

2016 Lobbyist Registration Audit of Cameron Rush

FINDING(S)

Cameron Rush failed to timely register for four of his employers (See Registrations section).

EMPLOYER(S)

- American International Group, Inc.
- Cemetery Association of TN
- CenturyLink
- Chalkable, Inc.
- Copart
- Distilled Spirits Council of the U.S.
- NICUSA, TN Division
- Obion County Chamber of Commerce
- Oracle America, Inc.
- Property Casualty Insurers ASSN.
- Questar Assessment, Inc.
- Recreational Vehicle Industry Association
- TN ASSN. for Home Care
- TN Society of Certified Public Accountants
- Verizon
- VISA, Inc.

REGISTRATION(S)

Mr. Rush registered as a lobbyist for sixteen employers during 2016. Based on the audit documentation, Mr. Rush timely registered his lobbying relationship with twelve of his employers.

Mr. Rush works for a firm which contracts with several clients for lobbying services. The firm which employs Mr. Rush contracted with the Cemetery Association of TN for lobbying services. Based on a review of the audit documentation the firm contracted with this client in prior years and Mr. Rush was registered as one of the lobbyist under the contract in 2015. Based on this data, the lobbying relationship was established with the firm prior to the commencement of 2016 and therefore firm assigned lobbyists and the employer were required to register within seven days of the commencement of the 2016 year (January 8, 2016). All of the firm's lobbyists registered on January 21, 2016 and were registered by the employer on January 24, 2016. The audit determined Mr. Rush is a continuing lobbyist under the contract, therefore; he was required to register by January 8, 2016 to be within the seven days required by statute. The lobbyist did not register until January 21, 2016, 13 days late.

Also, in late 2015 it appears the firm contracted with two new clients Chalkable, Inc. and Recreational Vehicle Industry Association for lobbying services. Both lobby relationships requiring registration were established by contracts with terms starting late 2015. Based on the contracts beginning in 2015, the firms' assigned lobbyists are required to register by January 8, 2016 to be within the seven days required by statute. The firms' assigned lobbyist all registered on January 21, 2016 for Chalkable, Inc. and on January 28, 2016 for Recreational Vehicle Industry Association. Mr. Rush's registration for Chalkable, Inc. on January 21, 2016 was 13 days late. Mr. Rush's registration for Recreational Vehicle Industry Association on January 28, 2016 was 20 days late.

Finally, during 2016 it appears the firm contracted with a new client, Questar Assessment Inc. for lobbying services. The lobby relationship requiring registration was established by a contract dated June 20, 2016 with terms starting the same day. The firms' assigned lobbyists all registered on September 23, 2016. Based on the registrations of all the firms' assigned lobbyists, it appears Mr. Rush was assigned to this client from the beginning of the lobbying relationship. Therefore, based on the contract terms Mr. Rush was required to register by June 28, 2016 to be within seven days required by statute. The lobbyist did not register until September 23, 2016, 87 day late.

Upon reviewing the draft audit report the lobbying firm provided a statement related to Questar indicating that the original contract commenced during summer and the firm and had no contact with the legislature. Thus was only providing consulting services. The statement continues to indicate on or about August 29, 2016 there was a determination the services would commence to include lobbying activity. Assuming that August 29, 2016 is the commencement of the lobbying relationship and not the June 20, 2016 date of the contract, the lobbyist would have been required to register by September 5, 2016 making the September 23 registration only 18 days late. Beyond the statement there is no other record to indicate the services were modified from the original contract.

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

LOBBYING AGREEMENT(S)

Based on a review of the audit documentation provided by Mr. Rush, he was a contracted lobbyist employed by a firm. The firm had a written contracts or letter 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

Mr. Rush reported he 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, Mr. Rush completed his required lobbyist training for the 2016 registration year and paid all training fees.