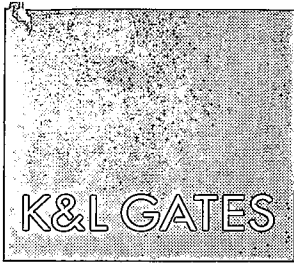


MODIFICATION REQUEST COVER SHEET

| | |
|--|--|
| Name of Filer | WILLIAM H. CHAPMAN |
| Reporting Period | <input checked="" type="checkbox"/> Annual report – calendar year 2012 <input type="checkbox"/> Candidate/Appointee report |
| Type of Request | <input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>original granted on December 2, 2004</u> <input type="checkbox"/> Renewal with Change |
| Office Held & Term | Chair, Recreation & Conservation Funding Board Current appointed term expires December, 2013 |
| PDC Protocol | <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 |
| Supporting Documents (attached) | <input checked="" type="checkbox"/> Current F-1 <input checked="" type="checkbox"/> Letter <input checked="" type="checkbox"/> Prior order (if renewal) – <u>Order #30</u> |
| Reason(s) for Modification (as stated by filer) | <ul style="list-style-type: none"> • Mr. Chapman is requesting renewal of a reporting modification that would exempt him from disclosing the business customers that paid \$10,000 or more during 2012, to K & L Gates, LLP (K & L Gates), a law firm. • Mr. Chapman is a partner with K & L Gates and has less than a 1% ownership interest. He stated that K & L Gates has 47 offices in the U.S. and internationally, with more than 2,100 attorneys, and more than 30,000 active cases or matter numbers. • Mr. Chapman stated that it would cause an undue hardship to disclose the reportable business customers of K & L Gates because to do so would require a manual review of each of the over 30,000 matters/active cases. |
| Other Issues | <p>Mr. Chapman has disclosed the following with his 2012 F-1 report:</p> <ul style="list-style-type: none"> • Reportable business clients for which he provided legal work; • K&L Gates public sector clients in Washington State; • K & L Gates business clients that have given permission and are listed on their website, or that are listed in K & L Gates promotional materials; and • A list of the reportable business clients of K & L Gates whose interests are significantly affected by the actions of the Interagency Committee for Outdoor Recreation. <p>Mr. Chapman disclosed that K&L Gates paid the Recreation & Conservation Funding Board \$1,000 for per diem during 2012.</p> |
| Staff Recommendations | Approve renewal of the reporting modification with no change. |



K&L GATES LLP
925 FOURTH AVENUE
SUITE 2900
SEATTLE, WA 98104-1158
T +1.206.623.7580 F +1.206.623.7022 klgates.com

RECEIVED

MAR 15 2013

Public Disclosure Commission

February 28, 2013

DATE FILED PDC

MAR 13 2013

Washington State Public Disclosure Commission
Attn: Reporting Modification Request
P.O. Box 40908
Olympia, WA 98504-0908

Re: Request for Modification of Reporting Requirements

To Whom it May Concern:

I serve as a Chair of the Recreation and Conservation Funding Board for the state of Washington. In prior years, the Public Disclosure Commission has granted my request for a reporting modification on the Form F-1 regarding disclosure of our law firm's clients under the attorney/client privilege. I would like to request a renewal of the modification.

In prior years, my law partner Grace Yuan has corresponded with you on behalf of herself, other partners, and me, each of whom owned various appointed positions on University or other state boards. We have always appreciated your cooperation in working with us to assure that the PDC rules are applied appropriately to our positions and the law partnership to which we belong (each of us is a shareholder/partner in the K&L Gates law firm, formerly Preston Gates & Ellis prior to January 1, 2007 merger).

Currently, K&L Gates, LLP has over 2,100 attorneys and forty-seven offices in the United States and internationally. I personally own significantly less than 10% (in fact less than 1%) of the firm's equity. My duties within the entity do not include setting policy, hiring, approving contracts or budgets, and I have no formal role in management other than as an equity partner. Finally, other than her community interest in my law firm partnership, my spouse has no interest in any entity relevant to the PDC questionnaire.

