 <p>SEEC SEATTLE ETHICS & ELECTIONS COMMISSION</p>	<p>File with: Seattle City Clerk PO BOX 94728 Seattle, WA 98124-4728 Questions: (206) 684-8500 (206) 615-1248 polly.grow@seattle.gov</p>	<p>SEEC FORM F-1 (7/18)</p>	<p>SEEC DOLLAR CODE AMOUNT</p> <p>(1) \$0 -- \$999</p> <p>(2) \$1,000 -- \$4,999</p> <p>(3) \$5,000 -- \$9,999</p> <p>(4) \$10,000 -- \$24,999</p> <p>(5) \$25,000 -- \$99,999</p> <p>(6) \$100,000 -- \$199,999</p> <p>(7) \$200,000 -- \$999,999</p> <p>(8) \$1,000,000 -- \$4,999,999</p> <p>(9) \$5,000,000 or more</p>	<p>PERSONAL FINANCIAL AFFAIRS STATEMENT</p>
<p>Deadlines: Incumbent elected and appointed officials -- by April 15. Candidates and others -- within two weeks of becoming a candidate or being newly appointed to a position.</p> <p>SEND REPORT TO Seattle City Clerk</p>				

"immediate family" means: (a) a spouse or domestic partner, or (b) a parent, parent of a spouse or domestic partner, child, child of spouse or domestic partner, sibling, uncle, aunt, cousin, niece or nephew, if that person either resides with or is a dependent on the Covered Individual's most recently filed federal income tax return. SMC 4.16.080

Last Name Rivera	First Maritza	Middle Initial	Names of immediate family members. If there is no reportable information to disclose for dependent children, or other dependents living in your household, do not identify them. Do identify your spouse or domestic partner. Daniel Kully
Mailing Address (Use PO Box or Work Address) *			
6276 21st Avenue NE			
City Seattle	County King	Zip + 4 98115	

Filing Status (Check only one box.) <input type="checkbox"/> An elected or appointed official filing annual report <input type="checkbox"/> Final report as an elected official. Term expired: _____ <input checked="" type="checkbox"/> Candidate running in an election: month <u>August</u> year <u>2023</u> <input type="checkbox"/> Newly appointed to an elective office	Office Held or Sought Office title: Select Office Position number: Pos/Dist. No. Term begins: <u>Jan 2024</u> ends: <u>Dec 2027</u>
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1	INCOME	List each employer, or other source of income (pension, social security, legal judgment, etc.) from which you or an immediate family member, received compensation, in any form, of \$2,400 or more during the period. Include stock options received during the reporting period that had a value of more than \$2,400. (Report interest and dividends in Item 3.)		
Show Self (S) Spouse (SP/DP) Dependent (D)	Name and Address of Employer or Source of Compensation	Occupation or How Compensation Was Earned	Amount: (Use Code)	
Self	City of Seattle Office of Arts & Culture	Deputy Director	(6)	
SP	Kully Maeder Muir, Seattle, WA	Partner	(8)	
SP	Two Degrees Live, Seattle WA	Partner	(7)	
_____			()	
Check Here <input type="checkbox"/> if continued on attached sheet				

2	REAL ESTATE	List street address, assessor's parcel number, or legal description AND county for each parcel of Washington real estate with value of over \$12,000 in which you or an immediate family member held a personal financial interest during the reporting period. (Show partnership, company, etc. real estate on F-1 supplement.)			
Property Sold or Interest Divested	Assessed Value (Use 1-9 Code)	Name and Address of Purchaser		Nature and Amount (Use Code) of Payment or Consideration Received	
	()			()	
	()			()	
Property Purchased or Interest Acquired		Creditor's Name/Address	Payment Terms (eg. 20 yrs at 4.3%)	Security Given	Mortgage Amount - (Use Code) Original Current
	()				() ()
	()				() ()
All Other Property Entirely or Partially Owned					
6276 21st Avenue NE, King	(8)	Freedom Mortgage, 951 Yamato Rd, BocaRaton,			(7) (7)
6311D 9th Avenue NE, King	(7)	Freedom Mortgage, 951 Yamato Rd.			(7) (7)
Check here <input type="checkbox"/> if continued on attached sheet					

CONTINUE ON NEXT PAGE

3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS

List bank and savings accounts, insurance policies, stock, bonds and other intangible property (including but not limited to stock options) held during the reporting period.

