2015 Lobbyist Registration Audit of Meagan Frazier

FINDING(S)

Ms. Meagan Frazier failed to timely register as a lobbyist for two of her employers (See Registrations section).

EMPLOYER(S)

- Alexian Brothers
- Celgene Corporation
- Community Rehabilitation Agencies of Tennessee
- HCA The Healthcare Company
- Ingram Industries, Inc.
- Johnson and Johnson
- Leading Age Tennessee
- Tennessee Hospice Organization
- Tiger Haven
- TN Assn of Air Carrier Airports
- TN Assn of Housing & Redevelopment Authorities

- TN Assn of Mental Health Organization
- TN Community Organizations (TNCO)
- TN Hospital Assn
- TN Physical Therapy Assn
- TN Primary Care Assn
- TN Psychiatric Assn
- TN Veterinary Medical Assn
- Truven Health Analytics
- Women's Political Collaborative of TN
- YMCA of Middle Tennessee

REGISTRATION(S)

Ms. Frazier registered as a lobbyist for twenty-one employers during 2015. Based on the audit documentation, Ms. Frazier timely registered her lobbying relationship with nineteen of her employers. Based on review of the Bureau of Ethics and Campaign Finance's lobbyist records, Ms. Frazier paid all registration fees. The finding on the remaining two registrations is detailed below.

Ms. Frazier works for a firm which contracts with several clients for lobbying services. During 2015 it appears the firm contracted with a new client, Celgene Corporation, for lobbying services. The lobbying relationship requiring registration was established by a contract with terms starting on September 1, 2015. Based on the contract, it appears Ms. Frazier was assigned to this client from the beginning of the lobbying relationship as she signed as principal on the contract. Based on the contract terms Ms. Frazier had to register by September 8, 2015 to be within seven days required by statute. The lobbyist did not register until September 9, 2015, 1 day late.

Also, during 2015 it appears the firm contracted with a new client, Community Rehabilitation Agencies of Tennessee, for lobbying services. The lobbying relationship requiring registration was established by a contract with terms starting on January 15, 2015. Based on the registrations of lobbyists related to this firm and client, it appears Ms. Frazier was assigned to this client from the beginning of the lobbying relationship. Therefore, based on the contract terms Ms. Frazier had to register by January 22, 2015 to be within seven days required by statute. The lobbyist did not register until January 23, 2015, 1 day late.

LOBBYING AGREEMENT(S)

Based on a review of the audit documentation provided by Ms. Frazier, she was a contracted lobbyist employed by a firm. The firm had a written contract or letter 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

Ms. Frazier reported she had no business or familial relationships with persons who were officials in the legislative branch or officials in the executive branch.

TRAINING

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