2011 Lobbyist Registration Audit of Josh Thomas

FINDINGS

Mr. Josh Thomas failed to timely register as a lobbyist for one employer (See Registrations section).

EMPLOYER

- Aramark Correctional Services, LLC
- The Pew Charitable Trusts

REGISTRATIONS

Mr. Thomas registered as a lobbyist for two employers during 2011. Mr. Thomas was a lobbyist with a firm. The firm contracts for lobbying services with each of the registered employers. Based on the audit documentation, Mr. Thomas timely registered his lobbying relationship with The Pew Charitable Trusts. The audit documentation also indicated Josh Thomas failed to timely register for Aramark Correctional Services, LLC. The lobbyist provided a contract to support the lobbying relationship. The contract was dated April 8, 2011, however, the terms of the contract stated they commenced on March 1, 2011. The audit determined a lobbyist relationship requiring registration commenced by March 1, 2011. As a result, Mr. Thomas was required to register by March 8, 2011 to meet the seven (7) day registration requirement. The lobbyist did not register until April 3, 2011, 26 days late.

LOBBYING AGREEMENTS

Based on a review of the documentation provided by the firm and Mr. Thomas, the firm has a written contract with each client. The terms of each contract 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

Mr. Thomas reported he had no business or familial relationships with persons who were 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, Mr. Thomas completed his required lobbyist training for the 2011 registration year and paid all registration fees.