The K&L Gates firm has more than 30,000 active matter numbers nationally and internationally. The matter numbers are not coded by whether the matter is in the court system, in administrative hearing, or has otherwise been disclosed in meetings of public agencies or in other public forums. In order for me to respond literally to Section 1(c)(ii) to (iv) of PDC Interpretation No. 02-03, it would require a manual review of each of the over 30,000 matter numbers. In many cases, discussions with the attorney(s) handling the matter would also be required in order to ascertain whether a specific matter falls within the definition of the subsections. I believe that to require a literal compliance would cause undue hardship, and ask you to recommend accordingly as the PDC has done previously.

DATE FILED PDC

MAR 13 2013

I would like to propose the following disclosure which should address the purposes of the public disclosure statute. First, I will provide the names of the reportable business clients for whom I personally have provided legal service more than 10 hours in 2012. Second, I will provide a list of all the governmental clients in Washington state that have done business with the law firm in 2012; the work is primarily performed by my colleagues in other departments. Third, I will provide a list of reportable business clients of the law firm where I am aware their interests might be significantly affected by my actions in my official capacity as a member of the Recreation and Conservation Funding Board in addition to the governmental clients listed above. Fourth, I will provide the names of the reportable business clients of the law firm who are listed in the firm's publicity brochure(s), the firm's resume, website, or similar promotional materials of the firm.

We have provided our website address below.

I request a hearing in absentia pursuant to RCW 42.17.370(10) and WAC 390-28-070. Pursuant to WAC 390-28-070, I hereby waive my appearance at the hearing and instead rely on this notarized letter.

I certify under penalty of perjury under the laws of the State of Washington that the facts set forth in the attached application for a reporting modification are true and accurate to the best of my actual knowledge or belief.


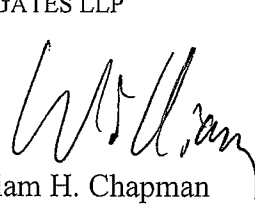
If you have any questions, please call. Thank you for your consideration of this matter.

Very truly yours,

K&L GATES LLP

By

William H. Chapman

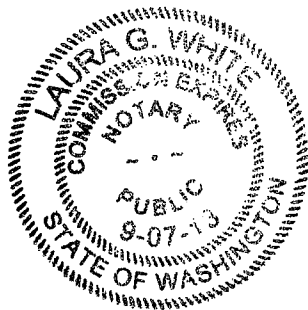


Website: www.klgates.com

Enclosure

MAR 13 2013

SUBSCRIBED AND SWORN to before me this 28th day of February, 2013.



Laura G. White
NOTARY PUBLIC in and for the State of Washington,
residing at Kent
My commission expires 4-7-13
Print/Type name Laura G. White

List of Reportable Business Clients – More than 10 Hours Legal Service Provided:

Blaser Die Casting Co.
Bornstein Seafoods
Brooks Manufacturing Co.
General Electric
Holland America Line, Inc.
The Hulbert Family Defense Group
Kimberly-Clark Worldwide, Inc.
King County Library System
Lennar Multifamily Investors, LLC
Millennium Bulk Terminals-Longview LLC
Nestle Waters North America Inc.
The Oeser Company
Pasciuto Family Trust
Spokane Rock Products/Eucon Corporation
Sterling Realty Organization

DATE FILED PDC

MAR 13 2013

K&L Gates Public Sector Clients in Washington State with 2013 Receipts over \$10,000:

