MODIFICATION REQUEST COVER SHEET

Name of Filer	ANNA BERMAN
Reporting Period	 Annual report – calendar year 2021 Appointee/Candidate report
Type of Request	 New Renewal with No Change Full Commission Approval Renewal with Change
Office Held/Sought & Term	Professional Staff, Office of the Governor
Application Rule(s)	 □ Income & Ownership Interest: WAC 390-28-100(b) ☑ Personal Residence: WAC 390-28-100(1)(d) □ Attorney: WAC 390-28-100(1)(e)(i) □ Judge / Judicial Candidate: WAC 390-28-100(1)(e)(ii) □ Spousal: WAC 390-28-100(1)(e)(iv) □ Other: WAC 390-28-100
Explanation of Rule(s)	Personal residence - Real property. Regarding reporting the information otherwise required by RCW <u>42.17A.710</u> (1)(h) through (k): (i) Under WAC <u>390-24-200</u> , 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. (ii) No modification will be necessary if the filer describes the real property using one of the alternatives in WAC <u>390-24-200</u> , plus the name of the county. Judges, prosecutors, or sheriffs may describe a personal residence in the alternative manner provided under RCW <u>42.17A.710</u> (2), and WAC <u>390-24-200</u> 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.
Supporting Documents (attached)	 Amended F-1 (filed April 13, 2022) Current F-1 (filed April 12, 2022) Modification Application

Reason(s) for Modification (as stated by filer)	 Anna Berman is requesting a partial reporting modification that would exempt her from disclosing her personal residential address on her Personal Financial Affairs Statement (F-1 report), during calendar year 2021, due to safety concerns. In her application, Ms. Berman cited a specific stalking instance of an individual who suffers from PTSD, owns firearms and has a history of showing up uninvited at her previous residences. Ms. Berman has stated that she has been very careful to not publicly disclose her current address.
Other Issues	 Ms. Berman's request could be granted for up to three years as allowed in RCW 42.17A.120(1). Ms. Berman has agreed to recuse herself if there is a conflict of interest between her duties as an annual filer and her personal interests. PDC staff have informed Ms. Berman of the residential address alternatives set forth in WAC 390-24-200. Ms. Berman's records would be exempt from public disclosure if the Commission finds in accordance with <u>RCW 42.17A.120</u> and <u>WAC 390-28-080</u> that disclosure of such information would present a personal risk to a reasonable person.