients:

This part identifies who uses the tickets. The identification requirements vary depending upon who received the tickets and are categorized into three sections. Each section must list the number of tickets received. Use the comment field or an attachment to explain in full.

Section A. Report tickets distributed to agency staff, other than an elected official or governing board member, pursuant to the agency's policy. It is not necessary to list each employee's name, but identify the unit/department for which the employee works. The agency must describe the public purpose associated with the ticket distribution. A reference to the policy is permissible.

Section B. Report: 1) any agency official who performs a ceremonial role; 2) any agency official who reports the value as income; or 3) tickets used by elected officials and governing board members (including those distributed pursuant to the agency's policy).

Section C. Report tickets provided to an organization. The organization's name, an address (website url is permissible), and a brief description of the public purpose are required.

Agency Report of: Ceremonial Role Events and Ticket/Pass Distributions Continuation Sheet



	Recipients							
	• Use Section A to identify the agency's department or unit. •Use Section B to identify an individual. Use Section C to identify an outside organization.							
	Name of Agency, Department or Unit	of Ticket(s)/ Passes	Describe the public purpose made pursuant to the agency's policy					
-								
-		,						
E	Name of Individual (Last, First)	Number of Ticket(s)/ Passes	Identify one of the following:					
-			Ceremonial Role Other Income If checking "Ceremonial Role" or "Other" describe below:					
_	-		Ceremonial Role Other Income If checking "Ceremonial Role" or "Other" describe below:					
-			Ceremonial Role Other Income If checking "Ceremonial Role" or "Other" describe below:					
			Ceremonial Role Other Income If checking "Ceremonial Role" or "Other" describe below:					
(Name of Outside Organization (include address and description)	Number of Ticket(s)/ Passes	Describe the public purpose made pursuant to the agency's policy					
-								
-								
-								

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