

MODIFICATION REQUEST COVER SHEET

Name of Filer	JENNY A. DURKAN
Reporting Period	<input type="checkbox"/> Annual report <input checked="" type="checkbox"/> Candidate report – Previous 12 months
Type of Request	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Renewal with Change
Office Held/Sought & Term	Candidate for Mayor, City of Seattle Elected term would begin January 2018
Application Rule(s)	<input type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(b) <input checked="" type="checkbox"/> Personal Residence: WAC 390-28-100(d) <input checked="" 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>Personal residence - Real property. Regarding reporting the information otherwise required by RCW 42.17A.710 (1)(h) through (k):</p> <p>(i) Under WAC 390-24-200, the filer shall list the street address of each parcel, the assessor's parcel number, the abbreviated legal description appearing on property tax statements, or the complete legal description. Each property description shall be followed by the name of the county in which the property is located.</p> <p>(ii) No modification will be necessary if the filer describes the real property using one of the alternatives in WAC 390-24-200, plus the name of the county.</p> <p>(iii) A modification will be required if the filer seeks some other means to describe reportable real property including the personal residence of the filer. The commission may consider a modification, for example, when the filer or his or her immediate family member has received a threat, has a no contact order, or presents a similar personal safety concern.</p> <p>A prospective modification to allow nondisclosure of a residential address may be granted if the applicant or an immediate family member has received a threat, been issued a no contact order or presents a similar personal safety concern.</p> <p>Lawyers and law firms (when applicant is an incumbent or candidate and acts alone or as part of a governing body, board, or commission). An applicant may be allowed to satisfy the reporting requirements of RCW 42.17A.710 (1)(g)(ii) and WAC 390-24-020 by disclosing reportable clients from whom compensation has been paid in excess of the reporting threshold as follows:</p> <p>(A) The names of the business clients for whom the applicant has done legal work;</p>

	<p>(B) Other clients of the law firm whose interests are significantly affected by the applicant's actions as an elected or appointed official or whose actions will be affected by the applicant's action should the applicant be elected whose identities become known to the applicant through any means;</p> <p>(C) The names of the clients of the law firm who are listed in Martindale Hubbell, the firm's resume, web site, or similar promotional materials; and</p> <p>(D) Governmental clients that have done business with the law firm. An applicant may also be required to disclose all business customers from whom compensation in excess of the reporting threshold has been received whose identities are publicized or referenced in documents open for public inspection at the courts, in administrative hearings, at proceedings conducted by public agencies, or are a matter of public knowledge in other similar public forums. Alternatively, the commission may require an applicant to report only those publicly identifiable customers of which the applicant is aware.</p>
<p>Supporting Documents (attached)</p>	<p><input checked="" type="checkbox"/> F-1 (filed May 23, 2017)</p> <p><input checked="" type="checkbox"/> Modification Application</p> <p><input type="checkbox"/> Prior Order (if renewal)</p>
<p>Background</p>	<p>Ms. Durkan has provided a list of business and governmental customers that either she or one of the other attorneys in the Seattle office has done work for during the previous twelve months. She has also included all other clients located in Washington State regardless of their connection to the Seattle office.</p>
<p>Reason(s) for Modification (as stated by filer)</p>	<p><u>Personal Residence</u></p> <ul style="list-style-type: none"> • Ms. Durkan is requesting a reporting modification that would exempt her from reporting real estate, including street address, parcel number, or legal description, on her Personal Financial Affairs Statement for the previous 12 months. • Ms. Durkan served as a U.S. Attorney from October 2009 to September 2014. • Ms. Durkan stated that her residence is part of the Address Confidentiality Program and would like to continue to have her address remain undisclosed for safety.

	<p><u>Attorney/Law Firm</u></p> <ul style="list-style-type: none">• Ms. Durkan is a partner of Quinn Emanuel Urquhart & Sullivan, LLP, an international law firm with 21 offices on 4 continents and in 10 countries.• Ms. Durkan stated that she works out of the Seattle office which is only 2 years old and employs only 3 of the 650 attorneys. She has limited involvement in day-to-day operations of the Seattle office only.• Ms. Durkan is requesting a reporting modification that would exempt her from listing the business and governmental customers that made payments of \$12,000 or more to the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, during the previous 12 months.• Ms. Durkan stated that Quinn Emanuel Urquhart & Sullivan, LLP employs over 650 attorneys and is one of the 70 largest law firms in the United States.• Ms. Durkan stated that listing all of the reportable clients would create a hardship due to the various office locations, the way in which the clients are typically listed and an inability to sort the list of clients.
Staff Recommendations	Approve the requested reporting modification.