Aberdeen School District
Anacortes, Port of
Auburn School District No
Bellevue School District
Bothell, City of
Central Kitsap School District
Chehalis, Port of, IDC
City of Millwood
City of Spokane
City of Tacoma, Dept. of
C-TRAN
Eatonville School District
Enumclaw School District
Everett, City of
F5 Networks, Inc.
Federal Way School District
Ferndale School District
Foss Waterway Development
Friday Harbor, Town of
Hood Canal School District
Issaquah School District
King County, Washington
Klickitat Co. PUD #1
Lake Washington School
District
Lynden, City of, Washington
Marysville School District
Mercer Island School Dist
Monroe School District No
Moses Lake, City of
Mount Vernon School District
Northshore School District
Ocean Shores, City of
Okanogan School District
Olympia School District #
Olympia, City of
Orting School District No
Pacific Hospital Preservation
Pasadena Park Irrigation
Pierce Transit
Pike Place Market & Dev.
PUD No. 1 of Whatcom County
Puget Sound School Coalition
Pullman, City of
Raymond, City of
Riverview School District
Rochester School District
Seattle City Employees' R
Seattle City Light

DATE FILED PDC

MAR 13 2013

Seattle, Port of
Sedro-Woolley School Dist
Skagit County, Port of
Snohomish County Housing
Snohomish School District
Snoqualmie Valley School
South Correctional Entity
South Whidbey School Dist
Spokane County Conservation
Spokane Transit Authority
Spokane, City of
Steilacoom Historical Sch
Stevens Public Utility Di
Sultan School District No
Sunnyside School District
Tacoma School District No
Tacoma, Port of
Toppenish School District
Tumwater School District
University Place School D
Vancouver, City of, Washington
Vancouver, Port of
Vera Water and Power
Washington State Democrat
Washington State Public S
Washington, State of
West Valley School District
Westport, City of, Washington
Yakima School District #7
Yakima, City of, Washington

DATE FILED PDC

MAR 13 2013

List of Reportable Business Clients of K&L Gates – Interests Potentially Significantly Affected:

Mountains to Sound Greenway Trust (pro bono)
Washington Wildlife and Recreation Coalition (pro bono)

DATE FILED PDC


MAR 13 2013

The following Representative Clients have kindly granted us permission to include them on our list of representative clients:

Alcoa Inc.
Allegheny Technologies Incorporated
Archer Daniels Midland Company
Bank of America Corporation
Baxter International Inc.
Brightstar Corp.
Carnegie Mellon University
CBS Corporation
Crane Co.
Duke Energy Corporation
E. I. du Pont de Nemours and Company
Eaton Vance Corp.
Education Management Corporation
Ericsson Inc.
Flow International Corporation
Freeport McMoran Copper & Gold
FUJIFILM America, Inc.
The Goldman Sachs Group, Inc.
Halliburton Company
Henderson Global Investors
Honeywell International Inc.
Ingersoll Rand
John Hancock Financial Services, Inc.
Laing O'Rourke Plc
Man Investments, Inc.
Merrill Lynch & Co., Inc.
Microsoft Corporation
Philips Electronics North America Corporation
PPG Industries, Inc.
PPL Corporation
Sprint Nextel Corporation
Starbucks Corporation
T-Mobile USA, Inc.
UBS Financial Services Inc.
United Technologies Corporation
Viacom Inc.
Wm. Wrigley Jr. Company
World Wrestling Entertainment, Inc.
Xerox

DATE FILED PDC

MAR 13 2013

| | | | |
|--|----------------------------------|---|--|
|  PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828 | PDC FORM F-1 (1/12) | PERSONAL FINANCIAL AFFAIRS STATEMENT | PDC OFFICE USE DATE FILED PDC MAR 13 2013 |
|--|----------------------------------|---|--|

Refer to instruction manual for detailed assistance and examples.

Deadlines: Incumbent elected and appointed officials – by April 15.
Candidates and others – within two weeks of becoming a candidate or being newly appointed to a position.

