

## 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



LANSING

MICHIGAN 48918

August 13, 1990

Joan M. Older  
 Citizens for Joan Older  
 582 Cedardale Drive  
 Rose City, Michigan 48654

Dear Ms. Older:

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.

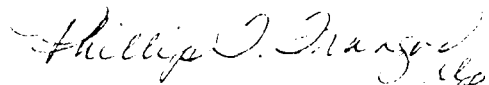
You have requested an exemption for a wooden nickel, which presumably is similar in size to a five cent coin. According to your printer, there is insufficient space to include an identification statement or disclaimer on the wooden nickel.

The Department has previously interpreted the Act as exempting a number of items due to their size, including bingo chips, buttons, clothespins and wooden rulers. The wooden nickel which is the subject of your request is of a comparable size or smaller.

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It would be unreasonable and, according to your printer, perhaps impossible to include an identification statement or disclaimer on such a small item. Therefore, the Department has determined that a wooden nickel which is the approximate size of a five cent coin is exempt from the requirements of section 47 of the Act.

Very truly yours,



Phillip T. Frangos, Director  
Office of Hearings and Legislation

PTF:rlp