

# MODIFICATION REQUEST COVER SHEET

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<b>Name of Filer</b>	<b>KELLI CURTIS</b>
<b>Reporting Period</b>	<input checked="" type="checkbox"/> Annual reports – covering calendar years 2016, 2017, 2018 and 2019 <input type="checkbox"/> Candidate/Appointee report
<b>Type of Request</b>	<input type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input checked="" type="checkbox"/> Full Commission Approval – <u>August 25, 2016</u> <input checked="" type="checkbox"/> Renewal with Change – <u>original granted on August 25, 2016</u>
<b>Office Held/Sought &amp; Term</b>	Previous Community Council Member, Houghton Community Municipal Corporation Served from May 5, 2016 to February 25, 2019  Current City Council Member, City of Kirkland Current Elected term expires December 31, 2023
<b>Application Rule(s)</b>	<input 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>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> <p>(A) All payments made by the agency or jurisdiction in which the applicant seeks or holds office to the entity;</p> <p>(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</p> <p>(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.</p> <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 (attached)</b>	<input checked="" type="checkbox"/> Current F-1 (filed April 5, 2020) <input checked="" type="checkbox"/> F-1 (filed March 2, 2019) <input checked="" type="checkbox"/> F-1 (filed March 4, 2018) <input checked="" type="checkbox"/> F-1 (filed March 20, 2017) <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Additional Information <input checked="" type="checkbox"/> Prior order (if renewal) – August 25, 2016
<b>Reason(s) for Modification (as stated by filer)</b>	<ul style="list-style-type: none"> <li>Ms. Curtis is requesting renewal of a previously granted reporting modification that would exempt her from disclosing the business and other governmental</li> </ul>

customers that paid \$12,000, during calendar year 2019 and retroactively for calendar years 2016, 2017 and 2018, to Spaceflight Industries, Inc., a company engaged in launch and satellite services of which her spouse is CEO with less than 10% ownership interest.

- Ms. Curtis is also requesting a new reporting modification that would exempt her from disclosing the business and other governmental customers that paid \$12,000, during calendar year 2019 to Pacific Science Center of which her spouse serves as a board member.

#### Spaceflight Industries, Inc.

- Ms. Curtis stated that Spaceflight has approximately \$70 million in annual sales, with 125 customers, 35 employees. It is based in Seattle and provides launch services for small satellites by purchasing capacity on launch vehicles around the world and providing launch integration services for its customers.
- Ms. Curtis stated that it would cause a hardship to provide a list of reportable business customers of Spaceflight Industries, Inc. because it would create a competitive disadvantage vis-a-vis its competitors and would violate confidentiality agreements.
- Ms. Curtis stated that it would cause a hardship to provide a list of reportable governmental customers of Spaceflight Industries, Inc. because some of the US Government customers would not want the public disclosure regarding their launch contracts.
- Ms. Curtis stated that Spaceflight Industries, Inc. has no city or state customers, other than some universities that are not located in Washington.
- Ms. Curtis stated that there are about 100 business customers, all of which spend more than \$12,000 during reporting period and that all 25 governmental customers also spend over \$12,000 during the reporting period.
- Ms. Curtis stated that Spaceflight Industries, Inc. is not located in the City of Kirkland and that no payments were made by the City of Kirkland to Spaceflight Industries, Inc. during calendar years 2016, 2017, 2018 or 2019.

#### Pacific Science Center

- Pacific Science Center is a non-profit with an annual budget of over \$20 million supported by hundreds of guests, members, business partners and contributors.
- Ms. Curtis stated that her spouse is a volunteer member of the Pacific Science Center Board and that she has no financial interest in the organization.
- Ms. Curtis stated that collecting the list of reportable customers would be a burden on the organization during the best of times. As a result of COVID-19 it is closed to the public and has laid off more than 90% of its staff. Ms. Curtis has asked and was told that they cannot provide this data under the circumstances but did provide their most recent IRS Form 990.

	<ul style="list-style-type: none"><li>• Ms. Curtis confirmed that no payments were made by the City of Kirkland to Pacific Science Center during calendar year 2019.</li></ul>
<b>Other Issues</b>	<p>Ms. Curtis has agreed to recuse herself if a matter came before her involving a conflict of interest between either Spaceflight Industries, Inc. or Pacific Science Center and the City of Kirkland.</p> <p>The applicant's spouse, Curtis Blake, will be participating by phone.</p>