SEND REPORT TO PUBLIC DISCLOSURE COMMISSION

| DOLLAR CODE | AMOUNT |
|-------------|----------------------|
| A | \$1 to \$3,999 |
| B | \$4,000 to \$19,999 |
| C | \$20,000 to \$39,999 |
| D | \$40,000 to \$99,999 |
| E | \$100,000 or more |

| | |
|---|---|
| Last Name: CHAPMAN First: WILLIAM Middle Initial: H | Names of immediate family members, including registered domestic partner. If there is no reportable information to disclose for dependent children, or other dependents living in your household, do not identify them. Do identify your spouse or registered domestic partner. See F-1 manual for details. FRANCES L CHAPMAN SP |
| Mailing Address (Use PO Box or Work Address) 7703 RIDGECREST LANE City: MERCER ISLAND County: KING Zip + 4: 98040 | |

Filing Status (Check only one box.)

An elected or state appointed official filing annual report

Final report as an elected official. Term expired: _____

Candidate running in an election: month _____ year _____

Newly appointed to an elective office

Newly appointed to a state appointive office

Professional staff of the Governor's Office and the Legislature

Office Held or Sought
Office title: STATE BOARD/COMMISSION MEMBER

County, city, district or agency of the office,
name and number: RECREATION & CONSERVATION

Position number: _____

Term begins: 02-01-2011 ends: 12-31-2013

1 INCOME List each employer, or other source of income (pension, social security, legal judgment, etc.) from which you or a family member, including registered domestic partner, received \$2,000 or more during the period. (Report interest and dividends in Item 3 on reverse)

| Show Self (S) Spouse (SP/DP) Dependent (D) | Name and Address of Employer or Source of Compensation | Occupation or How Compensation Was Earned | Amount: (Use Code) |
|--|--|---|--------------------|
| S | K&L Gates' LLP 925 FOURTH AVENUE SUITE 2900, SEATTLE 98 WA | ATTORNEY | E |

Check Here if continued on attached sheet

2 REAL ESTATE List street address, assessor's parcel number, or legal description AND county for each parcel of Washington real estate with value of over \$10,000 in which you or a family member, including registered domestic partner, held a personal financial interest during the reporting period. (Show partnership, company, etc. real estate on F-1 supplement.)

| Property Sold or Interest Divested | Assessed Value (Use Code) | Name and Address of Purchaser | Nature and Amount (Use Code) of Payment or Consideration Received | | | |
|--|---------------------------|--|---|----------------|--|---|
| Property Purchased or Interest Acquired | | Creditor's Name/Address | Payment Terms | Security Given | Mortgage Amount - (Use Code) Original Current | |
| All Other Property Entirely or Partially Owned | E | Suntrust P.O. Box 26149 Richmond VA 23260 | MONTHLY | DOT | E | E |

7703 RIDGECREST LANE,
MERCER ISLAND, WA 98040,
Check here if continued on attached sheet

CONTINUE ON NEXT PAGE

INSURANCE CONTINUED

MAR 13 2013

F-1

Name

CHAPMAN, WILLIAM H

Page

3

3

ASSETS / INVESTMENTS - INTEREST / DIVIDENDS

B. Name and address of each insurance company

Type of Account or Description of Asset

Asset Value
(Use Code)Income Amount
(Use Code)