A. Name and address of each bank or financial institution in which you or an immediate family member had an account over \$24,000 at any time during the report period.	Type of Account or Description of Asset	Asset Value (Use 1-9 Code)	Income Amount (Use 1-9 Code)
B. Name and address of each insurance company where you or an immediate family member had a policy with a cash or loan value over \$24,000 during the period.	Charles Schwab Checking, 3000 Schwab Way, Westlake TX 76262	(6)	(1)
C. Name and address of each company, association, government agency, etc. in which you or an immediate family member, owned or had a financial interest worth over \$2,400. Include stocks, bonds, ownership, retirement plan, IRA, notes, stock options, and other intangible property. If you or your immediate family member had decision making authority regarding individual assets/investments list each asset or investment, the value and any income amount. EXAMPLE: If you self-directed an investment account identify each stock or other asset in that account. Stock shall be reported by market value at the time of reporting.	N/A	()	()
	Charles Schwab Joint Tenant Brokerage Westlake, TX	(7)	(1)
	Wells Fargo Brokerage, 420 Montgomery St. San Francisco, CA 94104	()	()
		()	()
		(5)	(1)

Check here if continued on attached sheet.

4 CREDITORS

List each creditor you or an immediate family member owed \$2,400 or more any time during the period. Don't include retail charge accounts, credit cards, or mortgages or real estate reported in Item 2.

AMOUNT
(USE 1-9 CODE)

Creditor's Name and Address	Terms of Payment (eg. 6 years at 5.25%)	Security Given	original	current
			()	()
			()	()

Check here if continued on attached sheet.

5 NET WORTH

Enter your estimated net worth.

Enter Dollar Amount

\$ 4,200,000

6 All filers answer questions A thru D below. If the answer is YES to any of these questions, the F-1 Supplement must also be completed as part of this report. If all answers are NO and you are a candidate or an appointee to a vacant elective office filing your initial report, no F-1 Supplement is required.

Incumbent elected officials filing an annual financial affairs report also must answer question E. An F-1 Supplement is required of these officeholders unless all answers to questions A thru E are NO.

- A. At any time during the reporting period were you and/or an immediate family member (1) an officer, director, general partner or trustee of any corporation, company, union, association, joint venture or other entity or (2) a partner or member of any limited partnership, limited liability partnership, limited liability company or similar entity including but not limited to a professional limited liability company? Y If yes, complete Supplement, Part A.
- B. Did you and/or an immediate family member have an ownership of 10% or more in any company, corporation, partnership, joint venture or other business at any time during the reporting period? Y If yes, complete Supplement, Part A.
- C. Did you and/or an immediate family member own a business at any time during the reporting period? Y If yes, complete Supplement, Part A.
- D. Did you and/or an immediate family member prepare, promote or oppose state legislation, rules, rates or standards for compensation or deferred compensation (other than pay for a currently-held public office) at any time during the reporting period? N If yes, complete Supplement, Part B.
- E. **Only for Persons Filing Annual Report.** Regarding the receipt of items not provided or paid for by your governmental agency during the previous calendar year: 1) Did you, and/or an immediate family member accept a gift of food or beverages costing over \$50 per occasion? ___ or 2) Did any source other than your governmental agency provide or pay in whole or in part for you and/or an immediate family member to travel or to attend a seminar or other training? ___ If yes to either or both questions, complete Supplement, Part C.

ALL FILERS EXCEPT CANDIDATES. Check the appropriate box.

I hold a local elected office. I have read and am familiar with SMC 2.04.300 regarding the use of public facilities in campaigns.

Contact Telephone: (____) _____ *

Email: _____ (work)*

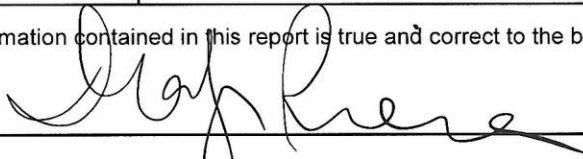
Email: _____ (Home) Optional

CERTIFICATION: I certify under penalty of perjury that the information contained in this report is true and correct to the best of my knowledge.

