

Meyers, Robert (COE)

INQ 06-135

From: Meyers, Robert (COE)
Sent: Friday, September 15, 2006 4:23 PM
To: 'MiamiArchInc@aol.com'
Subject: RE: Taghi Afkham

Mr. Afkham,

I understand from our telephone conversation that you have questions about the use of confidential and proprietary information that might have obtained during the course of your employment with the Trust and the extent to which you can do business with the Trust now that you are separated from the Trust.

If you were to use confidential or proprietary information you received as an employee of the Trust to your benefit or the benefit of a future employer, it would be a violation of the county's ethics rules, which is applicable to current and former Trust employees. The purpose of including this in the settlement agreement is simply a reminder to you that you are held to this standard and could be charged with an ethics violation if you engaged in this conduct.

Regarding post-employment activities, you may work for contractors doing business with the Trust and/or Jackson Memorial Hospital as long as you are not lobbying the Trust. There is a rule that prohibits former employees of the Trust from lobbying the Trust for two years after their service with the Trust ceases. In your case, you have to evaluate the interactions you have with Trust employees on behalf of the independent contractors who have hired you, and as long as you are not lobbying Trust personnel, you are not in violation of the Two Year Rule.

If you wish to pursue Jackson contracts yourself, there is a strong likelihood that you have to lobby Jackson in order to receive a contract. Therefore, you would be free to seek this type of work only after the two year period has expired. If there is no lobbying involved in your pursuit of Jackson work, then the Two Year Rule does not apply.

If you have any further questions, feel free to contact me at your convenience.

Sincerely,

Robert Meyers, Executive Director
Miami-Dade Commission on Ethics and Public Trust
(305) 350-0613

From: MiamiArchInc@aol.com [mailto:MiamiArchInc@aol.com]
Sent: Wednesday, September 13, 2006 1:04 AM
To: Meyers, Robert (COE)
Subject: Fwd: Taghi Afkham

Mr. Meyers,

Thank you for your time speaking to me. Attached are the questions which I asked you in our conversation this morning. Would you please send me your interpretations.

Thank you

Taghi Afkham

9/15/2006

Meyers, Robert (COE)

From: MiamiArchInc@aol.com
Sent: Wednesday, September 13, 2006 1:04 AM
To: Meyers, Robert (COE)
Subject: Fwd: Taghi Afkham
Attachments: RE: Taghi Afkham

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Thank you for your time speaking to me. Attached are the questions which I asked you in our conversation this morning. Would you please send me your interpretations.

Thank you

Taghi Afkham

Meyers, Robert (COE)

From: Clayton, Arla [AClayton@um-jmh.org]
Sent: Friday, September 01, 2006 1:40 PM
To: 'MiamiArchInc@aol.com'
Subject: RE: Taghi Afkham

Taghi, I did consult with our hospital attorney Eugene Shy, Assistant County Attorney. He recommended that you contact Robert Meyers or Ardythe Walker, the Executive Director and General Counsel for the Ethics Commission at (305)579-2594 for responses to your questions. Arla

-----Original Message-----

From: MiamiArchInc@aol.com [mailto:MiamiArchInc@aol.com]
Sent: Tuesday, August 29, 2006 6:23 PM
To: AClayton@um-jmh.org
Subject: Taghi Afkham

Dear Arla,

I am writing regarding concerning the Settlement Agreement Between The Public Health Trust and Taghi Afkham. The Agreement states the following:

"Item 7. Use of Confidential and Proprietary Information.

a. Pursuant to the Miami-Dade County Conflict of Interest and Code of Ethics, Mr. Afkham shall refrain from using any and all confidential and proprietary information obtained by him during the course of his employment with the Trust. To which, Mr. Afkham:

i. Shall not accept any employment or engage in any business or professional activity which he might reasonably expect would require or induce him to disclose confidential and proprietary information acquired by him during his employment with the Trust."

The questions are these:

1. Are there any restrictions about my working with or for the independent contractors for professional services (i.e. architects) who work with the Jackson Health System or may work with the Jackson Health System in the future as long as I do not disclose any confidential and proprietary information?

2. Can I pursue Jackson Health System as an independent contractor myself? Is there a time restriction because of my former employment?

9/15/2006

Thank you for clarifying these matters for me. If you have any questions, I can either be reached through my e-mail address or (786)380-9177.

Very truly yours,

Taghi Afkham

9/15/2006