

## **2020 Lobbyist Registration Audit of Len Engel**

### **FINDING(S)**

- 1. Len Engel failed to maintain and provide sufficient support to determine the timeliness of the registration.**

### **EMPLOYER(S)**

- Community Resources for Justice, Inc.

### **REGISTRATION(S)**

Len Engel registered as a lobbyist for one employer during 2020. Based on the documentation provided by the lobbyist the audit cannot determine the timeliness of the lobbyist registration. Len Engel is the Director of Policy and Campaigns for Community Resources for Justice Inc. and was hired in 2005. The lobbyist and employer registered on February 27, 2020, indicating a need to lobby in Tennessee was identified. The lobbyist was unable to support when that determination was made; however, the following comments were provided on his behalf by Community Resources for Justice, Inc.,

“The timing of the registration is based on a number of internal conversations that review a number of factors including, our tracking of conversations about the actual commencement of the legislative session, and the progression of conversations of particular types of criminal justice policy legislation in the state house. The registration is submitted in advance of any lobbying effort and anticipates a forthcoming need.”

No support for such internal communication was provided (IE internal email) As such Len Engel’s registration could be timely for 2020 or, if the decision was made prior to registration, it could be late. If the event requiring registration occurred on or prior to January 1, 2020, then Len Engel had to register by January 8, 2020, to be within seven days required by statute for the 2020 lobbyist registration year. As noted above, the lobbyist did not register until February 27, 2020, which would be 50 days late from January 8, 2020.

Based on review of the Bureau of Ethics and Campaign Finance’s lobbyist records, Len Engel paid all registration fees.

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

Based on a review of the audit documentation provided, Len Engel was a direct employee of the employer. The employer had no employment contract with the lobbyist employee. However, per statements of the lobbyist, the employer, and review of the job description, it appears the terms of employment were within the statutes for lobbying activities, including having no terms for contingency payments based on lobbying success.

## **FAMILY OR BUSINESS ARRANGEMENTS WITH PUBLIC OFFICIALS**

Len Engel 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, Len Engel completed required lobbyist training for the 2020 registration year and paid all training fees.