

2014 Lobbyist Registration Audit of Michael Brown

FINDING

Mr. Michael Brown failed to timely register as a lobbyist for his employer (see Registrations section).

EMPLOYER

- Boehringer Ingelheim Pharmaceuticals, Inc.

REGISTRATIONS

Mr. Brown registered as a lobbyist for one employer during 2014. Based on the audit documentation, Mr. Brown was an employee of Boehringer Ingelheim Pharmaceuticals Inc. with duties that included lobbying during 2014. He had those responsibilities at the beginning of 2014, thus the lobbyist had a relationship with his employer that should have been registered within seven days of the commencement of the year which is January 8, 2014. Mr. Brown did not register until July 28, 2014, 201 days late. The Bureau of Ethics and Campaign Finance's lobbyist records indicate Mr. Brown paid all registration fees.

LOBBYING AGREEMENTS

Based on a review of the audit documentation provided by Mr. Brown, he was a direct employee of the employer. The employer had no employment contract with the lobbyist employee. However, per statements of the lobbyist and review of his job description, it appears the terms of employment were within the statutes for lobbying activities including having no terms for contingency payments based on lobbying success.

FAMILY OR BUSINESS ARRANGEMENTS WITH PUBLIC OFFICIALS

Mr. Brown reported he had no business or familial relationships with persons who were officials in the legislative branch or officials in the executive branch.

TRAINING

The Bureau of Ethics and Campaign Finance's lobbyist records indicate Mr. Brown completed his required lobbyist training for the 2014 registration year and paid all training fees.