

## **2018 Lobbyist Registration Audit of Robert Gowan**

### **FINDING(S)**

1. **Robert Gowan failed to timely register for one of his employers** (See Registrations section).

### **EMPLOYER(S)**

- Coalition of Large School Systems
- Education Networks of America
- Geographic Solutions, Inc.
- LCE-Life Changing Experience Ltd.
- Rx Development Associates, Inc.
- Tennessee Music Education Association (TMEA)
- Vera Institute of Justice

### **REGISTRATION(S)**

Robert Gowan registered as a lobbyist for seven employers during 2018. Based on the audit documentation, Mr. Gowan timely registered lobbying relationships with six employers. The remaining relationship appears to have been registered late and is detailed in the subsequent paragraph.

#### **LCE-Life Changing Experience Ltd.**

Robert Gowan's firm contracts with several clients for lobbying services. The firm contracted with LCE-Life Changing Experience Ltd. for lobbying services. Based on the contract provided, it appears a lobbying relationship requiring registration was commenced on November 1, 2018. Therefore, the audit determined Mr. Gowan was required to register within seven days of the agreement, November 8, 2018. The lobbyist did not register until November 30, 2018, 22 days late.

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

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

Based on a review of the audit documentation provided by Robert Gowan, he was a contracted lobbyist. He 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**

Robert Gowan 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, Robert Gowan completed his required lobbyist training for the 2018 registration year and paid all training fees.