

## MODIFICATION REQUEST COVER SHEET

<b>Name of Filer</b>	<b>RAYMOND LAWTON</b>
<b>Reporting Period</b>	<input checked="" type="checkbox"/> Annual report – calendar year 2014 <input type="checkbox"/> Appointee report:
<b>Type of Request</b>	<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
<b>Office Held/Sought &amp; Term</b>	Member, WA ST Student Achievement Council Term expires: To be determined by Independent Colleges of Washington
<b>Application Rule(s)</b>	<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)
<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 #3204</u>
<b>Reason(s) for Modification (as stated by filer)</b>	<ul style="list-style-type: none"> <li>• Mr. Lawton is requesting a reporting modification that would exempt him from disclosing the business customers that paid \$12,000 or more during the previous 12 months, when he was appointed to Rumpeltes &amp; Lawton, LLC.</li> <li>• Mr. Lawton is a partner of Rumpeltes &amp; Lawton, LLC with an ownership interest of 50%.</li> <li>• Mr. Lawton stated that he is involved in the day to day operations of Rumpeltes &amp; Lawton, LLC.</li> <li>• Mr. Lawton stated that Rumpeltes &amp; Lawton, LLC is a consulting firm focused on preparing owners to exit their businesses successfully. It is located in Spokane.</li> <li>• Mr. Lawton stated that Rumpeltes &amp; Lawton, LLC has annual sales of approximately \$80,000 to \$120,000.</li> <li>• Mr. Lawton stated that five business customers of Rumpeltes &amp; Lawton, LLC would meet the reporting threshold. He also stated that there are no reportable governmental customers.</li> <li>• Mr. Lawton stated that Rumpeltes &amp; Lawton, LLC is a privately held company and that a list of its customers is not publically available.</li> <li>• Mr. Lawton stated that Rumpeltes &amp; 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.</li> <li>• Mr. Lawton believes disclosing the reportable business customers would put Rumpeltes &amp; Lawton, LLC. At a serious competitive disadvantage.</li> </ul>

<b>Other Issues</b>	Mr. Lawton disclosed that if any matter came before him involving Rumpeltes & Lawton, LLC, or its customers, that he would recuse himself.
<b>Staff Recommendations</b>	Approve renewal of the modification with no change.