

MODIFICATION REQUEST COVER SHEET

Name of Filer	DAVID ZEECK
Reporting Period	<input checked="" type="checkbox"/> Annual report – calendar year 2019 <input type="checkbox"/> Candidate/Appointee report
Type of Request	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>original granted April 2, 2018</u> <input checked="" type="checkbox"/> Full Commission Approval – <u>March 28, 2019</u> <input type="checkbox"/> Renewal with Change
Office Held & Term	Regent/Trustee, University of Washington Current term expires, September 30, 2023
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 checked="" 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>Applicants whose spouse or registered domestic partner creates a reporting obligation for the applicant. When an applicant is required to report the activities of an entity solely because the applicant's spouse or registered domestic partner held an office, directorship, general partnership or ownership interest in the entity and the applicant does not have direct knowledge of the information that must be reported, the applicant may be allowed to satisfy the disclosure requirements of RCW 42.17A.710 (1)(g)(ii) and WAC 390-24-020 by disclosing reportable customers from whom compensation in excess of the disclosure threshold established under RCW 42.17A.710 (1)(g)(ii) has been received as follows:</p> <p>(A) All payments made by the agency or jurisdiction in which the applicant seeks or holds office to the entity;</p> <p>(B) The business and other governmental customers or clients of the applicant's spouse/domestic partner and of the entity of which the applicant is aware; and</p> <p>(C) Any other business and other governmental customers or clients of the entity whose identities are known to the applicant and whose interests are significantly affected by the agency or jurisdiction in which the applicant seeks or holds office. The commission may apply (e)(i) through (iii) of this subsection when the applicant's spouse/domestic partner is a lawyer, judge, or motor vehicle dealer.</p> <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;</p> <p>(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;</p> <p>(C) The names of the clients of the law firm who are listed in Martindale Hubbell, the firm's resume, website, or similar promotional materials; and</p> <p>(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>
<p>Supporting Documents (attached)</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Current F-1 (filed January 13, 2020) <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Supplemental Information on Clients – February 19, 2020 <input checked="" type="checkbox"/> Prior order (if renewal) – March 28, 2019
<p>Reason(s) for Modification (as stated by filer)</p>	<ul style="list-style-type: none"> • Mr. Zeeck is requesting renewal of a reporting modification that would exempt him from disclosing the business customers that paid \$12,000 or more during 2019 to Gordon Thomas Honeywell Malanca Peterson and Daheim, LLP (Gordon Thomas Honeywell), a law firm. • Mr. Zeeck's spouse, Valarie S. Zeeck, is a partner of Gordon Thomas Honeywell in the Tacoma/Seattle area. • In his original request, Mr. Zeeck disclosed all reportable business or other governmental customers of Gordon Thomas Honeywell of which he was aware. • Mr. Zeeck stated that he is not involved in the day-to-day operations of Gordon Thomas Honeywell, that he is not involved in hiring attorneys for the University of Washington, and it is unreasonable to ask a law firm to list all clients and amounts collected.
<p>Other Issues</p>	<p>Mr. Zeeck has stated that he will not disclose the purpose of all payments with the actual dollar amounts received by Gordon Thomas Honeywell from the University of Washington, but the University is not a client of Gordon Thomas Honeywell.</p>

Mr. Zeeck stated that it is unreasonable to ask a law firm to list all clients and amounts collected, but is aware, "of some clients including Pacific Lutheran University; Community Health Care; the Port of Tacoma; the Tacoma Pierce County Chamber of Commerce, The News Tribune, SSA Marine; and misc. others listed on firm website but personally unknown to applicant."

Mr. Zeeck has agreed to recuse himself if a matter came before him involving a conflict of interest between Gordon Thomas Honeywell and his duties as a University of Washington Regent.

Mr. Zeeck 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.