

## **2020 Lobbyist Registration Audit of Stewart Clifton**

### **FINDING(S)**

1. **Stewart Clifton failed to timely register for six employers.**
2. **Stewart Clifton failed to complete the required lobbyist training.**

### **EMPLOYER(S)**

- Alzheimer's Tennessee Inc.
- League of Women Voters of TN
- NASW, Tennessee Chapter
- Tennessee Conservation Voters
- TN Alliance for Legal Services
- TN Assn. for Children's Early Education

### **REGISTRATION(S)**

Stewart Clifton contracts to provide lobbying services for several clients. Stewart Clifton registered as a lobbyist for six employers during 2020. Based on the audit documentation, Stewart Clifton failed to timely register the lobbying relationships with all six employers. The details of these registrations are in the subsequent paragraphs.

#### **Alzheimer's Tennessee Inc.**

Stewart Clifton contracted with the Alzheimer's Tennessee Inc. for lobbying services for 2020. The provided records indicate the lobbying relationship for the 2020 registration year commences on January 1, 2020, which would require registration by January 8, 2020 to be within seven days as required by statute. The lobbyist did not register until January 22, 2020, 14 days late.

#### **League of Women Voters of TN**

Stewart Clifton contracted with the League of Women Voters of TN for lobbying services for 2020. The client was also a client in 2019. The contract that includes 2020 appears to establish a continuing lobbying relationship from the prior year, which would require registration by January 8, 2020 to be within seven days as required by statute. The lobbyist did not register until January 10, 2020, 2 days late.

#### **NASW, Tennessee Chapter**

Stewart Clifton contracted with NASW, Tennessee Chapter for lobbying services for 2020. The client was also a client in 2019. The contract that includes 2020 appears to establish a continuing lobbying relationship from the prior year, which would require registration by January 8, 2020 to be within seven days as required by statute. The lobbyist did not register until January 10, 2020, 2 days late.

### **Tennessee Conservation Voters**

Stewart Clifton contracted with the Tennessee Conservation Voters for lobbying services for 2020. The client was also a client in 2019. The contract that includes 2020 appears to establish a lobbying relationship commencing on January 1, 2020 and thus continuing the lobbying relationship from the prior year. The relationship would require registration by January 8, 2020 to be within seven days as required by statute. The lobbyist did not register until January 10, 2020, 2 days late.

### **TN Alliance for Legal Services**

Stewart Clifton contracted with TN Alliance for Legal Services for lobbying services for 2020. The client was also a client in 2019. The contract from 2020 appears to establish a lobbying relationship from the commencement of the year making the registration similar to a continuing contract, the contracted relationship would require registration by January 8, 2020 to be within seven days as required by statute. The lobbyist did not register until January 10, 2020, 2 days late.

### **TN Assn. for Children's Early Education**

Stewart Clifton contracted with the TN Assn. for Children's Early Education for lobbying services for 2020. The client was also a client in 2019. The agreement appears to be a verbal agreement that continued prior services from 2019, which would require registration by January 8, 2020 to be within seven days as required by statute. The lobbyist did not register until January 10, 2020, two days late.

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

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

Based on a review of the audit documentation provided, Stewart Clifton was a contract lobbyist who had written contracts or letters of understanding with each employer except TN Assn. for Children's Early Education which appears to have a verbal agreement that was confirmed with the employer. The terms of the contracts and verbal agreement 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**

Stewart Clifton reported no business or familial relationships with persons who were officials in the legislative branch or officials in the executive branch.

## **TRAINING**

According to the Bureau of Ethics and Campaign Finance's lobbyist records, Stewart Clifton did not complete required lobbyist training for the 2020 registration year. T.C.A. § 3-6-114(b) requires each registered lobbyist to complete an annual training course. When a lobbyist completes the training online, the system records the training on the web-based system. If the lobbyist attends the legislative ethics training, their name is recorded at the training event and then administratively entered into the system records. Based on the review of the system records, Stewart Clifton did not complete the training online or by attendance during 2020. The Bureau of Ethics and Campaign Finance's lobbyist records indicate Stewart Clifton paid all training fees.