

## MICHIGAN DEPARTMENT OF STATE

RICHARD H. AUSTIN • SECRETARY OF STATE

STATE TREASURY BUILDING

LANSING  
MICHIGAN 48918

July 17, 1990

Joan E. Wilson, Treasurer  
Ronald C. Wilson Campaign Committee  
P.O. Box 266  
Scottville, Michigan 49454

Dear Ms. Wilson:

This is in response to your request for an exemption from the identification requirements of section 47 of the Campaign Finance Act, 1976 PA 388, as amended.

Section 47 of the Act (MCL 169.247) states, in pertinent part:

"Sec. 47. (1) A billboard, placard, poster, pamphlet, or other printed matter having reference to an election, a candidate, or ballot question, shall bear upon it the name and address of the person paying for the matter."

Rule 36(2) of the administrative rules promulgated to implement the Act provides the identification statement must include the words "Paid for by" followed by the name and complete address of the payor. However, section 47(3) of the Act authorizes the Secretary of State to exempt certain items if their size makes it unreasonable to add an identification statement.

You have requested an exemption for a 2" x 6" paper bookmark. One side of the bookmark carries a patriotic slogan and pictures of the American flag and various institutions in Washington, D.C. On the reverse side is the message "Elect Ron Wilson 51st Circuit Court Judge" and, at the top, a 6" ruler.

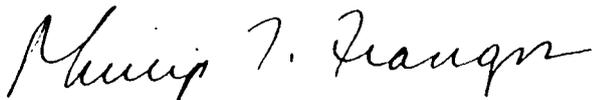
The Department has previously determined that it would be unreasonable to require an identification statement on a 12" wooden ruler. On the other hand, in a letter to

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Senator David S. Holmes, Jr., dated March 24, 1978, the Department indicated that a fund raiser ticket measuring 2-1/2" x 6-1/2" was not excluded from the requirements of section 47.

Although the bookmark you propose includes a 6" ruler, it more closely approximates a fund raiser ticket in both size and material. In addition, the sample bookmark you have provided contains ample space for the identification statement required by the Act. Therefore, the Department has determined that a 2" x 6" paper bookmark is not exempt from the requirements of section 47 and must include a complete identification statement or disclaimer.

Very truly yours,



Phillip T. Frangos, Director  
Office of Hearings and Legislation

PTF:rlp