



# City of Cooper City City Policies and Procedures

<b>SUBJECT</b>	Acceptance, Control and Distribution of Tickets to Charitable and Other Events
<b>POLICY # 01.018</b>	
<b>Approval:</b>	

## I. Purpose and Intent

The purpose of this policy is to promote transparency, accountability, and compliance with the Florida State Ethics Code (Ch. 112, F.S.), the Broward County Ethics Code (Sec. 1-19, County Code of Ordinances), the Florida Public Records Act (Ch. 119, F.S.), and applicable records retention schedules with respect to the receipt, acceptance, control, tracking, distribution, and disposition of charitable and other event admissions and tickets obtained by or on behalf of the City of Cooper City.

This policy is intended to safeguard public trust, ensure the proper use of City-acquired admissions and tickets, and provide clear guidance to elected officials, officers, and employees regarding ethical obligations related to the acceptance of such gifts. This policy is further implemented at the recommendation of the Broward County Office of the Inspector General, as set forth in its Closing Memorandum No. OIG 25-013-M, dated September 9, 2025.

## II. Scope

This policy applies to:

- All elected officials of the City of Cooper City;
- All City officers and employees; and
- Any admissions or tickets to events, attractions, performances, or charitable functions obtained by the City through any means and from any source, including but not limited to donations, complimentary admissions, purchases, sponsorships, or exchanges.

## III. Definitions

For purposes of this policy:

- **Admission or Ticket** means any pass, ticket, credential, or right of entry to an event, venue, or attraction, whether physical or electronic.
- **Consideration** means any payment, reimbursement, service, sponsorship, or other thing of value given in exchange for an admission or ticket.

- **Public Purpose** means a purpose that serves a legitimate governmental, civic, or community interest of the City of Cooper City.

“Entrance fees, admission fees, or tickets to events, performances, or facilities,” are included within the definitions of “gifts” as set forth in Sec. 112.312(12)(a)(10), F.S.

#### **IV. Responsibility for Control and Oversight**

- A. The City Clerk shall be responsible for the centralized receipt, control, tracking, and distribution of all admissions and tickets acquired by the City.
- B. No admissions or tickets shall be accepted, distributed, or transferred on behalf of the City except through the designated process established under this policy.

#### **V. Receipt and Documentation of Admissions and Tickets**

Upon receipt of any admission or ticket from an external source or through the purchase of a sponsorship by the City, the individual receiving the ticket shall document, at a minimum:

1. The date the admission or ticket was received;
2. The name of the donor or source providing the admission or ticket;
3. The event, attraction, or function to which the admission or ticket applies;
4. The date(s) and location of the event or attraction;
5. The number of admissions or tickets received;
6. The estimated fair market value of each admission or ticket, if known; and
7. Any consideration provided by the City in exchange for the admission or ticket.

#### **VI. Distribution and Disposition of Admissions and Tickets**

A. When the City purchases and distributes an admission or ticket, the City Manager, or his/her designee, shall document:

1. The date of distribution;
2. The name and official title of the individual receiving the admission or ticket;
3. The total number of admissions or tickets provided to the recipient for a single event or attraction;
4. Any consideration or reimbursement provided by the recipient to the City, if applicable; and
5. The specific public purpose served by the distribution.

B. Admissions and tickets shall only be distributed for a documented public purpose and shall not be distributed for personal benefit or private gain.

C. Elected officials and employees receiving admissions or tickets are prohibited from transferring them to others unless such transfer is documented and complies with this policy and applicable ethics laws.

#### **VII. Ethics Compliance and Gift Reporting**

A. Upon receipt of any admission or ticket, elected officials and City employees shall review their obligations under the Florida State Ethics Code and the Broward County Ethics Code to determine whether the admission or ticket constitutes a reportable gift to themselves or their guest(s).

B. Elected officials and other City employees who are subject to the Form 9 quarterly gift disclosure requirements set forth in Sec. 112.3148, F.S. who receive permitted admissions or tickets valued in excess of \$100.00 shall file a CE Form 9 no later than the end of the calendar quarter following the quarter in which the admissions or tickets were received, if required by law. This includes such individuals who accept tickets and subsequently give them to others or otherwise dispose of them.

### **VIII. Records Retention and Public Records Compliance**

All records related to the receipt, acceptance, control, distribution, and disposition of admissions and tickets shall be preserved in accordance with the Florida Public Records Act and the State of Florida records retention schedule, as may be amended from time to time.

### **IX. Training and Implementation**

The City shall provide training to elected officials, officers, and employees on this policy and related ethics and public records requirements.

### **X. Effective Date**

This policy shall take effect upon adoption by the City Commission of the City of Cooper City and shall remain in effect unless amended or repealed.