

# MODIFICATION REQUEST COVER SHEET

<b>Name of Filer</b>	<b>ANNE COWLES</b>
<b>Reporting Period</b>	<input checked="" type="checkbox"/> Annual report – calendar year 2019 <input type="checkbox"/> Candidate/Appointee report
<b>Type of Request</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>original granted on October 27, 2016</u> <input checked="" type="checkbox"/> Full Commission Approval – <u>October 27, 2016</u> <input type="checkbox"/> Renewal with Change
<b>Office Held/Sought &amp; Term</b>	School Board Member, Spokane International Academy Left position December 2019
<b>Application Rule(s)</b>	<input checked="" type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(b) <input type="checkbox"/> Personal Residence: WAC 390-28-100(d) <input type="checkbox"/> Attorney: WAC 390-28-100(1)(e)(i) <input type="checkbox"/> Judge / Judicial Candidate: WAC 390-28-100(1)(e)(ii) <input checked="" type="checkbox"/> Spousal: <a href="#">WAC 390-28-100(1)(e)(iv)</a> <input type="checkbox"/> Other: WAC 390-28-100(1)(a)(c)
<b>Explanation of Rule(s)</b>	<p><b>Income and ownership interests.</b> An applicant may be exempted from reporting the information otherwise required by RCW <a href="#">42.17A.710</a> (1)(f) and (g), if:</p> <ul style="list-style-type: none"> <li>(i) Public disclosure would violate any legally recognized confidential relationship;</li> <li>(ii) The information does not relate to a business entity which would be subject to the regulatory authority of the office sought or held by the applicant in whole or in part;</li> <li>(iii) Such reporting would present a manifestly unreasonable hardship to the applicant including but not limited to adversely affecting the competitive position of an entity in which the applicant had an interest of ten percent or more as described in RCW <a href="#">42.17A.120</a>; and</li> <li>(iv) The interest in question would present no actual or potential conflict with the performance of the duties of the office sought or held.</li> </ul> <p><b>Applicants whose spouse or registered domestic partner creates a reporting obligation for the applicant.</b> When an applicant is required to report the activities of an entity solely because the applicant's spouse or registered domestic partner held an office, directorship, general partnership or ownership interest in the entity and the applicant does not have direct knowledge of the information that must be reported, the applicant may be allowed to satisfy the disclosure requirements of RCW <a href="#">42.17A.710</a> (1)(g)(ii) and WAC <a href="#">390-24-020</a> by disclosing reportable customers from whom compensation in excess of the disclosure threshold established under RCW <a href="#">42.17A.710</a> (1)(g)(ii) has been received as follows:</p> <ul style="list-style-type: none"> <li>(A) All payments made by the agency or jurisdiction in which the applicant seeks or holds office to the entity;</li> <li>(B) The business and other governmental customers or clients of the applicant's spouse/domestic partner and of the entity of which the applicant is aware; and</li> <li>(C) Any other business and other governmental customers or clients of the entity whose identities are known to the applicant and whose interests are significantly affected by the agency or jurisdiction in which the applicant seeks or holds office.</li> </ul> <p>The commission may apply (e)(i) through (iii) of this subsection when the applicant's spouse/domestic partner is a lawyer, judge, or motor vehicle dealer.</p>

<b>Supporting Documents</b> (attached)	<input checked="" type="checkbox"/> Current F-1 (originally filed July 22, 2020 & amended August 12, 2020) <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Prior order (if renewal) – April 25, 2019
<b>Reason(s) for Modification</b> (as stated by filer)	<ul style="list-style-type: none"><li>• Ms. Cowles is requesting a renewal of the reporting modification that would exempt her from disclosing the business and other governmental customers that paid \$12,000, during calendar year 2019, to Cowles Company, a privately-owned holding company with multiple subsidiaries of which her spouse is President and part owner.</li><li>• Ms. Cowles is also requesting a reporting modification that would exempt her from disclosing the parcel numbers or legal description of raw and timber land owned by Cowles Company and from disclosing the legal names of family trusts of which she is a trustee.</li><li>• Ms. Cowles stated in her previous request that several of Cowles Company's subsidiaries do business across the country, have approximately 900 employees, maintain various family trusts, private personal trusts and two family foundations. She stated that thousands of customers would be subject to disclosure.</li><li>• Ms. Cowles stated previously that it would cause a hardship to provide a list of reportable business and other governmental customers of Cowles Company due to confidentiality agreements and that disclosure would place them at a competitive disadvantage. She stated that it would cause a hardship to provide a list of the raw and timber land owned by Cowles Company due to the volume of properties. Lastly, Ms. Cowles stated that to identify the individual family trusts would infringe upon the personal privacy of various family members, potentially exposing them to unknown harm.</li></ul>
<b>Other Issues</b>	<p>Ms. Cowles confirmed that Spokane International Academy made no payments to Cowles Company and disclosed no governmental customers during 2019.</p> <p>Ms. Cowles has reviewed her initial reporting modification request and any subsequent renewal requests and has certified that there are no changes to the fact related to her request.</p>