

**Frigo, Victoria (COE)**

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**From:** Frigo, Victoria (COE)  
**Sent:** Monday, November 15, 2010 3:10 PM  
**To:** 'cellis@miamigov.com'  
**Cc:** Thompson, Robert A. (COE)  
**Subject:** RE: Ethics Question - Leukemia & Lymphoma Society Charity Golf Event Invitation  
**Attachments:** Gift Form.pdf

Dear Mr. Ellis:

As a newly appointed Assistant Director of the City of Miami's Risk Management Department, you asked if you may accept a gift from the Ace Insurance Group to participate in a charity golf event.

Section 2-613 of the City Code permits you to accept a gift from Ace Insurance Group *as long as* Ace Insurance Group does not currently have a contract or a purchase order with the City and will not contract or receive a purchase order with the City in the future. Additionally, under the County Code at Sec. 2-11.1 (e)(4), gifts valued over \$100 must be disclosed by the end of the next business quarter on a prescribed form.

Although not prohibited by law, we advise you that an appearance of impropriety may occur if Ace Insurance Group were to contract *indirectly* with the City through a third-party insurance broker.

The facts as we understand them are as follows: Ace Insurance Group is a multinational insurance company that offers several types of insurance policies and services through brokers. The sponsor of the golfing event is Aon Corporation, an international insurance broker. In your previous employment in Naples, Fla., you were involved professionally in this golfing event, which benefits the Leukemia & Lymphoma Society. You received an invitation to participate in this year's tournament based on your personal and professional relationships with Ace and Aon chairmen, presidents, and representatives, dating back more than 20 years.

For your convenience, I've attached a gift disclosure form, which you should submit to the City Clerk by March 31, 2011, if the gift is valued at more than \$100.

Please feel free to contact me if I can be of further assistance.

Sincerely,

Victoria Frigo, Staff Attorney  
Miami-Dade County Commission on Ethics  
Direct Phone: 305 350-0601  
Fax: 305 579-0273

The logo for miamidade.gov, featuring the text "miamidade.gov" in a blue sans-serif font, followed by a green palm tree icon.

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**From:** Ellis, Calvin [mailto:cellis@miamigov.com]  
**Sent:** Friday, November 12, 2010 10:38 AM  
**To:** Meyers, Robert (COE)  
**Subject:** Ethics Question - Leukemia & Lymphoma Society Charity Golf Event Invitation  
**Importance:** High

Mr. Meyers;

My name is Calvin Ellis and I joined the City of Miami as the Assistant Director of Risk Management about 3 months ago. This morning I received a last minute invitation to join a golf foursome for a charity golf event scheduled for Monday morning (November 15) from Ace Insurance Group, a global insurance company. The charity event is for the Leukemia & Lymphoma Society and is being sponsored by Aon, an international insurance broker. The City does not currently employ the services of either Ace Insurance Group or Aon.

My relationships, both personally and professionally, with both Ace and Aon representatives goes back more than 20 years. I know the chairmen and presidents of both organizations and have dealt with a great many of their representatives throughout my professional career. Most recently as the Director of Risk Management for WCI Communities, Inc., I provided assistance and support for the annual Ace Classic Golf Event that was hosted at the WCI-owned golf resort, Ritz Tiburon in Naples, Florida for several years.

The City procures its insurance coverage through an insurance broker and would never be in the position of dealing with Ace Insurance Group directly. Participating in the charity golf event will not and does not obligate either the City or me in any way to favor or procure the services of Ace Insurance Group.

As I am new to the public entity sector and given the emphasis on transparency and ethics compliance, I want to make sure that I am not violating any ethics codes by accepting the invitation. I am planning to take a personal vacation day to attend the function if you advise that it does not violate any ethics rules. I attended an ethics workshop conducted by Robert Thompson on October 22, 2010 for the City of Miami.

Thanks in advance for your assistance in this matter.



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