

2015 Lobbyist Registration Audit of Megan Lane

FINDING(S)

1. **Ms. Megan Lane failed to timely register for two of her employers.** (See Registrations section).
2. **Ms. Megan Lane failed to timely disclose family relationships with officials.** (See Family or Business arrangements with Public Officials section)

EMPLOYER(S)

- AEP / Kingsport Power
- Alcoa, Inc.
- Centurion, LLC
- Corrections Corp. of America
- Eastman Chemical Co.
- Harpeth Financial Services, LLC
- HFR, Inc.
- Humana Inc.
- International Paper
- Midtown Consulting Group
- Norfolk Southern Corp.
- Outdoor Advertising of TN
- Piedmont Natural Gas
- Quest Diagnostics Incorporated
- RAI Services Company
- Rave Mobile Safety
- Tennessee Alliance For Fair Airport User Fees
- TN Fire Services Coalition
- TN Performing Arts Center

REGISTRATION(S)

Ms. Lane registered as a lobbyist for nineteen employers during 2015. Based on the audit documentation, Ms. Lane timely registered her lobbying relationship with seventeen of her employers. She registered late for the two employers listed below;

Ms. Lane is an employee for a Lobbying firm which contracts with Midtown Consulting Group for lobbying services. Based on a review of the audit documentation the firm contracted with this client in prior years, however, Ms. Lane was not registered as one of the lobbyists under the contract. Audit documentation and statements provided indicate Midtown Consulting Group was not registered at the beginning of the 2015 lobbyist year but re-negotiated with the firm for additional lobbying services in the later part of the year. The contract terms were to commence on August 1, 2015. Based on the contract the lobbying relationship was established with the firm commencing on August 1, 2015 and the firm assigned lobbyists and the employer were required to register by August 8, 2015. Based on the employer's registration, they registered all lobbyists, including Ms. Lane with the firm on the same day. Therefore the audit determined, Ms. Lane was considered to be a lobbyist under the contract from the inception of the lobbying relationship, therefore; she was required to register by August 8, 2015. The lobbyist did not register until October 15, 2015, 68 days late.

The firm which employs Ms. Lane also contracts with RAI Services Company for lobbying services. Based on a review of the audit documentation the firm contracted with this client in prior years and Ms. Lane was registered as one of the lobbyist under the contract in 2014. Based on this data, the lobbying relationship was established with the firm prior to the commencement of 2015 and therefore firm assigned lobbyists and the employer had to register

within seven days of the commencement of the 2015 year (January 8, 2015). Based on the employer's registration, they registered five lobbyists including Ms. Lane with the firm on the same day, December 18, 2014. No lobbyist with the firm was registered later for the 2015 registration year. This indicated the employer considered Ms. Lane as a continuing lobbyist from 2014 to 2015. Therefore the audit determined Ms. Lane was considered a continuing lobbyist under the contract, therefore; she also had to register by January 8, 2015 to be within seven days required by statute. The lobbyist did not register until January 22, 2015, 14 days late.

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

LOBBYING AGREEMENT(S)

Based on a review of the audit documentation provided by Ms. Lane, she was a contracted lobbyist employed by a firm. She was a contract lobbyist under those contracts for the entire employers listed above except for the TN Performing Arts Center (See next paragraph). The firm provided written contracts or letters of understanding for ten employers showing 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. The firm also provided a document showing notice for changes for a contract for one employer but the changes did not include sections related to payments, but the firm appears to be using similar contracts for most clients. For the remaining eight the firm provided no records, but the firm (JohnsonPoss) provided statements that Ms. Lane as their employee has not been paid a contingency based on lobbying success. The audit is therefore only relying on the firm and lobbyists statements for eight of the nineteen employers that contingency payments were not made to Ms. Lane.

Based on a review of the statements of the employer of the lobbyist, Ms. Lane was a volunteer lobbyist for the TN Performing Arts Center. The employer had no employment contract with the lobbyist employee and was paid no compensation; therefore, the volunteer lobbyist received no contingency payments based on lobbying success.

FAMILY OR BUSINESS ARRANGEMENTS WITH PUBLIC OFFICIALS

Ms. Lane reported she had no business or familial relationships with persons who were officials in the legislative branch or officials in the executive branch in 2015. However, in 2016, she amended her disclosure to report Justin Lane, Marketing Director at the Tennessee Department of Economic and Community Development. A review indicated Mr. Lane was working as an employee of this executive department in 2015. Therefore he should have been listed on the lobbyist 2015 registrations.

TRAINING

Based on review of the Bureau of Ethics and Campaign Finance's lobbyist records, Ms. Lane completed her required lobbyist training for the 2015 registration year and paid all training fees.