

MODIFICATION REQUEST COVER SHEET

Name of Filer	DEBORAH EHRLICHMAN
Reporting Period	<input checked="" type="checkbox"/> Annual report – calendar year 2016 <input type="checkbox"/> Candidate/Appointee report
Type of Request	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>original granted June 9, 2005</u> <input type="checkbox"/> Renewal with Change
Office Held & Term	School Board Director, Shoreline School District #2 Elected term expires December, 2017
Application Rule(s)	<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: WAC 390-28-100(1)(e)(iv) <input type="checkbox"/> Other: WAC 390-28-100(1)(a)(c)
Explanation of Rule(s)	<p>Applicants whose spouse or registered domestic partner creates a reporting obligation for the applicant. 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 42.17A.710 (1)(g)(ii) and WAC 390-24-020 by disclosing reportable customers from whom compensation in excess of the disclosure threshold established under RCW 42.17A.710 (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. 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>
Supporting Documents (attached)	<input checked="" type="checkbox"/> Current F-1 <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Letter <input checked="" type="checkbox"/> Prior order (if renewal) – March 15, 2016
Reason(s) for Modification (as stated by filer)	<ul style="list-style-type: none"> Ms. Ehrlichman is requesting a renewal of the reporting modification that would exempt her from disclosing the business customers that paid \$12,000 or more during 2016 to Dorsey & Whitney, LLP, a law firm.

	<ul style="list-style-type: none">• Ms. Ehrlichman's spouse, Peter Ehrlichman, is a partner in the Seattle office of Dorsey & Whitney and has less than a 1% ownership interest in the firm. Dorsey & Whitney, based out of Minnesota, has over 550 attorneys practicing within 19 offices. The Seattle office has approximately 65 attorneys.• Ms. Ehrlichman stated that the firm has over 10,000 clients worldwide, most of whom would be reportable, and compiling this information would create a significant hardship on the law firm.• Ms. Ehrlichman stated she is not involved with the operations of the firm. She said that, other than his own clients, her spouse is not involved in the day-to-day operations of the firm. The firm's clients are not disclosed in any marketing materials or in Martindale-Hubbell.
Other Issues	<ul style="list-style-type: none">• Ms. Ehrlichman stated that Dorsey & Whitney does not do business with the Shoreline School District and did not make any payments to the district.• Ms. Ehrlichman disclosed the business clients for whom her spouse provided legal services during 2016. She said he had no governmental customers.
Staff Recommendations	Approve renewal of the reporting modification with no change.