

## **2016 Lobbyist Registration Audit of Jen Lacey**

### **FINDING(S)**

**Jen Lacey failed to timely register for three of her employers** (See Registrations section).

### **EMPLOYER(S)**

- Aramark Sports & Entertainment, LLC
- City of Germantown<sup>1</sup>
- Community Veterinary Clinics, LLC
- Home Builders Association of TN
- Lincoln Memorial University
- Medical Management International, Inc. dba Banfield Pet Hospital
- Meramec Specialty Company
- Methodist Le Bonheur Healthcare
- Next Generation Underwriters
- Patients for Fair Compensation
- Psalms
- Qsource
- Regional One Health
- Science Alliance of TN
- Society of NeuroInterventional Surgery

<sup>1</sup> City of Germantown was not required to register as an employer of a lobbyist under T.C.A. § 3-6-301(16).

### **REGISTRATION(S)**

Ms. Lacey registered as a lobbyist for fifteen employers during 2016. Based on the audit documentation, Ms. Lacey timely registered her lobbying relationship with twelve of her employers. The remaining three relationships appear to have been registered late. The details of these registrations are in the subsequent paragraphs.

Ms. Lacey works for a firm which contracts with several clients for lobbying services. The firm which employs Ms. Lacey contracted with the Medical Management International, Inc. dba Banfield Pet Hospital for lobbying services. The contract established lobby relationships requiring registration starting in late 2015. The employer then registered all lobbyists with the firm at the commencement of the 2016 year, January 6, 2016. This appears to indicate the employer considered Ms. Lacey a lobbyist from the commencement of the contract. Therefore, the audit determined Ms. Lacey was required to register within seven days of the commencement of the year, January 8, 2016. The lobbyist did not register until January 21, 2016, 13 days late.

The firm also contracted with the Society of NeuroInterventional Surgery for lobbying services. The client appears to be a new lobbyist client for the firm in 2016; the contract to support this lobbying relationship was dated in September but signed on October 3, 2016. This appears to indicate the lobbying relationship requiring registration began October 3, 2016. Therefore, the lobbyist was required to register by October 10, 2016. The lobbyist did not register until October 18, 2016, 8 days late. The lobbyist provided a statement indicating the delay was related to obtaining data from the employer for their registration.

In addition the firm contracted with Methodist Le Bonheur Healthcare for lobbying services. The oral contract has been in effect for several registration years. The lobbyist has registered under the contract during those periods including in 2015. The employer registered all lobbyists with the firm at the commencement of the 2016 year, January 6, 2016. This appears to indicate the employer considered Ms. Lacey a lobbyist from the commencement of the contract. Therefore, the audit determined Ms. Lacy was required to register within seven days of the commencement of the year, January 8, 2016. The lobbyist did not register until January 19, 2016, 11 days late.

The lobbyist provided a statement indicating she did not register by January 8, 2016, as she was not assigned duties under this contract at the beginning of the year. Although this is possible for a firm's lobbyist, there is no documentation beyond her statement to support the late assignment.

Based on review of the Bureau of Ethics and Campaign Finance's lobbyist records, Ms. Lacey paid all registration fees

### **LOBBYING AGREEMENT(S)**

Based on a review of the audit documentation provided by Ms. Lacey, she was a contracted lobbyist employed by a firm. The firm or lobbyist had written contracts or letters of understanding with each employer. The terms of the contracts appear to be within the statutes for lobbying activities including having no terms for contingency payments based on lobbying success.

### **FAMILY OR BUSINESS ARRANGEMENTS WITH PUBLIC OFFICIALS**

Ms. Lacey reported she had no business or familial relationships with persons who were officials in the legislative branch or officials in the executive branch.

### **TRAINING**

Based on review of the Bureau of Ethics and Campaign Finance's lobbyist records, Ms. Lacey completed her required lobbyist training for the 2016 registration year and paid all training fees.