

## MODIFICATION REQUEST COVER SHEET

<b>Name of Filer</b>	<b>SCOTT MOORE</b>
<b>Reporting Period</b>	<input checked="" type="checkbox"/> Annual report – Covering Calendar Year 2019 <input type="checkbox"/> Candidate report
<b>Type of Request</b>	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Full Commission Approval <input type="checkbox"/> Renewal with Change
<b>Office Held/Sought &amp; Term</b>	City Council Member, City of Clyde Hill Term Expires: December 31, 2023
<b>Application Rule(s)</b>	<input checked="" type="checkbox"/> Income & Ownership Interest: <a href="#">WAC 390-28-100(1)(b)</a> <input type="checkbox"/> Personal Residence: WAC 390-28-100(1)(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)(e)
<b>Explanation of Rule(s)</b>	<p><b>Income and ownership interests: WAC 390-28-100(1)(b)</b></p> <p>(1) Under RCW 42.17A.120, the commission or presiding officer may modify reporting requirements, including the statement of financial affairs, if literal application of the requirement would work a manifestly unreasonable hardship and the suspension or modification would not frustrate the purpose of the law. One or more of the following may be considered by the commission or presiding officer as possible qualifications for a reporting modification with respect to the statement of financial affairs, when such standard is met:</p> <p>(b) 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 that serves a legitimate business interest;</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>

<b>Supporting Documents (attached)</b>	<input checked="" type="checkbox"/> Current F-1 for calendar year 2019 (filed April 6, 2020) <input checked="" type="checkbox"/> Modification Request Application (received April 6, 2020)
<b>Reason(s) for Modification (as stated by filer)</b>	<ul style="list-style-type: none"> <li>• Mr. Moore is requesting a modification to not disclose business customers paying \$12,000 or more to Ad Lightning Incorporated during the reporting period.</li> <li>• Mr. Moore states he is the CEO of this private company, which sells enterprise software to media companies, and cannot legally disclose the billings of their customers, as doing so would violate non-disclosure agreements and would present a competitive disadvantage to the company.</li> <li>• Mr. Moore states that the company made \$2.83 million in calendar year 2019, with 68 customer accounts, and 17 employees.</li> <li>• Mr. Moore states that 64 of those customers have paid \$12,000 or more during the reporting period.</li> <li>• Mr. Moore states that he does have access to the entity's customer list, is involved in the day-to-day operations of the entity, and the company has the ability to sort its customer list to identify those paying more than \$12,000 or more during the reporting period. .</li> <li>• Mr. Moore has not disclosed any of the entity's customers listed in public sources, publications, websites, or other public records.</li> <li>• Mr. Moore states that he has disclosed all payments made by the City of Clyde Hill to Ad Lightning Incorporated, but the City of Clyde Hill has no use for their products.</li> </ul>
<b>Other Issues</b>	<ul style="list-style-type: none"> <li>• Mr. Moore states that he will recuse himself if a matter came before her involving a conflict of interest between Ad Lightning Incorporated and his duties as a City Council Member for the City of Clyde Hill.</li> </ul>