



Via First Class Mail and  
email at [tregalado@miamigov.com](mailto:tregalado@miamigov.com)

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DEPUTY GENERAL COUNSEL

March 29, 2012

The Honorable Tomás P. Regalado  
Office of the Mayor  
City of Miami City Hall  
3500 Pan American Drive  
Miami, FL 33133

Re: INQ 12-56, Gift Exceptions

Dear Mayor Regalado:

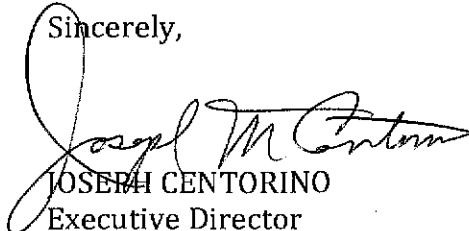
On March 27, 2012, you asked if you are required to file a gift disclosure for the expenses you were reimbursed when you recently traveled to Lima, Peru. The purpose of your trip was to sign a memorandum of understanding that reactivated the sister city relationship between Lima and Miami.

Because you were performing an official duty and conducting official business on behalf of the City of Miami, these travel expenses are not a gift to you. Consequently, under the Miami-Dade County Code at Sec. 2-11.1 (e)(2)(e), you are not required to report them as gifts.

Similarly under the City of Miami Ordinance at Sec. 2-613, the expenses are not considered gifts because they were given for the use and benefit of the City.

Please be advised, however, that this opinion construes the Miami-Dade County Ethics Code and City of Miami Conflicts of Interest Code only and is not applicable to conflicts under other County, municipal or state laws. Questions concerning the state ethics law should be addressed directly to the State Ethics Commission.

Sincerely,

  
JOSEPH CENTORINO  
Executive Director