

December 31, 2024

The Honorable Jocelyn Benson
Secretary of State
State of Michigan
430 W. Allegan
Lansing, MI 48918

Dear Secretary Benson:

The Detroit Regional Chamber (Chamber) seeks guidance on Public Act 472 of 1978, which regulates lobbying activity related to public officials, as the Chamber prepares for the nationally recognized Mackinac Policy Conference of 2025 and subsequent years to ensure our organization remains fully compliant with the latest interpretations of the Act. This formal correspondence comes after an examination of the Act, review by Chamber legal counsel, and productive consultations with your staff.

The Chamber's central question is: *can the Chamber, as a lobbyist agent, provide complimentary admission to the Mackinac Policy Conference to public officials as part of their official public duties?* The Mackinac Policy Conference is a fundraiser for the Chamber to fund our non-profit 501(c)3 foundation mission and other activities. Chamber members are charged \$3,200 registration to participate in this annual high-profile leadership convening and to support the Chamber's non-profit mission. As an organization that sits at the intersection of business and public policy, connecting our business leadership membership to public policy officials is a critical element of our mission – and we believe – very much in the public interest.

Chamber data demonstrates that our membership and Conference participants highly value the opportunity to interact with public officials, and the Conference is regarded as one of the best opportunities in which to do so. Given this dynamic, the Chamber calculates the value of participating public officials at roughly \$6,004 per official based on the number of covered officials in attendance and the total charges to sponsors and registrants to support and execute the Conference.

Public officials are invited, and expected to, participate in numerous official Conference events, including but not limited to various receptions and events with Conference attendees, attending Conference thought leadership sessions with national and state corporate, academic and philanthropic leaders, sessions with Michigan's Congressional delegation, Governor, legislative leadership, locally elected officials as well as scheduled media interviews with the roughly 115 state and national media that cover this nationally-recognized event. The Mackinac Policy Conference provides the media their best 'one-stop' access to Michigan's key elected and appointed public officials annually. Additionally, the Chamber and its sponsors take pro-active measures to ensure participating public officials have on-site workspace to execute their public duties while participating at the Conference.

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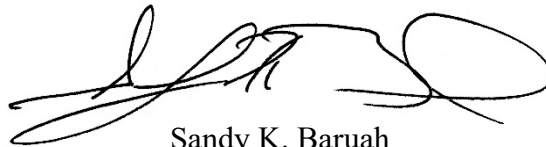
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The Detroit Regional Chamber has existed for well over 100 years to help influence Michigan public policy advancing an economic prosperity agenda for our state's long-term health and population growth. Our members surveys show that access to key public official officials is a key rationale for engagement with the Chamber. The long-standing Mackinac Policy Conference is a key reason Michigan businesspersons engage with the Chamber.

The Chamber anticipates roughly 100 Michigan elected officials and 25 executive branch members receiving complimentary invitations subject to Public Act 472 of 1978. In past years, other public officials have attended the Conference as paying guests. Given that registration exceeds the current "gift" limit, the Chamber seeks guidance on whether this complimentary registration would qualify as a "gift" given the most recent interpretation of Act 472 of 1978.

If your team have any questions, please contact Brad Williams, Vice President of Political Affairs, at 517.402.1744 (mobile) or bwilliams@detroitchamber.com, or me directly. The Chamber is pleased to provide further details on our calculations and provide any additional information the State of Michigan deems necessary to determine this important issue. In advance, thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sandy K. Baruah', with a large, stylized flourish at the end.

Sandy K. Baruah

President and Chief Executive Officer