

## MODIFICATION REQUEST COVER SHEET

<b>Name of Filer</b>	<b>BENSON D. WONG</b>
<b>Reporting Period</b>	<input checked="" type="checkbox"/> Annual report – calendar year 2015 <input type="checkbox"/> Candidate/Appointee
<b>Type of Request</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>original granted on June 27, 2013</u> <input type="checkbox"/> Renewal with Change
<b>Office Held/Sought &amp; Term</b>	City Council Member, City of Mercer Island Term expires: December, 2017
<b>Application Rule(s)</b>	<input type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(b) <input type="checkbox"/> Personal Residence: WAC 390-28-100(d) <input checked="" type="checkbox"/> Attorney: <a href="#">WAC 390-28-100(1)(e)(i)</a> <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)(a)(c)
<b>Explanation of Rule(s)</b>	<p><b>Lawyers and law firms (when applicant is an incumbent or candidate and acts alone or as part of a governing body, board, or commission).</b> An applicant may be allowed to satisfy the reporting requirements of RCW <a href="#">42.17A.710</a> (1)(g)(ii) and WAC <a href="#">390-24-020</a> by disclosing reportable clients from whom compensation has been paid in excess of the reporting threshold as follows:</p> <p>(A) The names of the business clients for whom the applicant has done legal work;            (B) Other clients of the law firm whose interests are significantly affected by the applicant's actions as an elected or appointed official or whose actions will be affected by the applicant's action should the applicant be elected whose identities become known to the applicant through any means;            (C) The names of the clients of the law firm who are listed in Martindale Hubbell, the firm's resume, web site, or similar promotional materials; and            (D) Governmental clients that have done business with the law firm.</p> <p>An applicant may also be required to disclose all business customers from whom compensation in excess of the reporting threshold has been received whose identities are publicized or referenced in documents open for public inspection at the courts, in administrative hearings, at proceedings conducted by public agencies, or are a matter of public knowledge in other similar public forums. Alternatively, the commission may require an applicant to report only those publicly identifiable customers of which the applicant is aware.</p>
<b>Supporting Documents (attached)</b>	<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) – May 28, 2015
<b>Reason(s) for Modification (as stated by filer)</b>	<ul style="list-style-type: none"> <li>• Mr. Wong is requesting a reporting modification that would exempt him from disclosing the business customers that paid \$12,000 or more during 2015 to Keller Rohrback LLP, a law firm.</li> <li>• Mr. Wong is an attorney with Keller Rohrback serving on its Executive Committee. He stated that his duties involve setting general policy and approving extraordinary</li> </ul>

	<p>contracts. Mr. Wong stated that his ownership interest in the firm is less than 10%.</p> <ul style="list-style-type: none"> <li>• Mr. Wong stated that he is not involved in the day-to-day operation of the firm and that as a partner in the firm he does not have access to reportable clients.</li> <li>• Keller Rohrback LLP is a mid-size law firm in Seattle. The firm has small branch offices in New York City and Santa Barbara, with an affiliated office in Phoenix.</li> <li>• Mr. Wong stated that disclosing the revenue of the firm would adversely affect the firm's competitive position in the legal community.</li> <li>• Keller Rohrback LLP has 118 employees consisting of support staff and lawyers in addition to 28 partners.</li> <li>• Mr. Wong stated that the firm has approximately 150 reportable clients and that disclosing these clients would allow other firms to target these clients in a more strategic manner. In addition, Mr. Wong stated that he believes the clients themselves may suffer competitive disadvantage within their respective areas of business and industries.</li> <li>• Mr. Wong stated that there were no payments made from the City of Mercer Island to Keller Rohrback LLP during 2015.</li> <li>• In his request letter, Mr. Wong provided information in accordance with WAC 390-28-100(1)(e)(i) (previously PDC Interpretation #02-03):       <ol style="list-style-type: none"> <li>1. A listing of the clients he represented and did legal work for Keller Rohrback in 2015;</li> <li>2. A statement that in 2015 Keller Rohrback had no business customers whose interests were significantly affected by his actions on the Mercer Island City Council;</li> <li>3. A listing of the Keller Rohrback clients that were already publicly identified;</li> <li>4. A listing of other governmental customers in Washington that Keller Rohrback did business with in 2015.</li> </ol> </li> </ul>
<p><b>Other Issues</b></p>	<p>Mr. Wong stated that he will recuse himself from any proceedings involving clients of the firm that are before the Mercer Island City Council.</p>
<p><b>Staff Recommendations</b></p>	<p>Approve renewal of the reporting modification with no change.</p>