

## MODIFICATION REQUEST COVER SHEET

<b>Name of Filer</b>	<b>STEVEN T. O'BAN</b>
<b>Reporting Period</b>	<input checked="" type="checkbox"/> Annual report – calendar year 2012 <input type="checkbox"/> Candidate report
<b>Type of Request</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>Original granted April 22, 2010</u> <input type="checkbox"/> Renewal with Change
<b>Office Sought &amp; Term</b>	<p>State Senate, 28<sup>th</sup> Legislative District Appointed June 2013</p> <p>State Representative, 28<sup>th</sup> Legislative District Calendar Year 2012 until June 2013</p> <p>Mr. O'Ban is a state senator. He seeks a modification for the F-1 covering the reporting period when he was a state representative.</p>
<b>PDC Protocol</b>	<input checked="" type="checkbox"/> Attorney: Interpretation #02-03 <input type="checkbox"/> Judge / Judicial Candidate: Interpretation #02-04 <input type="checkbox"/> Automobile Dealership: Interpretation #02-05 <input type="checkbox"/> Spousal: Interpretation #02-06 <input type="checkbox"/> WAC
<b>Supporting Documents (attached)</b>	<input checked="" type="checkbox"/> Current F-1 <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Prior Order (if renewal) – <u>Order #3077</u>
<b>Background</b>	Mr. O'Ban has disclosed the identity of clients for whom he did legal work for during 2012.
<b>Reason(s) for Modification (as stated by filer)</b>	<ul style="list-style-type: none"> <li>• Mr. O'Ban is a member of Ellis, Li &amp; McKinstry, PLLC, a small Seattle law firm for which he has less than a 10% ownership interest.</li> <li>• Mr. O'Ban is requesting a modification that would exempt him from reporting the business customers that made payments of \$10,000 or more to the law firm of Ellis, Li &amp; McKinstry, PLLC during 2012.</li> <li>• Mr. O'Ban stated that Ellis, Li &amp; McKinstry, PLLC, is a small general practice law firm with 16 lawyers, and a total of 25 members and employees.</li> <li>• Mr. O'Ban stated he is not in a management position, and is not involved in the day-to-day operations of Ellis, Li &amp; McKinstry. He stated he does not have access to the business customers of Ellis, Li &amp; McKinstry, PLLC as part of his regular duties.</li> </ul>

	<ul style="list-style-type: none"><li>• Mr. O'Ban stated that to the best of his knowledge, the clients of Ellis, Li &amp; McKinstry, PLLC are not listed in any "public sources or publications." Pursuant to PDC Interpretation #02-03, Mr. O'Ban stated that he provided the following information:<ol style="list-style-type: none"><li>1. Reportable business customers of Ellis, Li &amp; McKinstry for which Mr. O'Ban has done legal work;</li><li>2. Ellis, Li &amp; McKinstry business customers whose identities are public; and</li><li>3. Ellis, Li &amp; McKinstry business customers whose interests are significantly affected by the actions of Mr. O'Ban by the Washington State Legislature.</li></ol></li><li>• Mr. O'Ban stated that during 2012, Ellis, Li &amp; McKinstry received no payments from the Washington State Legislature. He stated there were no governmental customers that paid \$10,000 or more during 2012.</li><li>• Mr. O'Ban stated that approving his report modification request "would not frustrate the purposes of the Act to relieve the law firm of disclosing client identities with which only non-applicant lawyers have relationships and where the applicant has an ownership interest in the law firm of less than 10%."</li></ul>
<b>Staff Recommendations</b>	Approve renewal of the reporting modification with no changes.