

## MODIFICATION REQUEST COVER SHEET

<b>Name of Filer</b>	<b>DONALD BENTON</b>
<b>Reporting Period</b>	<input checked="" type="checkbox"/> Annual report – calendar year 2013 <input type="checkbox"/> Candidate/Appointee report:
<b>Type of Request</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>original granted on October 24, 2013.</u> <input type="checkbox"/> Renewal with Change
<b>Office Held/Sought &amp; Term</b>	State Senator, 17 <sup>th</sup> Legislative District Current elected term expires December, 2017
<b>PDC Protocol</b>	<input type="checkbox"/> Attorney: Interpretation #02-03 <input type="checkbox"/> Judge / Judicial Candidate: Interpretation #02-04 <input type="checkbox"/> Automobile Dealership: Interpretation #02-05 <input type="checkbox"/> Spousal: Interpretation #02-06 <input checked="" type="checkbox"/> WAC 390-28-100(1)(b) & (1)(c) – (Income & Ownership Interest)
<b>Supporting Documents (attached)</b>	<input checked="" type="checkbox"/> Current F-1 <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Prior order (if renewal) – <u>Order #3135</u>
<b>Reason(s) for Modification (as stated by filer)</b>	<ul style="list-style-type: none"> <li>• Mr. Benton is requesting a reporting modification that would exempt him from disclosing the business customers that made payments of \$10,000 or more to National Advertising Consultants, Inc / The Benton Group, during 2013.</li> <li>• Mr. Benton stated that The Benton Group is a marketing and advertising company located in Washington. Mr. Benton stated that has been actively running the company for 25 years until May 2012 when his full time management ceased. He stated that he retained the title of CEO and chief trainer for the company even after his involvement in the day-to-day operations ceased. Mr. Benton stated that his wife also has an ownership interest in The Benton Group.</li> <li>• Mr. Benton stated that The Benton Group has approximate average sales of \$600,000 in any given year and employs two to five staff.</li> <li>• Mr. Benton stated that The Benton Group has approximately 600 total clients with 120 of these clients paying \$10,000 or more during the last three calendar years.</li> <li>• Mr. Benton stated that the primary focus of the company is sales consulting and revenue program consulting and training for television stations and media companies worldwide. He stated that listing these customers would allow the company's competitors to target these customers and offer cheaper options.</li> <li>• Mr. Benton stated that the company's smaller focus is media buying and annual planning for three professional clients in the law, medical, and dental fields. He stated that currently The Benton Group has no professional clients doing any business in the State of Washington.</li> <li>• Mr. Benton stated that The Benton Group's database does not separate customers based on the dollar amount of their contracts and to compile this information would create a significant burden on the company's small staff. In addition, he stated releasing a complete list would affect their client's privacy.</li> </ul>

<b>Staff Recommendations</b>	Approve renewal of the reporting modification with no change.
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