March 23, 2023

Date

Signature





File with: Seattle City Clerk
 PO BOX 94728
 Seattle, WA 98124-4728
 Questions: (206) 684-8500
 (206) 615-1248
 Polly.Grow@Seattle.gov

SEEC FORM
F-1
 SUPPLEMENT
 (7/18)

SUPPLEMENT PAGE
 PERSONAL FINANCIAL AFFAIRS STATEMENT

PROVIDE INFORMATION FOR YOU AND ANY IMMEDIATE FAMILY MEMBERS

Last Name Rivera	First Maritza	Middle Initial	DATE March 18, 2023
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A

**OFFICE HELD,
 BUSINESS
 INTERESTS:**

Provide the following information if, during the reporting period, you or any immediate family member

- (1) were an officer, director, general partner, trustee, or 10 percent or more owner of a corporation, non-profit organization, union, partnership, joint venture or other entity; and/or
- (2) were a partner or member of a limited partnership, limited liability partnership, limited liability company or similar entity, including but not limited to a professional limited liability company.

- Legal Name: Report name used on legal documents establishing the entity.
- Trade or Operating Name: Report name used for business purposes if different from the legal name.
- Position or Percent of Ownership: The office, title and/or percent of ownership held.
- Brief Description of the Business/Organization: Report the purpose, product(s), and/or the service(s) rendered.
- Payments from Governmental Unit: If the governmental unit in which you hold or seek office made payments to the business entity concerning which you're reporting, show the purpose of each payment and the actual amount received.
- Payments from Business Customers and Other Government Agencies: List each corporation, partnership, joint venture, sole proprietorship, union, association, business or other commercial entity and each government agency (other than the one you seek/hold office) which paid compensation of \$12,000 or more during the period to the entity. Briefly say what property, goods, services or other consideration was given or performed for the compensation.
- Washington Real Estate: Identify real estate owned by the business entity if the qualifications referenced below are met.

ENTITY NO. 1

Reporting For: Self Spouse
 Registered Domestic Partner Dependent

LEGAL NAME: Kully Hall LLC

POSITION OR PERCENT OF OWNERSHIP

TRADE OR OPERATING NAME: Kully Maeder Muir or KMM Strategies 100%

ADDRESS: 401 2nd Avenue South, Suite 307, Seattle, WA. 98104

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:

Political and Media Consulting Practice

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:
 Purpose of payments

Amount (actual dollars)

\$ 0

PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$12,000 OR MORE:
 Agency name:

Purpose of payment (amount not required)

PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$12,000 OR MORE
 Customer name:

Purpose of payment (amount not required)

Please see attachment for list. Purpose same for all customers.

Political Consultant Services

WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$24,000. List street address, assessor parcel number, or legal description and county for each parcel):

Check here if continued on attached sheet

CONTINUE PARTS B AND C ON NEXT PAGE

Name

ENTITY NO. 2

Reporting For: Self Spouse

Registered Domestic Partner Dependent

LEGAL NAME: Two Degrees Live, LLC

POSITION OR PERCENT OF OWNERSHIP

TRADE OR OPERATING NAME: Two Degrees

51%

ADDRESS: 401 Second Avenue South, Suite 407, Seattle, WA. 98104

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:

Climate Communications and Creative Strategies Firm

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:

Purpose of payments

Amount (actual dollars)

\$0

PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$12,000 OR MORE:

Agency name:

Purpose of payment (amount not required)

PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$12,000 OR MORE

Customer name:

Purpose of payment (amount not required)

1. Glass Packing Institute and 2. Northwest River Partners

Communications Services

WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$24,000. List street address, assessor parcel number, or legal description and county for each parcel):

Check here if continued on attached sheet

B LOBBYING: List persons for whom you, or any immediate family member, lobbied or prepared state legislation or state rules, rates, or standards for compensation or deferred compensation. Do not list pay from government body in which you are an elected official or professional staff member.

