

## **2019 Lobbyist Registration Audit of Tina Gerardi**

### **FINDING(S)**

- 1. Tina Gerardi failed to pay the established training fee.**

### **EMPLOYER(S)**

- TN Nurses Assn.

### **REGISTRATION(S)**

Tina Gerardi registered as a lobbyist for one employer during 2019. Based on the audit documentation, Tina Gerardi timely registered the lobbying relationship and paid all registration fees.

### **LOBBYING AGREEMENTS**

Based on a review of the audit documentation provided, Tina Gerardi was a direct employee of the employer. The employer had an employment contract with the lobbyist employee. 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**

Tina Gerardi reported no business or familial relationships with persons who were officials in the legislative branch or officials in the executive branch.

### **TRAINING**

According to the Bureau of Ethics and Campaign Finance's lobbyist records, Tina Gerardi completed the required lobbyist training for the 2019 registration year but failed to pay the established training fee. T.C.A. § 3-6-114(b) requires each registered lobbyist to complete an annual training course. When a lobbyist completes the training online, the system records the training on the web-based system. If the lobbyist attends the legislative ethics training, their name is recorded at the training event and then administratively entered into the system records. The related statute also allows the Tennessee Ethics Commission to assess a training fee. The current fee is \$40. The Bureau of Ethics and Campaign Finance's records indicate Tina Gerardi did not pay the training fees.