

2009 Lobbyist Registration Audit of Leslie Hafner

FINDINGS

Ms. Hafner failed to timely register as a lobbyist for twelve employers (See Registrations section).

EMPLOYER

- American Express Co.
- American Petroleum Institute
- Brown-Forman
- Coventry-Health Care Inc.
- Dell Inc
- Dialysis Clinic, Inc.
- Doral Dental of Tennessee, LLC
- Gaylord Entertainment Co.
- Kaplan Higher Education Corp.
- LaserCraft, Inc.
- Medtronic Neuromodulation
- Mountain States Health Alliance
- Studsvik Inc.
- Tennessee Bankers Association
- Tennessee Electric Cooperative Association
- United Healthcare
- United Healthcare Services Inc

REGISTRATIONS

Ms. Hafner registered as a lobbyist for seventeen employers during 2009. Ms. Hafner failed to timely register for twelve of her employers.

Ms. Hafner registered late for the following ten employers with which she had a continuing lobbying agreement from 2008 and therefore was required to register for them for 2009 by December 22, 2008:

- American Express Company on January 8, 2009, 17 days late.
- Brown-Forman on January 8, 2009, 17 days late. (Ms. Hafner, also register more than 7 days after the employer of the lobbyist registered.)
- Coventry HealthCare Inc. on January 8, 2009, 17 days late.
- Dell Incorporated on January 8, 2009, 17 days late.
- Doral Dental of Tennessee, LLC on January 8, 2009, 17 days late. (Ms. Hafner, also register more than 7 days after the employer of the lobbyist registered.)
- Gaylord Entertainment Company on January 8, 2009, 17 days late.
- Kaplan Higher Education Corporation on January 8, 2009, 17 days late.
- Mountain States Health Alliance on January 8, 2009, 17 days late.
- Studsvik Inc on January 8, 2009, 17 days late. (Ms. Hafner, also register more than 7 days after the employer of the lobbyist registered.)
- TN Electric Cooperative Association on January 8, 2009, 17 days late.

The lobbying relationship with Dialysis Clinic Inc. was a written agreement dated January 12, 2009. The agreement had a term start date of January 13, 2009. Based on the agreement the trigger date for registration was determined to be January 12, 2009. Therefore, the

lobbyist was required to register by January 19, 2009. Ms. Hafner, however, registered on February 23, 2009, which is 35 days late.

The lobbying relationship with United Healthcare was a written agreement. The agreement had an effective date of February 1, 2009. Based on the agreement the trigger date for registration was determined to be February 1, 2009. Therefore, the lobbyist was required to register by February 8, 2009. Ms. Hafner registered on February 13, 2009, which is 5 days late.

LOBBYING AGREEMENTS

Based on a review of the audit documentation provided by Ms. Hafner, she was an employee and a principal of the firms that had written agreements with each employer. The terms of each agreement were reviewed and 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

Ms. Hafner reported she had no business or family relationships with persons who are 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, Ms. Hafner completed her required lobbyist training for the 2009 registration year and paid all associated registration and training fees.

IN-STATE EVENTS

Ms. Hafner did not participate in paying the costs of any in-state events.