

## **2022 Lobbyist Registration Audit of Olivia Imhoff**

### **FINDING(S)**

1. Olivia Imhoff failed to register as a lobbyist for one employer timely.

### **EMPLOYER(S)**

- IDEMIA North America

### **REGISTRATION(S)**

Olivia Imhoff registered as a lobbyist for one employer during 2022. Per the records provided by the lobbyist's employer, the lobbyist is an in-house lobbyist for IDEMIA North America with the job title "Manager of Government Relations". This employment began on January 3, 2022. Although part of the lobbyist's duties included lobbying in Tennessee, they were not the only duties and not specifically the duties for which the lobbyist was hired.

The lobbyist's employer provided documentation indicating the need for registration was identified "mid-Q1". The lobbyist's employer registered on February 15, 2022, and the lobbyist later registered on March 10, 2022. Based on the information provided, it appears the lobbyist and employer had a relationship that required registration when the employer registered on February 15, 2022; therefore, the lobbyist had seven days, or until February 22, 2022, to register. The lobbyist failed to register as a lobbyist timely; the registration was 16 days late.

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

### **LOBBYING AGREEMENT(S)**

Based on a review of the audit documentation provided, Olivia Imhoff was a direct employee of the employer. The employer had no employment contract with the lobbyist employee. However, per statements of the lobbyist and a review of the job description, it appears the terms of employment were within the statutes for lobbying activities, including having no terms for contingency payments based on lobbying success.

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

Olivia Imhoff 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, Olivia Imhoff completed the required lobbyist training for the 2022 registration year and paid all training fees.