

## MODIFICATION REQUEST COVER SHEET

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| <b>Name of Filer</b>                                   | <b>KATHLEEN M. O'SULLIVAN</b>  |
| <b>Reporting Period</b>                                | <input checked="" type="checkbox"/> Annual report – calendar year 2014<br><input type="checkbox"/> Candidate/Appointee report  |
| <b>Type of Request</b>                                 | <input type="checkbox"/> New<br><input checked="" type="checkbox"/> Renewal with No Change – <u>original granted on March 22, 2007</u><br><input type="checkbox"/> Renewal with Change   |
| <b>Office Held &amp; Term</b>                          | Member, Commission on Judicial Conduct<br>Appointed term expires in 2015   |
| <b>Application Rule(s)</b>                             | <input type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(b)<br><input type="checkbox"/> Personal Residence: WAC 390-28-100(d)<br><input checked="" type="checkbox"/> Attorney: WAC 390-28-100(1)(e)(i)<br><input type="checkbox"/> Judge / Judicial Candidate: WAC 390-28-100(1)(e)(ii)<br><input type="checkbox"/> Spousal: WAC 390-28-100(1)(e)(iv)<br>Other: WAC 390-28-100(1)(a)(c)  |
| <b>Supporting Documents (attached)</b>                 | <input checked="" type="checkbox"/> Current F-1<br><input checked="" type="checkbox"/> Letter<br><input checked="" type="checkbox"/> Prior order (if renewal) – <u>Order # 3183</u>  |
| <b>Reason(s) for Modification (as stated by filer)</b> | <ul style="list-style-type: none"> <li>• Ms. O'Sullivan is requesting a renewal of the reporting modification that would exempt her from disclosing the business customers that made payments of \$12,000 or more during 2014 to Perkins Coie, LLP, a law firm.</li> <li>• Ms. O'Sullivan is a partner in the law firm of Perkins Coie. Her ownership interest is less than 10%. She said that Perkins Coie is a large law firm and likely has thousands of reportable business clients. She said it would take a burdensome amount of time and effort to collect and disclose the reportable business clients of the firm.</li> </ul>   |
| <b>Other Issues</b>                                    | <ul style="list-style-type: none"> <li>• In her request letter, Ms. O'Sullivan provided information in accordance with WAC 390-28-100(1)(e)(i):               <ol style="list-style-type: none"> <li>1. A listing of the clients she represented and did legal work for Perkins Coie in 2014;</li> <li>2. A statement that in 2014 Perkins Coie had no business customers whose interests were significantly affected by actions of the Commission on Judicial Conduct;</li> <li>3. A listing of the Perkins Coie clients that were listed in the firms marketing materials in 2014;</li> <li>4. A listing of other governmental customers in Washington that Perkins Coie did business with in 2014.</li> </ol> </li> </ul> |
| <b>Staff Recommendations</b>                           | Approve renewal of the reporting modification with no change.  |