

MODIFICATION REQUEST COVER SHEET

Name of Filer	BENSON D. WONG
Reporting Period	<input checked="" type="checkbox"/> Annual report – calendar year 2019 <input type="checkbox"/> Candidate/Appointee
Type of Request	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>original granted on June 27, 2013</u> <input checked="" type="checkbox"/> Full Commission Approval – <u>March 28, 2019</u> <input type="checkbox"/> Renewal with Change
Office Held/Sought & Term	City Council Member, City of Mercer Island Term expires: December 2021
Application Rule(s)	<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: 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)(a)(c)
Explanation of Rule(s)	<p>Lawyers and law firms (when applicant is an incumbent or candidate and acts alone or as part of a governing body, board, or commission). An applicant may be allowed to satisfy the reporting requirements of RCW 42.17A.710 (1)(g)(ii) and WAC 390-24-020 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>
Supporting Documents (attached)	<input checked="" type="checkbox"/> Current F-1 (filed March 10, 2020) <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Prior order (if renewal) – March 28, 2019
Reason(s) for Modification (as stated by filer)	<ul style="list-style-type: none"> Mr. Wong is requesting a renewal of a reporting modification that would exempt him from disclosing the business customers that paid \$12,000 or more during 2019 to Keller Rohrback LLP, a law firm.

	<ul style="list-style-type: none">• 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 contracts. Mr. Wong stated that his ownership interest in the firm is less than 10%.• Mr. Wong stated in previous requests, that disclosing the revenue of the firm would adversely affect the firm's competitive position in the legal community 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.
Other Issues	<p>Mr. Wong has provided a list of his clients, clients whose interests would be significantly affected by his actions as a Council Member of the City of Mercer Island, clients who are identified in court files or other public sources, and the firm's governmental clients. He has confirmed that Keller Rohrback LLP received no payments from the City of Mercer Island during 2019.</p> <p>Mr. Wong has agreed to recuse himself if a matter came before him involving a conflict of interest between Keller Rohrback LLP and his duties as a City Council Member of the City of Mercer Island.</p> <p>Mr. Wong has reviewed his initial reporting modification request and any subsequent renewal requests and has certified that there are no changes to the facts related to his request.</p>