Person to Whom Services Rendered	Description of Legislation, Rules, Etc.	Compensation (Use Code 1- 9)
		()
		()
		()

Check here if continued on attached sheet

C FOOD TRAVEL SEMINARS Complete this section if a source other than your own governmental agency paid for or otherwise provided all or a portion of the following items to you, your spouse, registered domestic partner or dependents, or a combination thereof: 1) Food and beverages costing over \$50 per occasion; 2) Travel occasions; or 3) Seminars, educational programs or other training.

Date Received	Donor's Name, City and State	Brief Description	Actual Dollar Amount	Value (Use Code1-9)
			\$	(5)
				(1)
				()

Check here if continued on attached sheet

Information Continued

F-1 Supplement

Name

ENTITY NO. 3 Reporting For: Self Spouse

LEGAL NAME: **Sound View Strategies** Registered Domestic Partner Dependent

TRADE OR OPERATING NAME: POSITION OR PERCENT OF OWNERSHIP

ADDRESS: **401 2nd Avenue South, Suite 307, Seattle, WA. 98104** **25%**

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:

Public Affairs and Communications Practice

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:

Purpose of payments	Amount (actual dollars)
Political Consultant Services	\$0

PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$12,000 OR MORE:

Agency name:	Purpose of payment (amount not required)

PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$12,000 OR MORE

Customer name:	Purpose of payment (amount not required)

WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$24,000. List street address, assessor parcel number, or legal description and county for each parcel):

B LOBBYING: (Continued)

Person to Whom Services Rendered	Description of Legislation, Rules, Etc.	Compensation (Use Code 1-9)
		()
		()
		()

C FOOD TRAVEL SEMINARS (continued)

Date Received	Donor's Name, City and State	Brief Description	Actual Dollar Amount	Value (Use Code 1-9)
			\$	()
				()
				()

Assets:

<u>A. Bank Accounts:</u>	Asset Value	Income Amount
Wells Fargo Checking 420 Montgomery Street San Francisco, CA 94104	(5)	(1)
Wells Fargo – 2nd Checking 420 Montgomery Street San Francisco, CA 94104	(5)	(1)
BEUC 12770 Gateway Drive Tukwila, WA 98168	(5)	(1)
<u>C. Investments:</u>		
<u>IRA:</u>		
Charles Schwab 3000 Schwab Way Westlake, TX 76262	(7)	(1)
<u>Employer Retirement System Account:</u>		
Seattle City Employees' Retirement System (SCERS) FAS Treasury Cashiers, P.O. Box 94766 Seattle, WA 98124-7066	(5)	(5)
<u>Self-Directed Investments:</u>		
PFE – Pfizer	(5)	(1)
F - Ford Motor Company	(5)	(1)
WFC - Wells Fargo	(5)	(1)
JWN – Nordstrom	(5)	(1)
BRK-B - Berkshire Hathaway	(5)	(1)
PTON – Peloton	(5)	(1)
<u>529 Accounts:</u>		
College Savings Plans (2 accounts) Charles Schwab 3000 Schwab Way Westlake, TX. 76262	(7) combined total	(1)

List of Business Customers:

For Kully Maeder Muir:

Adam for Colorado

Affordable Homes for San Francisco Now
Aguilar for Congress
Alex Lee IE
Andrew Kalloch for Congress
Arizonans for Sanity
Asian Pacific Islander Leadership PAC
Brooke Jenkins for District Attorney 2022
California Apartment Association Housing Solutions Committee
California Young Democrats
Concerned Parents Supporting the Recall of Collins, Lopez, and Moliga
DeBene for Congress
Elect Ellen Rosenblum for Attorney General
Emily Beach for Congress
Evan McMullin for US Senate
Freedom to Prosper
Joaquin Torres for Assessor 2022
Keep Californians Working (CA-AD20)
Lily Mei
Marie Perez for Congress
Marilyn Strickland for Congress Washington
Marilyn Strickland, Official Office
Matt Dorsey for Supervisor
Patty Murray for Senate
Paula Villescaz for CA State Senate
Protect Our Voice and Vote (No on Prop H)
Raul Peralez for Mayor
San Diego DA Summer Stephan
San Franciscans against new taxes, no on M and O
San Franciscans for Public Safety Supporting the Recall of Chesa Boudin
Santa Clara IE / Lisa Gillmor
Save JFK Promenade Committee
Schrader for Congress (OR)
SF Transportation Board aka Prop A
Vicky Cayetano for HI Governor

