

# 2013 Lobbyist Registration Audit of Warren Broemel

## **FINDINGS**

1. Mr. Warren Broemel failed to timely register as a lobbyist for two of his employers (See Registrations section).

## **EMPLOYER**

- ACE American Insurance Company
- Allstate Insurance Company
- America's Health Insurance Plans
- American Insurance Association
- TN Assn. of Health Underwriters
- United Service Automobile Association

## **REGISTRATIONS**

Mr. Warren Broemel registered as a lobbyist for six employers during 2013. Based on the audit documentation, Mr. Broemel timely registered his lobbying relationship with four of his employers.

At the start of 2013, Mr. Broemel was a partner in a firm who contracted with the Allstate Insurance Company and TN Assn of Health Underwriters for lobbying services for 2013. The firm also contracted with both employers in 2012. As these employers had a continuing relationship with Mr. Broemel, he was required to register by January 8, 2013, to meet the seven (7) day registration requirement. Mr. Broemel registered on February 13, 2013, 36 days late for Allstate Insurance Company. He registered on February 25, 2013, 48 days late for TN Assn of Health Underwriters.

## **LOBBYING AGREEMENTS**

Based on a review of the audit documentation provided by Mr. Broemel, he was a contracted lobbyist during 2013. He worked for two firms during the lobbying year. The lobbying relationships with each employer were established through the firms where he was a partner or senior counsel. Each firm had written agreements with each employer. Based on these agreements and the lobbyists employment status with the firms it appears the terms of each lobbying relationship are within the statutes for lobbying activities including having no terms for contingency payments based on lobbying success.

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

Mr. Broemel reported he had no business or familial relationships with persons who were officials in the legislative branch or officials in the executive branch.

## **TRAINING & FEES**

Based on review of the Bureau of Ethics and Campaign Finance's lobbyist records, Mr. Broemel completed his required lobbyist training for the 2013 registration year and paid all registration fees.