

MODIFICATION REQUEST COVER SHEET

Name of Filer	RAYMOND LAWTON
Reporting Period	<input checked="" type="checkbox"/> Annual report – calendar year 2015 <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 July 24, 2014</u> <input type="checkbox"/> Renewal with Change
Office Held/Sought & Term	Member, WA ST Student Achievement Council Term expires: To be determined by Independent Colleges of Washington
Application Rule(s)	<input checked="" type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(b) <input type="checkbox"/> Personal Residence: WAC 390-28-100(d) <input 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>Income and ownership interests. An applicant may be exempted from reporting the information otherwise required by RCW 42.17A.710 (1)(f) and (g), if:</p> <p>(i) Public disclosure would violate any legally recognized confidential relationship;</p> <p>(ii) The information does not relate to a business entity which would be subject to the regulatory authority of the office sought or held by the applicant in whole or in part;</p> <p>(iii) Such reporting would present a manifestly unreasonable hardship to the applicant including but not limited to adversely affecting the competitive position of an entity in which the applicant had an interest of ten percent or more as described in RCW 42.17A.120; and</p> <p>(iv) The interest in question would present no actual or potential conflict with the performance of the duties of the office sought or held.</p>
Supporting Documents (attached)	<input checked="" type="checkbox"/> Current F-1 <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Prior order (if renewal) – <u>Order #3213</u>
Reason(s) for Modification (as stated by filer)	<ul style="list-style-type: none"> • Mr. Lawton is requesting a reporting modification that would exempt him from disclosing the business customers that paid \$12,000 or more during calendar year 2015, to Rumpeltes & Lawton, LLC. • Mr. Lawton is a partner of Rumpeltes & Lawton, LLC with an ownership interest of 50%. • Mr. Lawton stated that he is involved in the day to day operations of Rumpeltes & Lawton, LLC. • Mr. Lawton stated that Rumpeltes & Lawton, LLC is a consulting firm focused on preparing owners to exit their businesses successfully. It is located in Spokane. • Mr. Lawton stated that Rumpeltes & Lawton, LLC has annual sales of approximately \$80,000 to \$120,000.

	<ul style="list-style-type: none">• Mr. Lawton stated that five business customers of Rumpeltes & Lawton, LLC would meet the reporting threshold. He also stated that there are no reportable governmental customers.• Mr. Lawton stated that Rumpeltes & Lawton, LLC is a privately held company and that a list of its customers is not publically available.• Mr. Lawton stated that Rumpeltes & Lawton, LLC signs a confidentiality statement with all clients due to the sensitive nature of the services it provides. If it were to be publically known that a client has retained their services, it may result in serious financial damage to the clients.• Mr. Lawton believes disclosing the reportable business customers would put Rumpeltes & Lawton, LLC. At a serious competitive disadvantage.
Other Issues	Mr. Lawton disclosed that if any matter came before him involving Rumpeltes & Lawton, LLC, or its customers, that he would recuse himself.
Staff Recommendations	Approve renewal of the modification with no change.