Washington State Public Disclosure Commission
Personal Financial Affairs Statement
Reporting Modification Application and Certification

Application Instructions

Request for exemption from reporting **business and governmental customers**
pursuant to RCW 42.17A.120 and WAC 390-28-100

State law allows filers of the F-1 Personal Financial Affairs Statement to seek a modification or suspension of reporting some information. RCW 42.17A.120 states in part:

*The commission may suspend or modify any of the reporting requirements of this chapter if it finds that literal application of this chapter works a **manifestly unreasonable hardship** in a particular case and the suspension or modification **will not frustrate the purposes of this chapter**. The commission may suspend or modify reporting requirements only after a hearing is held and the suspension or modification receives approval. The commission shall act to suspend or modify any reporting requirements only to the extent necessary to substantially relieve the hardship. (Emphasis added)*

To request a modification:

- (1)** Complete your Personal Financial Affairs Statement (F- 1) (when asked about business or governmental customers, list only those that would be reportable if the Commission grants the modification. Answer "no" if there would be no reportable payments/clients);
- (2)** Answer all applicable questions on this application. All applicants **must** complete questions #1 and #4;
- (3)** Include an email address for the PDC to use for correspondence regarding your request;
- (4)** Sign the certification, and
- (5)** Return this application, the signed certification (if waiving personal appearance at the public hearing) and your completed F-1 to the PDC.

Applications are due March 10th for annual filers, or prior to the two-week deadline for candidates and new appointees.

Questions? Contact PDC staff at (360) 753-1111; 1-877-601-2828 (toll-free in Washington State) or by e-mail at pdcc@pdcc.wa.gov.

Application Questionnaire

Applicant Information

Filer Name (as it appears on the F-1): Maritza Rivera

Office Held or Sought: Seattle City Council (District 4)

Period Covered by Request (calendar year or previous 12 months): Previous 12 months

Filing Status (check one):

An elected or state appointed official filing annual F-1

Candidate filing F-1

Newly appointed filing F-1

Is this a renewal of a previously granted request?

Yes No

Instructions

Please answer each question below. You may attach court documents or other relevant items for consideration. **Please note that this application and any documents submitted for consideration are public documents subject to the Public Records Act RCW 42.56.**

1. **EMAIL ADDRESS.** Pursuant to RCW 42.17A.055, email is the official means of communication for the PDC. Please supply an email address to use for correspondence with you about your request.
Email address: maritza@maritzaforseattle.com

2. **INCOME AND OWNERSHIP INTERESTS.** Are you requesting to be exempted from disclosing the business or governmental* customers of an entity listed on the F-1? **If the disclosure of business or governmental customers on the F-1 could violate a confidentiality agreement, create a competitive disadvantage or cause an unreasonable hardship due to customer volume, limited staff resources, or an inability to sort customer list, please explain the hardship in detail.** (*Please note that the Commission rarely grants an exemption for governmental customers. If you are including this in your request, please provide additional detail regarding the hardship.) **Attach a sheet if more room is needed.**

Please see attached cover letter for details.

List the name of each entity, business, union, association, non-profit, charitable organization, or other entity for which you are seeking a modification from reporting the entity's reportable customers. **Attach a sheet if more room is needed.**

- **room is needed.**

(1) Sound View Strategies LLC, (2) Friends of Waterfront Seattle, (3) Transportation Choices Coalition, and (4) Rainier Golf and Country Club

- Describe the size of the entity such as annual sales, number of customers or accounts, the number of employees, and other pertinent information. **Attach a sheet if more room is needed.**

Please see attached cover letter for details.

- How many business customers have paid the entity more than \$12,000 during the reporting period and would be subject to disclosure? If you are requesting an exemption from identifying governmental customers as well, please include the same detail. **Attach a sheet if more room is needed.**

Please see attached cover letter for details.

