

Re: Request for Declaratory Ruling and/or Interpretive Statement

Fracassi, Adam (MDOS)

Sun 1/20/2019 10:35 AM

To: Fracassi, Adam (MDOS) <FracassiA@michigan.gov>;

From: Tim Greimel <tgreimel@miafscme.org>

Sent: Friday, January 18, 2019 5:04:25 PM

To: SOS, Disclosure

Cc: Lovegrove, Amy (MDOS); Martin, Michele (MDOS); timgreimel@gmail.com

Subject: Request for Declaratory Ruling and/or Interpretive Statement

I am respectfully requesting a declaratory ruling and/or interpretive statement from the Secretary of State.

I have been hired as the legislative director for AFSCME Council 25, which is a registered lobbyist in Michigan. Upon being hired by AFSCME Council 25, I chose to become a member of AFSCME (specifically of AFSCME Local 411).

I met with Amy Lovegrove, a Departmental Analyst at the Secretary of State, today. She concluded that I am exempt, under MCL 4.415(7)(d), from the definitions of "lobbyist" and "lobbyist agent" under MCL 4.415 because I am a "member of a lobbyist [AFSCME Council 25]" where the "lobbyist [AFSCME Council 25] is a membership organization or association."

I am hoping that you can issue a declaratory ruling and/or interpretive statement as to whether or not I am, in fact, exempt under MCL 4.415(7)(d) from the definitions of "lobbyist" and "lobbyist agent" under MCL 4.415.

Thank you in advance for your insight and guidance,

Tim Greimel
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