Metropolitan Life Insurance
200 Park Avenue
New York NY 10166

Supplemental Life
Insurance

E

0

MAR 13 2013

COMPANY, ASSOC., GOVERNMENT AGENCY CONTINUED

F-1

Name CHAPMAN, WILLIAM H

Page 4

3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS

| C. Name and address of each company, association, government agency | Type of Account or Description of Asset | Asset Value (Use Code) | Income Amount (Use Code) |
|---|--|------------------------|--------------------------|
| P. O. BOX 173375 DENVER CO 80217 | DODGE & COX/MUTUAL FUND (SEP/IRA, 100% Int'l) | D | A |
| NEUBERGER BERMAN 605 THIRD AVE. NEW YORK CITY NY 10158 | SEP/MUTUAL FUND | D | A |
| C/O K&L Gates LLP 925 4TH AVE. STE. 2900, SEATTLE WA 98104 | 701 FUND | B | A |
| K&L Gates LLP 925 4TH AVE. STE. 2900, SEATTLE WA 98104 | K&L CAPITAL | E | B |
| NEUBERGER BERMAN 605 THIRD AVE. NEW YORK CITY NY 10158 | MUTUAL FUND - 100% Socially Responsible | E | A |
| WINSLOW GREEN GROWTH/GREEN SOLUTIONS | IRA MUTUAL FUND | D | A |
| COLLEGE SAVINGS IOWA 321 E. 12TH ST. DES MOINES IA 50319 | 529 COLLEGE FUND | E | A |
| SAUL CTRS REIT 1000 SHARES | INVESTMENT | C | A |
| MARRIOTT BONDS, SERIES L SERIES L 16 000 | INVESTMENT | B | A |
| ADOBE - ADBE, 1600 SHARES STOCK | INVESTMENT | D | 0 |
| CISCO - CSCO, 2000 | INVESTMENT | E | A |
| COHERENT - COHR, 400 | INVESTMENT | C | 0 |

Check here if continued on attached sheet.

MAR 13 2013

F-1

COMPANY, ASSOC., GOVERNMENT AGENCY CONTINUED

Name CHAPMAN, WILLIAM H

Page 5

3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS

| C. Name and address of each company, association, government agency | Type of Account or Description of Asset | Asset Value (Use Code) | Income Amount (Use Code) |
|---|---|------------------------|--------------------------|
| EMERSON ELECTRIC - EMR, 600 | INVESTMENT | D | A |
| EMC, 1000 | INVESTMENT | C | 0 |
| GENERAL ELECTRIC - GE, 2400 | INVESTMENT | D | A |
| HBC, 500 SHARES | INVESTMENT | C | A |
| INTEL, INTC, 1500 | INVESTMENT | D | A |
| KIMBERLY CLARK, 600 SHARES | INVESTMENT | D | A |
| MICROSOFT - MSFT, 4000 | INVESTMENT | E | A |
| NICE, 200 | INVESTMENT | B | 0 |
| PFIZER, 800 | INVESTMENT | C | A |
| Abbott, 600 Shares Stock | INVESTMENT | C | A |
| Johnson & Johnson, 235 | INVESTMENT | B | A |
| MMM, 400 | INVESTMENT | C | A |

Check here if continued on attached sheet.

MAR 13 2013

F-1

COMPANY, ASSOC., GOVERNMENT AGENCY CONTINUED.

Name CHAPMAN, WILLIAM H

Page 6

3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS

| C. Name and address of each company, association, government agency | Type of Account or Description of Asset | Asset Value (Use Code) | Income Amount (Use Code) |
|---|---|------------------------|--------------------------|
| PNC, 1200 | INVESTMENT | C | A |
| Berkshire Hathaway 225 | Investment | C | A |
| Bristol Myers 525 | Investment | B | A |
| Conoco Phillips, 225 | Investment | B | A |
| DuPont, 200 | Investment | C | A |
| Finisar 750 | Investment | B | A |
| Ford 1500 | Investment | B | A |
| Kraft 450 | Investment | B | A |
| Paccar 350 | Investment | B | A |
| Pepsi 250 | Investment | B | A |
| Qualcomm 300 | Investment | B | A |
| Schwab 1175 | Investment | B | A |

Check here if continued on attached sheet.

