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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, May 05, 2014 9:21 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Ethics Opinion- Angel Zayon, Chief of Communications and Protocol, City of Miami (Gift Disclosure) INQ 14-115

INQ 14-115

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**From:** Centorino, Joseph (COE)  
**Sent:** Friday, May 02, 2014 4:52 PM  
**To:** 'Mendez, Victoria'  
**Cc:** Wysong, George K.; Min, Barnaby; Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ - Angel Zayon, Chief of Communications and Protocol, City of Miami (Gift Disclosure)

Ms. Mendez:

You have inquired on behalf of Angel Zayon, Chief of Communications and Protocol for the City of Miami, regarding whether expenses paid by Aeromexico for a trip by Mr. Zayon to Mexico in order to strengthen a “sister city” relationship as well as to promote tourism, investments and international trade, should be disclosed as a gift on FORM 9 Quarterly Gift Disclosure. You have informed that Aeromexico is not a county lobbyist, vendor or contractor. Assuming that there is no quid pro quo involved and that the complimentary travel is not connected to any decision being made by the city affecting the private interest of the donor (in which case the gift could be prohibited under Section 2-11.1(e) of the County Ethics Ordinance), and there is some legitimate public purpose involved in the trip, such that it justifies the expenditure of city resources in Mr. Zayon’s traveling out of the country to perform these services, then the acceptance of the travel is not prohibited. However, insofar as it is being paid not by the city but by a private entity and has a value of more than \$100, it must be reported as a gift on the proper disclosure form pursuant to Section 2-11.1(e)(4). This opinion is consistent with prior opinions we have provided concerning Mayor Regalado and Commissioner Sarnoff.

Sincerely,

Joseph M. Centorino  
Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust

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**From:** Mendez, Victoria [<mailto:VMendez@miamigov.com>]  
**Sent:** Friday, May 02, 2014 11:27 AM  
**To:** Centorino, Joseph (COE)  
**Cc:** Wysong, George K.; Min, Barnaby  
**Subject:** RE: Trip to Merida

To the best of our knowledge it is being sponsored by Aeromexico – Mexico & Yucatan Tourism Boards. No lobbyists or anything like that.

**Victoria Méndez, City Attorney**



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Local Government  
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**From:** Centorino, Joseph (COE) [<mailto:CENTORI@miamidade.gov>]  
**Sent:** Friday, May 02, 2014 9:44 AM  
**To:** Mendez, Victoria  
**Cc:** Wysong, George K.; Min, Barnaby  
**Subject:** RE: Trip to Merida

This does not say who is paying for the trip and what their relationship is to the city. Please advise.

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**From:** Mendez, Victoria [<mailto:VMendez@miamigov.com>]  
**Sent:** Wednesday, April 30, 2014 5:03 PM  
**To:** Centorino, Joseph (COE)  
**Cc:** Wysong, George K.; Min, Barnaby  
**Subject:** Fwd: Trip to Merida

Hello. Please assist. We agree that it is in his official capacity.

Sent from my iPhone

Begin forwarded message:

**From:** "Zayon, Angel" <[azayon@miamigov.com](mailto:azayon@miamigov.com)>  
**Date:** April 30, 2014 at 3:44:41 PM EDT  
**To:** "Mendez, Victoria" <[VMendez@miamigov.com](mailto:VMendez@miamigov.com)>, "Min, Barnaby" <[bmin@miamigov.com](mailto:bmin@miamigov.com)>  
**Subject:** Trip to Merida

Good Afternoon,

I will be traveling to Merida, Mexico tomorrow in my capacity for the Mayor's International Council to strengthen our sister city relationship and promote tourism, investments, and international trade. The trip organizers are covering the expenses and does not represent a cost to the City of Miami.

Are these expenses reportable under FORM 9 Quarterly Gift Disclosure? Please advise.

**Angel Zayon**

Chief of Communications and Protocol  
Executive Director, Mayor's International Council

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