

2014 Lobbyist Registration Audit of Matthew King

FINDING

Mr. Matthew King failed to timely register as a lobbyist for ten of his employers (see Registrations section).

EMPLOYER

- Afton Chemical
- BellSouth Telecommunications, Inc.
d/b/a AT&T Tennessee
- BrightStar Franchising
- Next Generation Underwriters
- Oasis Legal Finance
- Rocketship Education
- Stonehenge Capital Company, LLC
- TN Assn for Justice
- TN Press Assn, Inc.
- Tennessee Society of Pathologists
- Tennessee Trail Judges Association
- Ticket Software LLC DBA
Ticketnetwork, Inc.
- United Healthcare Services, Inc.

REGISTRATIONS

Mr. King registered as a lobbyist for thirteen employers during 2014. Based on the audit documentation, Mr. King timely registered his lobbying relationship for three of his employers. The Bureau of Ethics and Campaign Finance's lobbyist records indicate Mr. King and paid all his registration fees.

Mr. King contracted with seven clients for whom he registered as a lobbyist. The date of the agreement or the terms of the contract for the seven clients were either prior to or commenced on January 1, 2014. As a result the lobbyist was required to register within seven days of the start of the year which is January 8, 2014. Mr. King did not register until after January 8, 2014 for all seven clients. Listed below are the clients for whom the candidate registered along with the registration date and the number of days the registration was late:

Client	Registration date	Days Late
Afton Chemical	January 20, 2014	12 days
AT&T Tennessee	January 20, 2014	12 days
Stonehenge Capital Co. LLC	January 20, 2014	12 days
TN Assn for Justice	January 20, 2014	12 days
Tennessee Society of Pathologists	January 20, 2014	12 days
Tennessee Trail Judge Association	January 20, 2014	12 days
United Healthcare Services Inc.	January 20, 2014	12 days

During 2014, Mr. King contracted with BrightStar Franchising for lobbying services. The terms of the contract were from June 23, 2014 to October 31, 2014. Based on these terms the audit determined the lobbyist should have registered by June 30, 2014, to meet the seven day registration requirement. Mr. King registered on July 14, 2014, which was 14 days late.

In 2014, Mr. King contracted with the TN Press Assn, Inc. for lobbying services for the first time. The terms of the contract were from January 1, 2014 to December 31, 2014. The contract was dated January 1, 2014, however, based on emails provided by the lobbyist and the employer, the contract was not finalized until a later date. Bureau records indicate the employer registered the lobbying relationship on January 15, 2014, still prior to the date the contract was finalized per the provided emails. The actual date the contract was finalized could not be determined by audit as there is no signature date on the contract. As a result, the audit determined that the employer registration on January 15 was sufficient to indicate that a lobbyist relationship requiring registration occurred. Therefore, the audit determined the lobbyist should have registered by January 22, 2014, to meet the seven day registration requirement. Mr. King registered on February 4, 2014, which was 13 days late.

At the commencement of 2014, Mr. King contracted with Ticket Software LLC DBA Ticketnetwork, Inc. for lobbying services. He was also a registered lobbyist for this employer in 2013. The 2014 contract appears to be a new contract and not a renewal of the prior lobbyist relationship. The terms of the contract were from January 1, 2014 to December 31, 2014. In addition the contract was dated January 21, 2014. Based on the date of the contract and the fact that this appears to be a new contract establishing the lobbyist relationship, the audit determined the lobbyist had an agreement requiring registration as of January 21, 2014. Therefore, the audit determined the lobbyist should have registered by January 28, 2014, to meet the seven day registration requirement. Mr. King registered on February 4, 2014, which was 7 days late.

LOBBYING AGREEMENTS

Based on a review of the audit documentation provided by Mr. King, he was a contracted lobbyist. He had a 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

Originally, Mr. King reported he had no business or familial relationships with persons who were officials in the legislative branch or officials in the executive branch. He then amended his registration for all employers on September 30, 2014 to disclose his relationship to Shelli King, Communications Director for the Tennessee Department of the Treasury. The amendment properly discloses his family relationships as it became reportable.

TRAINING

The Bureau of Ethics and Campaign Finance's lobbyist records indicate Mr. King completed his required lobbyist training for the 2014 registration year and paid all training fees.