MAR 13 2013

F-1

COMPANY, ASSOC., GOVERNMENT AGENCY CONTINUED

Name CHAPMAN, WILLIAM H

Page 7

3

ASSETS / INVESTMENTS - INTEREST / DIVIDENDS

| C. Name and address of each company, association, government agency | Type of Account or Description of Asset | Asset Value (Use Code) | Income Amount (Use Code) |
|---|---|------------------------|--------------------------|
| Walmart 300 | Investment | B | A |
| Waste Management 500 | Investment | B | A |
| Apple 30 | Investment | B | A |
| Coming | Investment | B | A |
| McDonalds | Investment | B | A |
| Mandelez 375 | Investment | B | A |
| Nordstrom 275 | Investment | B | A |
| Teva | Investment | B | A |
| Total | Investment | B | A |
| Siemens 200 | Investment | C | A |
| US Bank | Investment | C | A |
| Google 25 | Investment | B | A |

Check here if continued on attached sheet.

MAR 13 2013

COMPANY, ASSOC., GOVERNMENT AGENCY CONTINUED

F-1

Name CHAPMAN, WILLIAM H


Page 8

3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS

| C. Name and address of each company, association, government agency | Type of Account or Description of Asset | Asset Value (Use Code) | Income Amount (Use Code) |
|---|---|------------------------|--------------------------|
| Johnson Controls 235 | Investment | B | A |
| Windstream 1,000 | Investment | B | A |

Check here if continued on attached sheet.

MAR 13 2013

PUBLIC DISCLOSURE COMMISSION

 711 CAPITOL WAY RM 206
 PO BOX 40908
 OLYMPIA WA 98504-0908
 (360) 753-1111
 TOLL FREE 1-877-601-2828
 EMAIL: pdc@pdc.wa.gov

PDC FORM
F-1
 SUPPLEMENT
 (1/12)

SUPPLEMENT PAGE
 PERSONAL FINANCIAL AFFAIRS STATEMENT

PROVIDE INFORMATION FOR YOURSELF, SPOUSE, REGISTERED DOMESTIC PARTNER, DEPENDENT CHILDREN AND OTHER DEPENDENTS IN YOUR HOUSEHOLD

| Last Name | First | Middle Initial | DATE |
|-----------|---------|----------------|------------|
| Chapman | William | H | 03-13-2013 |

A

**OFFICE HELD,
 BUSINESS
 INTERESTS:**

Provide the following information if, during the reporting period, you, your spouse, registered domestic partner or dependents

- (1) were an officer, director, general partner, trustee, or 10 percent or more owner of a corporation, non-profit organization, union, partnership, joint venture or other entity; and/or
- (2) were a partner or member of a limited partnership, limited liability partnership, limited liability company or similar entity, including but not limited to a professional limited liability company.

- Legal Name: Report name used on legal documents establishing the entity.
- Trade or Operating Name: Report name used for business purposes if different from the legal name.
- Position or Percent of Ownership: The office, title and/or percent of ownership held.
- Brief Description of the Business/Organization: Report the purpose, product(s), and/or the service(s) rendered.
- Payments from Governmental Unit: If the governmental unit in which you hold or seek office made payments to the business entity concerning which you're reporting, show the purpose of each payment and the actual amount received.
- Payments from Business Customers and Other Government Agencies: List each corporation, partnership, joint venture, sole proprietorship, union, association, business or other commercial entity and each government agency (other than the one you seek/hold office) which paid compensation of \$10,000 or more during the period to the entity. Briefly say what property, goods, services or other consideration was given or performed for the compensation.
- Washington Real Estate: Identify real estate owned by the business entity if the qualifications referenced below are met.

ENTITY NO. 1

Reporting For: Self Spouse Registered Domestic Partner Dependent

LEGAL NAME:

K&L Gates LLP

POSITION OR PERCENT OF OWNERSHIP

2%

TRADE OR OPERATING NAME:

ADDRESS:

925 FOURTH AVENUE, SUITE 2900

SEATTLE

WA 98104

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:

LAW FIRM

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:

Purpose of payments

Amount (actual dollars)

\$ 168

Per diem

PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$10,000 OR MORE:

Agency name:

Purpose of payment (amount not required)

PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$10,000 OR MORE

Customer name:

Purpose of payment (amount not required)

WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$20,000. List street address, assessor parcel number, or legal description and county for each parcel):

Check here if continued on attached sheet

CONTINUE PARTS B AND C ON NEXT PAGES

FOOD TRAVEL SEMINARS

DATE FILED PDC F-1 Supplement

Name Chapman, William H

MAR 13 2013

2

C

FOOD TRAVEL SEMINARS

Complete this section if a source other than your own governmental agency paid for or otherwise provided all or a portion of the following items to you, your spouse, registered domestic partner or dependents, or a combination thereof: 1) Food and beverages costing over \$50 per occasion; 2) Travel occasions; or 3) Seminars, educational programs or other training.

| Date Received | Donor's Name, City and State | Brief Description | Actual Dollar Amount | Value (Use Code) |
|---------------|------------------------------|-------------------------|----------------------|------------------|
| 10-18-2012 | K&L Gates LLP Seattle WA | Travel to San Diego, CA | \$ 1,824.50 | A |
| 10-11-2012 | K&L Gates LLP Seattle WA | Travel to Phoenix, AZ | 1,800 | A |

Check here if continued on attached sheet



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

June 8, 2012

William H. Chapman
7703 Ridgecrest Lane
Mercer Island, WA 98040

Subject: Reporting Modification – calendar year 2011

Dear Mr. Chapman:

Enclosed is a copy of PDC Order No. 3059, granting the reporting modification you requested concerning your Personal Financial Affairs Statement (PDC Form F-1) for the 2011 calendar-year reporting period.

Reporting modifications are granted for one reporting period. If you need to renew your reporting modification request, you must do so each time you file an F-1 report. Please submit your request early enough to allow the Commission time to act on your request before the annual April 15 filing deadline.

Thank you for your cooperation and participation during the reporting modification process. If you have questions, please contact me at (360) 586-4555, toll free at 1-877-601-2828, or by email at kristin.murphy@pdc.wa.gov.

Sincerely,

Kristin Murphy
Political Finance Specialist

Enclosure



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

IN THE MATTER OF THE APPLICATION) PDC No. 3059
OF WILLIAM H. CHAPMAN FOR A) Findings, Conclusions
REPORTING MODIFICATION) and Order
_____)

On May 24, 2012, the application of William H. Chapman, 7703 Ridgecrest Lane, Mercer Island, Washington 98040, for a modification of the reporting requirements of RCW 42.17.241¹ was brought before the Public Disclosure Commission.

Consideration of the request was made pursuant to RCW 42.17A.120² and chapter 390-28 WAC by the Commission. The proceedings were held in Room 206, Evergreen Plaza Building, 711 Capitol Way, Olympia, Washington, 98504. The applicant, William H. Chapman, by letter, requested a renewal of the reporting modification that would exempt him from disclosing on his Personal Financial Affairs Statement the business customers that paid \$10,000 or more during 2011, to K & L Gates, LLP (K & L Gates), a law firm.

The Commission was provided with a certification from Mr. Chapman waiving his personal appearance at the hearing and stating that the facts contained in the request are true and accurate.

FINDINGS OF FACT

Based upon the letter, the Commission makes the following Findings of Fact:

1. Mr. Chapman has previously been granted the requested reporting modification, the most recent being Order No. 3014.
2. Mr. Chapman is Chair of the Recreation and Conservation Funding Board. His appointed term expires in December 2013.
3. Mr. Chapman is a partner with K & L Gates and has less than a 1% ownership interest. He stated that K & L Gates has 41 offices in the United States and internationally, with more than 1,800 attorneys, and more than 30,000 active cases or matter numbers.
4. Mr. Chapman stated that it would cause an undue hardship to disclose the reportable business customers of K & L Gates because to do so would require a manual review of each of the over 30,000 matters/active cases.
5. Mr. Chapman disclosed that K&L Gates received \$1,000 for his per diem from the Recreation and Conservation Funding Board during 2011.

