

Analysis of clients of registered lobbyists with repeated violations of annual reporting requirements.

There are 4 companies/organizations that had registered lobbyists who failed to file a lobbying and expense report in multiple years between 2021 and 2024.

- Verizon (6 instances of non-compliance among their registered lobbyists)
- Flock Safety (3 instances of non-compliance among their registered lobbyists)
- Nashville Area Chamber of Commerce (3 instances of non-compliance among their registered lobbyists)
- Meharry Medical College (2 instances of non-compliance among their registered lobbyists)

Verizon had three registered lobbyists with a total of six instances of non-compliance with the reporting requirements from the years 2021 to 2023 (three in 2021, two in 2022, and one in 2023). In 2024, Verizon had two registered lobbyists, both of whom were compliant with the reporting requirements.

Flock Safety had two registered lobbyists with a total of three instances of non-compliance with the reporting requirements from the years 2021 to 2022 (two in 2021 and one in 2022). Flock Safety did not have any registered lobbyists in 2023. In 2024, Flock Safety had two registered lobbyists, both of whom were compliant with the reporting requirements.

The Nashville Area Chamber of Commerce had three registered lobbyists with a total of three instances of non-compliance with the reporting requirements from the years 2022 to 2024 (one in 2022 and two in 2024). In 2024, two of the registered lobbyists for this organization had left their positions within the organization and as such may not have had access to their email address that was initially used for their registration and therefore wouldn't have received the notices and reminders regarding the reporting requirements and deadlines.

Meharry Medical College had one registered lobbyist with a total of two instances of non-compliance with the reporting requirements from the years 2021 to 2022 (one in each year). Meharry Medical College did not have any registered lobbyists in 2023 or 2024.

There were no other lobbyists or clients of lobbyists that appeared in more than one year of the non-compliance reporting.

In all but one of the instances described above, the lobbyists would not have been permitted to register for the subsequent year under the newly adopted Lobbyist Code. Under the new law, those lobbyists would not have been eligible to register (or would have had their existing registration revoked) and would have required a hearing before the Board of Ethical Conduct to permit their registrations (after completing the delinquent reporting and paying the late fees).

There is one instance of a client having a lobbyist that failed to file a report and subsequently employing different lobbyists the following year. Eric Mann was a registered lobbyist for Verizon in 2023 and did not file the annual reporting for that year. In 2024, John Burkhardt and Jason Kozora were registered lobbyist for Verizon and both lobbyists did submit their annual reporting forms timely. This does not appear to be a situation where the client was attempting to circumvent the annual reporting requirements, rather a failure of an individual lobbyist to comply with the reporting requirements.

Based on this analysis, it's the opinion of the Metropolitan Clerk's office that the Lobbyist Code as updated in 2024 adequately prevents the risks of repeated reporting violations by a lobbyist. As the Board has pointed out, there is still a potential risk of a client utilizing different lobbyists each year to circumvent the reporting requirements, but it does not appear that this has happened to this point.

The lists of lobbyists that failed to file reports from 2021 to 2024 are included on the following pages:

2021 Annual Lobbying and Expense Reports - Not Received

First Name	Last Name	Client(s)
Nadira	Freeman	Oracle Corp.
Robert	Gowan	Flock Safety
Dan L	Haskell	Hospitality TN; TN Assoc. of Broadcasters
Sheleah	Harris	Verizon
Kenny	Hayes	International Union of Painters & Allied Trades DC 91
Peter	Heidenreich	Greater Nashville Realtors; Nashville Convention & Visitors Corp.
Anthony	Johnson	Verizon
Thomas H	Lee	Meharry Medical College
James A	Macke	Comcast
Eric	Mann	Verizon
Amanda	Martin	Lipscomb University
Sean	McGuire	Nashville Convention & Visitors Corp.
Elizabeth	Millsaps	Flock Safety

2022 Annual Lobbying and Expense Reports - Late/Not Received

First Name	Last Name	Client(s)
JEANETTE	BARKER	Nashville Downtown Partnership
CLAYTON	CROWNOVER	Associated Builders and Contractors
MARCILLE	DURHAM	Outfront Media
LEANNE	DURM-MINOUX	American Heart Association
SHELEAH	HARRIS	Verizon
SHEILA	HAYS	Kent Burgess and Billie Burgess Trust
ANTHONY	JOHNSON	Verizon
GARRETT	JOHNSON	Outfront Media
THOMAS H	LEE	Meharry Medical College
GERALD	MCCORMICK	Outfront Media
ELIZABETH	MILLSAPS	Flock Safety
BENJAMIN	SIMPSON III	Nashville Area Chamber of Commerce
ALAN	THOMPSON	Cypressbrook Company
JOHN	TRIGGS	MFP Baseball Club, LLC

2023 Annual Lobbying and Expense Reports - Late/Not Received

First Name	Last Name	Client(s)
RACHEL	BHALLA	Everytown For Gun Safety Action Fund
CLARENCE	DUNCAN JR.	Nashville Soccer Holdings; Skinny Labs Inc.; Waste Management
KIMBERLY	FAYE	Bristol Motors Speedway; Tennessee Football Inc; Tow Pro Services
MONCHIERE	HOLMES-JONES	Destination Culture
ERIC	MANN	Verizon
SAUL	SOLOMON	Kenneth Byrd
TIMOTHY	WILCOX	Skinny Labs Inc.

2024 Annual Lobbying and Expense Reports - Not Received

First Name	Last Name	Client(s)	Notes
BLAKE	BARS	RLCL ACQUISITION, LLC DBA GRAY LINE OF TENNESSEE	
CHRISTINE	BRADLEY	VANDERBILT UNIVERSITY MEDICAL CENTER	
EMILY	LAMB	OLD TOWN TROLLEY TOURS OF NASHVILLE	
VICTORIA	PAYNE	NASHVILLE AREA CHAMBER OF COMMERCE	Withdrawn 7/29/24
RALPH	SCHULZ	NASHVILLE AREA CHAMBER OF COMMERCE	Retired in 2024
DANNY	YATES	NASHVILLE FIRE FIGHTERS ASSOC. IAFF LOCAL 140	