- Do you have access to the entity's customer list? Yes No

- Are you involved in the day-to-day operations of the entity? Yes No

- Are any of the entity's customers listed in public sources, publications, websites or other public records? Yes No

- If yes, identify the website or other public location. **Attach a sheet if more room is needed.**

Please see attached cover letter for details.

- Does the entity have the ability to sort its customer list to identify those paying more than \$12,000 during the reporting period? Yes No

- Do you have a 10% or more ownership interest in the entity? Yes No

- Describe other relevant information you believe the Commission should consider as to why it would be a manifestly unreasonable hardship if the information was required to be disclosed. **Attach a sheet if more room is needed.**

Please see attached cover letter for details.

- Did you disclose the purpose of all payments and the actual dollar amount the entity received from the governmental unit in which you seek or hold office? (Please note that this information is required to be disclosed and will not be granted as part of your request.)

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you answered no, please explain why not. **Attach a sheet if more room is needed.**

3. **NOT FRUSTRATE THE PURPOSES OF THE ACT.** Please describe the jurisdiction or agency for which you hold or seek public office, and the duties performed by you as a public official (examples: adopting rules or ordinances, hiring staff, approving contracts, setting policy, etc.). Please explain why not disclosing the business or governmental customers of the entity present no actual or potential conflict of interest.

Please see attached cover letter for details.

4. **CONFLICT RECUSAL.** If any matter coming before you at the public entity you serve involves a conflict of interest between your personal interests and your public duties, will you recuse yourself from that matter, regardless of whether you have disclosed that personal interest on an F-1 form?

Yes No

If you answered no, please explain why not.

-
5. **OTHER INFORMATION.** Is there any other information you want the Commission to consider regarding your modification request? (If you are attaching any information or documents, please describe attachments.)

Please see attached cover letter for details.

Hearing Process

Your request, including the F-1, this Application Questionnaire and any other documents provided, will be presented at a public hearing.

You are not required to participate at the hearing. If you will not be attending the hearing in person or by telephone, you must complete and sign the attached certification prior to submission.

The Commission can grant your request in full, grant part of your request, deny your request, or ask for additional information to be heard at a future public hearing.

An order will be issued to you by e-mail with the Commission's decision.

March 23, 2023

Kevin J. Hamilton
KHamilton@perkinscoie.com
D. +1.206.359.8741
F. +1.206.359.9741

VIA EMAIL

Washington Public Disclosure Commission
Evergreen Plaza
711 Capitol Way S #206
Olympia, WA 98504
pdc@pdc.wa.gov

Re: Personal Financial Affairs Statement (F-1) Modification Request for Seattle City Council Candidate Maritza Rivera

Dear Sir or Madam:

This letter serves as a formal modification request for the Personal Financial Affairs Statement (F-1) of Seattle City Council Candidate Maritza Rivera (“Mrs. Rivera”). Mrs. Rivera is married to Daniel Kully (“Mr. Kully”), who has ownership interests in three entities¹ and serves in an organizational role in three non-profit organizations. Mrs. Rivera does not have any involvement in the day-to-day operations of these entities nor any relationship to these entities. She does not have any position or play any roles in these entities. Furthermore, Mrs. Rivera’s marriage to Mr. Kully by no means makes her knowledgeable about the activities or intricacies of these organizations. Despite this, absent modification of the otherwise-applicable disclosure rules, Mrs. Rivera would be required to report the government agencies and business customers of these entities who provided more than \$12,000 in compensation in the last year.² Such a requirement would be “a manifestly unreasonable hardship.”³

An applicant may request a modification when he or she is “required to report the activities of an entity *solely because the applicant’s spouse. . .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[.]*”⁴ In such a case, the applicant may be permitted to only disclose:

- (1) All payments made by the agency or jurisdiction in which the applicant seeks office,

¹ Mrs. Rivera seeks a modification relating to only one of these entities, Sound View Strategies LLC. Mrs. Rivera completed the required information for the other two entities, Kully Hall LLC and Two Degrees Live, on her F-1.