¹ RCW 42.17.241 now codified at RCW 42.17A.710 (effective January 1, 2012).

² RCW 42.17A.120 (effective January 1, 2012) formerly codified at RCW 42.17.370(10):

CONCLUSIONS OF LAW

Having made these Findings of Fact, the Commission makes the following Conclusions of Law:

1. Literal compliance with all the provisions of the reporting requirements of RCW 42.17.241³ would work a manifestly unreasonable hardship on the applicant.
2. Limited suspension or modification of the reporting requirements as specified in the Order would not frustrate the purposes of the Act in this particular case.

ORDER

Having made these Findings of Fact and Conclusions of Law, the Commission issues the following Order:

For the Statement of Personal Financial Affairs required to be filed with the Public Disclosure Commission between January 1 and April 16, 2012:

1. The applicant may satisfy the reporting requirements of RCW 42.17.241(1)(g)(ii)³ by identifying for the appropriate reporting period:
 - a. The name of the reportable business clients⁴ of the law firm for whom the applicant has done legal work⁵;
 - b. Other reportable business clients of the law firm whose interests are significantly affected by the applicant's actions in the applicant's official capacity as Chair for the Recreation and Conservation Funding Board when their identities become known to the applicant or the applicant becomes aware of their identities by any means;
 - c. All governmental clients that have done business with the law firm;⁶
 - d. The names of the reportable business clients of the law firm when the names are listed in Martindale Hubbell, the firm's publicity brochure(s), or the firm's resume, website, or similar promotional materials of the firm; or the names become known to the applicant and (i) the identities are otherwise publicized or referenced in documents open for public inspection at the courts, in administrative hearings, or at other public agencies; or, (ii) the identities have been disclosed in documents made available for public inspection at open

³ RCW 42.17.241 now codified at RCW 42.17A.710 (effective January 1, 2012).

⁴ Reportable business clients are nonindividuals providing compensation of \$10,000 or more during the reporting period.

⁵ Ordinarily, the identity of a client does not fall within the purview of the information protected by the attorney-client privilege unless there is a "strong probability" that the disclosure would convey the substance of a confidential communication between client and attorney. *Splash Design, Inc. v. Lee*, 104 Wn.App. 38, 14 P.3d 879 (2001) (describing Rule of Professional Conduct 1.6 and citing to *Dietz v. Doe*, 131 Wn.2d 835, 935 P.2d 611 (1997)); Tegland, *Washington Practice*, Vol. 5A, § 501.15 (1999); *United States v. Hunton & Williams*, 952 F.Supp. 843 (D.C. 1997) (under federal law, absent special circumstances, identity of a client of a lawyer or law firm is not protected by attorney-client privilege); *C.K. Liew v. Breen*, 640 F.2d 1046 (9th Cir. 1981) (citing to California law for same proposition, and to J. Wigmore, *Evidence* § 2313).

⁶ The names of governmental clients are matters of public knowledge in listings in *Martindale Hubbell*; the firm's publicity brochure(s), websites, or other promotional materials; or the firm's resume. The names of government clients are also matters of public knowledge in records that disclose that the firm is representing the client, including but not limited to documents reflecting payments of public funds from the governmental agency to the law firm; court filings; filings in administrative hearings; and in public records. See definition of public record at RCW 42.17.020(42) and RCW 42.56.010(2).

public meetings of public agencies; or, (iii) the identities have been made a matter of public knowledge in other similar public forums.

2. In all other matters required to be reported, the applicant shall comply in full with the reporting requirements of RCW 42.17/42.17A.

DATED this 8th day of June, 2012.

FOR THE PUBLIC DISCLOSURE COMMISSION

Andrea M. Doyle
Andrea McNamara Doyle
Executive Director

I, Kristin Murphy, certify that I mailed a copy of this order to the Respondent/Applicant at his/her respective address, postage pre-paid on the date stated herein.
Kristin Murphy 6-8-12
Signed Date