MODIFICATION REQUEST COVER SHEET

Name of Filer	BENSON D. WONG
Reporting Period	☑ Annual report – calendar year 2013 □ Candidate/Appointee
Type of Request	 □ New ☑ Renewal with No Change – <u>original granted on June 27, 2013</u> □ Renewal with Change
Office Held/Sought & Term	City Council Member, City of Mercer Island Term expires: December, 2017
PDC Protocol	□ Attorney: Interpretation #02-03 □ Judge / Judicial Candidate: Interpretation #02-04 □ Automobile Dealership: Interpretation #02-05 □ Spousal: Interpretation #02-06 □ WAC
Supporting Documents (attached)	☑ Current F-1 ☑ Modification Application ☑ Letter ☑ Prior order (if renewal) – <u>Order #3125</u>
Reason(s) for Modification (as stated by filer)	 Mr. Wong is requesting a reporting modification that would exempt him from disclosing the business customers that paid \$10,000 or more during 2013 to Keller Rohrback LLP, a law firm.
	Mr. Wong is an attorney with Keller Rohrback serving on its Executive Committee. He stated that his duties involve setting general policy and approving extraordinary contracts. Mr. Wong stated that his ownership interest in the firm is less than 10%.
	Mr. Wong stated that he is not involved in the day-to-day operation of the firm and that as a partner in the firm he does not have access to reportable clients.
	Keller Rohrback LLP is a mid-size law firm in Seattle. The firm has small branch offices in New York City and Santa Barbara, with an affiliated office in Phoenix.
	Mr. Wong stated that disclosing the revenue of the firm would adversely affect the firm's competitive position in the legal community.
	Keller Rohrback LLP has 118 employees consisting of support staff and lawyers in addition to 28 partners.
	 Mr. Wong stated that the firm has approximately 150 reportable clients and that disclosing these clients would allow other firms to target these clients in a more strategic manner. In addition, Mr. Wong stated that he believes the clients themselves may suffer competitive disadvantage within their respective areas of business and industries.

	 Mr. Wong stated that there were no payments made from the City of Mercer Island to Keller Rohrback LLP during 2013. In his request letter, Mr. Wong provided information in accordance with PDC Interpretation #02-03:
	 A listing of the clients he represented and did legal work for Keller Rohrback in 2013;
	 A statement that in 2013 Keller Rohrback had no business customers whose interests were significantly affected by his actions on the Mercer Island City Council;
	3. A listing of the Keller Rohrback clients that were already publicly identified;
	 A listing of other governmental customers in Washington that Keller Rohrback did business with in 2013.
Other Issues	Mr. Wong stated that he will recuse himself from any preceedings involving clients of the firm that are before the Mercer Island City Council.
Staff Recommendations	Approve renewal of the reporting modification with no change.