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COUNTY OF SAN DIEGO

INTER-DEPARTMENTAL CORRESPONDENCE

February 28, 1986

TO: Members, Board of Supervisors
Chief Administrative Officer

CONFIDENTIAL

FROM: County Counsel

RE: Tickets to Jack Murphy Stadium Events

The question has arisen as to whether Board members and the Chief Administrative Officer are required to report the stadium tickets received from the City of San Diego on their financial disclosure statements. The question has arisen because the members of the San Diego City Council are not required to report said tickets on their financial disclosure statements.

By memorandum dated March 27, 1978, we concluded that tickets to stadium events should be included by Supervisors and the Chief Administrative Officer as gifts on financial disclosure statements, and that conclusion is still correct. City Council members receive the tickets from their employer, the City of San Diego, and the tickets to the Council members are received as compensation from a public entity which is exempt from disclosure (Gov. Code, § 82030(b)(2).) The members of the Board of Supervsors and the Chief Administrative Officer are not officers or employees of the City of San Diego, and, therefore, the tickets are reportable as gifts. We have discussed this matter with the legal staff of the Fair Political Practices Commission, and the Fair Political Practices Commission agrees with the conclusion set forth in our 1978 opinion.

LLOYD M. HARMON, JR., County Counsel

By Arne Hansen

ARNE HANSEN, Deputy

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