2019 Lobbyist Registration Audit of Nuraldeen Brifkani

FINDING(S)

1. Nuraldeen Brifkani failed to timely register for two employers.

EMPLOYER(S)

- City of Chattanooga
- Farm Credit Mid-America, FLCA/PCA/ACA
- IMMI

- MicroVote General Corporation
- Noble Education, Inc.
- Tennessee Blockchain Alliance, Inc.

REGISTRATION(S)

Nuraldeen Brifkani was an employee/associate for a firm which contracts to provide lobbying services for several clients. Nuraldeen Brifkani registered as a lobbyist for six employers during 2019. Based on the audit documentation, Nuraldeen Brifkani timely registered lobbying relationships with four employers. The remaining two relationships appear to have been registered late. The details of these registrations are in the subsequent paragraphs.

IMMI

The firm contracted with IMMI for lobbying services for 2019. The contract for 2019 appears a continuing lobbying relationship from the prior year, which would require registration by at least one member of the firm by January 8, 2019. Nuraldeen Brifkani appears to have been assigned to the client from the commencement of the 2019 registration year. Nuraldeen Brifkani did not register until January 15, 2019, 7 days late.

Noble Education, Inc.

The firm contracted with Noble Education, Inc for lobbying services for 2019. The contract for 2019 appears a continuing lobbying relationship from the prior year, which would require registration by at least one member of the firm by January 8, 2019. Nuraldeen Brifkani appears to have been assigned to the client from the commencement of the 2019 registration year. Nuraldeen Brifkani did not register until February 25, 2019, 48 days late.

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

LOBBYING AGREEMENT(S)

Based on a review of the audit documentation provided, Nuraldeen Brifkani was a contracted lobbyist employed by a firm. The firm 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

Nuraldeen Brifkani reported 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, Nuraldeen Brifkani completed the required lobbyist training for the 2019 registration year and paid all training fees.