

MODIFICATION REQUEST COVER SHEET

Name of Filer	ROBERT AMENN
Reporting Period	<input type="checkbox"/> Annual report <input checked="" type="checkbox"/> Candidate report
Type of Request	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Full Commission Approval <input type="checkbox"/> Renewal with Change
Office Held/Sought & Term	Candidate for State Representative, Legislative District 12 Candidate in 2022
Application Rule(s)	<input checked="" type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(b) <input checked="" type="checkbox"/> Personal Residence: WAC 390-28-100(1)(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 checked="" type="checkbox"/> Other: WAC 390-28-100(1)(e)
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 that serves a legitimate business interest;</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> <p>Personal residence - Real property. Regarding reporting the information otherwise required by RCW 42.17A.710 (1)(h) through (k):</p> <p>(i) Under WAC 390-24-200, the filer must list the street address of each parcel, the assessor's parcel number, the abbreviated legal description appearing on property tax statements, or the complete legal description. Each property description must be followed by the name of the county in which the property is located.</p> <p>(ii) No modification will be necessary if the filer describes the real property using one of the alternatives in WAC 390-24-200, plus the name of the county. Judges, prosecutors, or sheriffs may describe a personal residence in the alternative manner provided under</p>

	<p>RCW 42.17A.710(2), and WAC 390-24-200 without a modification. (iii) A modification will be required if the filer seeks some other means to describe reportable real property including the personal residence of the filer. The commission may consider and grant such a modification to amend the description of a residential address to the extent necessary to protect the applicant or an immediate family member who has received a threat, has obtained a no contact order, or has presented a similar personal safety concern.</p> <p>Other. An applicant may be exempted from reporting information otherwise required under RCW 42.17A.710 which would constitute a manifestly unreasonable hardship in a particular case, when the circumstances presented would not indicate any actual or potential conflict with the proper performance of the duties of the office sought or held.</p>
<p>Supporting Documents (attached)</p>	<p><input checked="" type="checkbox"/> Modification Application</p>
<p>Reason(s) for Modification (as stated by filer)</p>	<ul style="list-style-type: none"> • Robert Amenn is requesting a reporting modification that would exempt him from disclosing: (1) business customers of entities that paid \$12,000 or more; (2) his residential address; and (3) other personal information including his income, assets, and debt on his Financial Affairs Statement (F-1 report) at such future time when the F-1 is filed. <p><u>Business Customers, Income, Assets & Debt</u></p> <ul style="list-style-type: none"> • Mr. Amenn stated that he has been involved in the tech startup ecosystem since the mid 1990's including being employed by startups, founding them and as an investor. He stated that he is currently employed by one such entity and is in the process of investing in others. In addition, he currently has interests in several startups and is launching a new one. • Mr. Amenn stated that the literal application of the requirement to provide income, assets, debt and business interests information would cause unreasonable hardship and harm. • Mr. Amenn stated that he believes disclosure of the specific financial explanation of his involvement with startups will allow anyone to understand the total resources he has at his disposal as

	<p>well as understanding his diverse interests, could materially impact the raising of Series A funding for the startup he is employed by, and prevent funding or participation in current and future ventures particularly the new venture he is currently in the process of launching.</p> <ul style="list-style-type: none">• In his application, Mr. Amenn stated that his business interests have no government customers. <p><u>Residential Address</u></p> <ul style="list-style-type: none">• Mr. Amenn stated that as a former public official he received personal threats to cause harm to him, his family and his pets. He believes these individuals still harbor animosity towards him and, if were elected, may act on these threats.
Other Issues	<p>PDC staff have informed Mr. Amenn of the residential address alternatives set forth in WAC 390-24-200 and of the requirement to submit the F-1 report as a 2022 candidate.</p> <p>Mr. Amenn's records would be exempt from public disclosure if the Commission finds in accordance with RCW 42.17A.120 and WAC 390-28-080 that disclosure of such information would present a personal risk to a reasonable person.</p>