

2017 Lobbyist Registration Audit of Haley Dale

FINDING(S)

1. **Haley Dale failed to timely register for two of her employers** (See Registrations section).
2. **Haley Dale failed to maintain records to verify when a lobbying relationship commenced for two of her employers** (See Registrations section).

EMPLOYER(S)

- Airbnb, Inc.
- Amedisys, Inc.
- Bayer U.S. LLC
- CHS Professional Services Corporation
- Consumer Healthcare Products Association
- eBay
- KY/TN Section of American Water Works ASSN. KY/TN Section
- LKQ CORP
- Southern Company Gas Tennessee
- Tennessee Ambulatory Surgery Center Association
- Tennessee Charter School Center
- TN Broadband Communications Council DBA TN Fiber Optic Communities
- TN Consumer Finance ASSN.
- TN Dental Hygienists ASSN.
- TN Independent Finance ASSN.
- Uber Technologies, Inc.
- Watauga Recovery Centers, Inc.

REGISTRATION(S)

Ms. Dale registered as a lobbyist for seventeen employers during 2017. Based on the audit documentation, Ms. Dale timely registered her lobbying relationship with thirteen employers. Two of the lobbying relationships appear to have been registered late. The audit was unable to determine the timeliness of the remaining two relationships based on the lack of records provided by the lobbyist. The details of late and undeterminable registrations are in the subsequent paragraphs.

Airbnb, Inc.

Ms. Dale worked as a sub-contractor with a firm which provides lobbying services for several clients. The firm requested Ms. Dale's assistance with their lobbying contract with Airbnb, Inc. by email on January 5, 2017. The email established a lobbying relationship between Ms. Dale and Airbnb, Inc. that required registration. Therefore, the audit determined Ms. Dale was required to register within seven days of the email, January 12, 2017. The lobbyist did not register until January 16, 2017, 4 days late.

TN Consumer Finance ASSN.

The firm also had a contract with TN Consumer Finance ASSN. to provide lobbying services. The client appears to be a returning lobbyist client for the firm in 2017, as they registered the prior year. Based on the audit documentation provided it appears the firm notified

Ms. Dale of the continuing need to assist on the lobbyist agreement on January 6, 2017. Therefore, the audit determined Ms. Dale was required to register within seven days of the agreement, January 13, 2017. The lobbyist did not register until January 20, 2017, 7 days late.

KY/TN Section of American Water Works ASSN. KY/TN Section & TN Broadband Communications Council DBA TN Fiber Optic Communities

Lastly, the firm had contracts to provide lobbying services for KY/TN Section of American Water Works ASSN. KY/TN Section and TN Broadband Communications Council DBA TN Fiber Optic Communities. Per statements by Ms. Dale, she was assigned to assist with these clients due to increases in volume of work by verbal agreements, but no documentation of these agreements was maintained. Ms. Dale registered for KY/TN Section of American Water Works ASSN. KY/TN Section on February 2, 2017 and the employer registered on February 9, 2017. Relatedly, Ms. Dale and TN Broadband Communications Council DBA TN Fiber Optic Communities registered their relationship on January 26, 2017. Although the dates of registration are early in legislative session and could be due to known increases in lobbying activities as stated by the lobbyist, without confirming documentation such as an email or letter or understanding to confirm the statements of the lobbyist, the audit is unable to verify when the lobbyist relationship began and thus when the seven day requirement to register would commence.

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

LOBBYING AGREEMENT(S)

Based on a review of the audit documentation provided by Ms. Dale, she was a sub-contractor to a firm. The firm had an agreement with Ms. Dale for her services and had written contracts or letters of understanding with each employer. Based on the terms set in Ms. Dale's agreement, her services 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. Dale 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. Dale completed her required lobbyist training for the 2017 registration year and paid all training fees.