

MODIFICATION REQUEST COVER SHEET

Name of Filer	RILEY CLUBB
Reporting Period	<input checked="" type="checkbox"/> Annual report – calendar year 2017 <input type="checkbox"/> Candidate/Appointee report
Type of Request	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Full Commission Approval <input type="checkbox"/> Renewal with Change
Office Held & Term	Councilmember, City of Walla Walla Current Term expires in December, 2021
Application Rule(s)	<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 type="checkbox"/> Spousal: WAC 390-28-100(1)(e)(iv) <input type="checkbox"/> Other: WAC 390-28-100(1)(a)(c)
Explanation of Rule(s)	<p>Income and ownership interests. An applicant may be exempted from reporting the information otherwise required by RCW 42.17A.710 (1)(f) and (g), if:</p> <p>(i) Public disclosure would violate any legally recognized confidential relationship;</p> <p>(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;</p> <p>(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 42.17A.120; and</p> <p>(iv) The interest in question would present no actual or potential conflict with the performance of the duties of the office sought or held.</p>
Supporting Documents (attached)	<input checked="" type="checkbox"/> Current F-1 (filed April 5, 2018) <input checked="" type="checkbox"/> Modification Application <input type="checkbox"/> Prior order (if renewal)
Reason(s) for Modification (as stated by filer)	<ul style="list-style-type: none"> • Mr. Clubb is requesting a reporting modification that would exempt him from disclosing the business customers that paid \$12,000 or more during 2017 to Lowden Schoolhouse Corporation. • Lowden Schoolhouse Corporation is headquartered outside of the jurisdiction of the City of Walla Walla and owns no real estate. Its business inside of the city is limited to supplying wine to restaurants and wine shipments to wine club members. Mr. Clubb stated that the sales revenues within the city limits of Walla Walla, represent 1% of the total sales of Lowden Schoolhouse Corporation.

	<ul style="list-style-type: none">• Lowden Schoolhouse Corporation sells approximately 40,000 cases of wine each year to customers worldwide. In fiscal year 2017, they had approximately \$8.5 million in sales. The business employs 22 people and serves approximately 15,000 total customers around the world. Mr. Clubb stated that approximately 55 business customers would be reportable.• Mr. Clubb has a 10% or more ownership interest of Lowden Schoolhouse Corporation. He stated that his shares are limited in voting power and that he has no control over the management decisions.• Mr. Clubb stated that the global market for wine made in Walla Walla has become extremely competitive over the last 20 years and that disclosing the customer list would invite new competition from other wineries.
Other Issues	<p>Mr. Clubb confirmed that Lowden Schoolhouse Corporation received no payments from the City of Walla Walla during 2017.</p> <p>Mr. Clubb has agreed to recuse himself if a matter came before him involving a conflict of interest between Lowden Schoolhouse Corporation and the City of Walla Walla.</p>