



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

April 20, 2026

City of Tracy: City Clerk's Office
April B.A. Quintanilla, City Clerk
Via email: cityclerk@cityoftracy.org

Advisory Letter re FPPC No. 2023-00582; City of Tracy

Dear City of Tracy:

The Enforcement Division of the Fair Political Practices Commission ("FPPC") enforces the provisions of the Political Reform Act (the "Act").¹ This letter is in response to a sworn complaint alleging violations of the Act's reporting requirements for ceremonial role events and ticket/admission distribution (Form 802).

Pursuant to the Act and its implementing regulations, local government agencies are required to use a form provided by the Commission (the "Form 802") to record the receipt of gifts it receives and distributes to others. The Act also requires that within 45 days of distribution of a ticket or pass, the distribution must be reported on the Form 802.² Additionally, the Form 802 must be submitted to the Commission for posting on its webpage as well as uploaded to the agency's website and maintained by the agency as a public record subject to inspection and copying.³

Regulation 18944.1 requires that an agency adopt a policy that addresses the manner of receipt and distribution of such tickets.⁴ The City of Tracy ("the City") has developed such a policy and incorporated by reference Regulation 18944.1. The City's Ticket and Gift Distribution Policy ("the Policy") provides that completed Form 802s will be posted in a prominent fashion on the City's website after distribution. Additionally, the agency must identify the public purpose of the event pursuant to its policy or indicate if the official's role is ceremonial in nature.⁵

The Enforcement Division's investigation determined that the City of Tracy failed to timely file four Form 802s within 45 days of distribution of tickets for the calendar years of 2020 through 2024 and failed to timely post three Form 802s on the City's website. Additionally, several Form 802s improperly identified a ceremonial role that did not meet the applicable definition.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Regulation 18944.1 subd. (d).

³ Section 81008(a) and Regulation 18944.1 subd. (d)(3).

⁴ Regulation 18944.1 subd. (b).

⁵ Regulations 18944.1 subd. (b)(1) & 18942 subd. (a)(13).

The City has since filed and posted all Form 802s for public inspection and amended the forms to correctly identify ceremonial roles and applicable public purposes. Accordingly, no violation is being pursued.

In the interest of public disclosure, we recommend that the City comply with its Tickets and Passes Distribution Policy going forward and ensure the timely filing and posting of all Form 802s.

If you have questions at a later date please visit our website at <http://www.fppc.ca.gov/advice.html>. If you have further questions you can have your questions answered by experienced staff, either by emailing advice@fppc.ca.gov or by calling 1-866-ASK-FPPC (1-866-275-3772). Telephone advice is available Monday through Thursday from 9:00 a.m. to 11:30 a.m..

If you have any questions regarding this letter, please contact me at LColumbel@fppc.ca.gov or (279) 237-5974.

Sincerely,

Laura Columbel

Laura Columbel
Senior Commission Counsel
Enforcement Division

CC: Bijal Patel and Nancy Young