

MODIFICATION REQUEST COVER SHEET

Name of Filer	BARRE SEIBERT
Reporting Period	<input checked="" type="checkbox"/> Annual report – calendar year 2016 <input type="checkbox"/> Candidate/Appointee report
Type of Request	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – original granted on March 23, 2006 <input type="checkbox"/> Renewal with Change
Office Held & Term	City Council, City of Clyde Hill Elected term expires January, 2019
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"/> Letter <input checked="" type="checkbox"/> Prior order (if renewal) – March 15, 2016
Reason(s) for Modification (as stated by filer)	<ul style="list-style-type: none"> • Mr. Seibert is requesting a renewal of a reporting modification that exempts him from disclosing the business and other governmental customers that paid \$12,000 or more during 2016 to Tootsie Roll Industries, Inc. (Tootsie Roll). • Mr. Seibert is a Director of Tootsie Roll. He stated that neither he nor his spouse had an ownership interest of 10% or more in the company during 2016. He said he is not involved in day-to-day

	<p>operations of the company and does not have direct access to customer information.</p> <ul style="list-style-type: none">• Mr. Seibert stated that Tootsie Roll is an international company engaged in the manufacture and sale of confectionary products (such as Tootsie Rolls, Mason Dots, Junior Mints, etc.) to approximately 15,000 retailers & distributors in the United States and foreign countries. The company had annual sales of over \$500 million in 2016.• Mr. Seibert indicated that compiling the customer information would be a hardship on the company. He also stated that the candy industry is highly competitive and that Tootsie Roll considers its customer lists to be proprietary in nature.
Other Issues	<ul style="list-style-type: none">• Mr. Seibert provided the name of one business customer in his request letter, Wal-Mart Stores, Inc. which he said was disclosed in a filing with the SEC as being approximately of 23.7% of sales.• Mr. Seibert stated that Tootsie Roll Industries, Inc. does no business with the City of Clyde Hill, and made no payments to them in 2016.
Staff Recommendations	Approve renewal of the reporting modification with no change.