² See WASH. REV. CODE § 42.17A.710(g)(ii).

³ WASH. ADMIN. CODE § 390-28-100(1).

⁴ *Id.* § 390-28-100(1)(e)(iv) (emphasis added).

- (2) The business or governmental customers or clients of the applicant's spouse who provided more than \$12,000 in compensation of which the applicant is aware, and
- (3) Any other business and 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 office.⁵

Mrs. Rivera seeks relief under such a modification. Specifically, Mrs. Rivera requests this modification for the following entities listed on the F-1, including:

- (1) Sound View Strategies LLC,
- (2) Friends of Waterfront Seattle,
- (3) Transportation Choices Coalition, and
- (4) Rainier Golf and Country Club.

Below is additional information to support this modification request.

Mr. Kully has an ownership interest in the following entities.

1. **Sound View Strategies LLC:** Mr. Kully has a 25% ownership in this consulting firm. Sound View Strategies LLC works with a variety of clients, some of whom are publicly available on their website.⁶ Mr. Kully has had no clients from March 9, 2022, to March 9, 2023, through Sound View Strategies LLC. Additionally, Mr. Kully does not have access to the client accounts at Sound View Strategies and therefore does not know how many business customers paid the entity more than \$12,000 during March 9, 2022, to March 9, 2023. Mr. Kully did not receive compensation from any clients at Sound View Strategies during March 9, 2022, to March 9, 2023, and on-going time period. Mr. Kully is unaware whether Sound View Strategy can sort its customer list. Mr. Kully is not involved in day-to-day operations at Sound View Strategies.

In addition, Mr. Kully has an organizational role in the following entities.

⁵ *Id.*

⁶ See Our Clients, available at <https://soundviewstrategies.biz/clients/>.

1. **Friends of Waterfront Seattle:** This is a non-profit organization focused on the revitalization of the Seattle waterfront. Mr. Kully serves as a Board Member.⁷ Mr. Kully is unaware of the number of the number of employees at this entity nor the number of business customers that have paid this entity more than \$12,000 from March 9, 2022, to March 9, 2023. Mr. Kully serves as a volunteer in his capacity as board member and does not receive compensation for his service.
2. **Transportation Choices Coalition:** This is a non-profit organization advocating for better and more transportation in Washington. Mr. Kully serves as the Board Vice President.⁸ Mr. Kully is unaware of the number of the number of employees at this entity nor the number of business customers that have paid this entity more than \$12,000 from March 9, 2022, to March 9, 2023. Mr. Kully serves as a volunteer in his capacity as board member and does not receive compensation for his service.
3. **Rainier Golf and Country Club:** Mr. Kully is President of the Board of Directors at the golf club. Mr. Kully is unaware of the business customers that have paid this entity more than \$12,000 from March 9, 2022, to March 9, 2023. Mr. Kully serves as a volunteer in his capacity as President of the Board of Directors and does not receive compensation for his service.

Permitting Mrs. Rivera to disclose only those business and governmental customers of which she has knowledge does not interfere with the purpose of the personal financial statement. First, Mrs. Rivera does not have any vested interest in any of these entities. She is not an owner, board member, or involved in any other capacity. Second, Mrs. Rivera is unaware of Mr. Kully's specific activities with these organizations beyond the knowledge that Mr. Kully volunteers with these entities.

In compliance with the instructions on the F-1 modification application, Mrs. Rivera has disclosed only those business or governmental customers "that would be reportable if the Commission grant[ed] the [requested] modification."⁹ In addition, Mrs. Rivera disclosed payments, if any, made by Seattle to the listed entity.

⁷ See Who We Are, available at <https://waterfrontparkseattle.org/about/#who-we-are>.

⁸ See Our Team, available at <https://transportationchoices.org/about/>.

⁹ Request for Exemption from Reporting Business and Governmental Customers Application Instructions, available at https://www.pdc.wa.gov/sites/default/files/2021-11/Ownership%20Interest%20Mod%20App%20E%20-%20signature_0.pdf.

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March 23, 2023
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Please let me know if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin J. Hamilton", written over a vertical line.

Kevin J. Hamilton
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