

M I C H I G A N D E P A R T M E N T O F S T A T E

RICHARD H. AUSTIN

SECRETARY OF STATE

STATE TREASURY BUILDING



6-84-LD

LANSING

MICHIGAN 48918

April 24, 1984

Donald J. Pizzimenti
Vice President-Community
and Governmental Affairs
Detroit Edison
2000 Second Avenue
Detroit, Michigan

Dear Mr. Pizzimenti:

This is in response to your request for a declaratory ruling regarding the applicability of the lobby act (the "Act"), 1978 PA 472, to Detroit Edison's support of charitable organizations.

You indicate Detroit Edison Company ("Edison") is registered as a lobbyist. Edison encourages its employees to donate personal services to charitable organizations in the community and permits them to work for the charitable organizations on company time. Occasionally, Edison employees will lobby on behalf of the charitable organizations resulting in Edison paying employee wages for lobbying. Your question, edited to specifically apply to Edison, is:

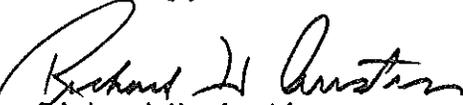
"When an employee of Edison, a registered lobbyist, is also a member of a 501(c)(3) charitable organization and lobbies on behalf of the 501(c)(3) organization on Edison's time, but such lobbying does not result in any direct financial benefit to Edison's business, is that lobbying activity exempt from the requirements of the Act?"

Attached is a February 3, 1984, letter to Mr. Joseph P. Bianco, Jr., which addresses your question. To summarize that answer, Edison is not required to report the employee's wages, cost of support staff, copying or postage costs, etc. under the facts you have provided. However, if Edison reimburses an employee for purchasing food or beverage for a public official, that expense must be reported regardless of the reason the food or beverage was purchased.

Donald J. Pizzimenti
Page 2

This response constitutes a declaratory ruling relating to the specific facts and the question you have presented.

Sincerely,


Richard H. Austin
Secretary of State

RHA/cw

Enc.