

MODIFICATION REQUEST COVER SHEET

Name of Filer	DAVID ROSENBAUM
Reporting Period	☒ Annual report – covering calendar year 2024 ☐ Candidate report
Type of Request	☐ New ☐ Renewal with No Change ☒ Full Commission Approval – October 12, 2021 ☒ Renewal with Change
Office Held/Sought & Term	City Council Member, City of Mercer Island Elected in 2023 Current term expires 2027
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: RCW 42.17A.120
Explanation of Rule(s)	Personal residence - Real property. Regarding reporting the information otherwise required by RCW 42.17A.710 (1)(h) through (k): (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. (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 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. Suspension or modification of reporting requirements. (1) 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 to the extent necessary to substantially relieve the hardship and only after a hearing is held and the suspension or modification receives approval. A suspension or modification of the financial affairs reporting requirements in RCW 42.17A.710 may be approved for an elected official's term of office or for up to three years for an executive state officer. If a material change in the applicant's circumstances or relevant information occurs or has occurred, the applicant must request a modification at least one month prior to the next filing deadline rather than at the conclusion of the term. (2) A manifestly unreasonable hardship exists if reporting the name of an entity required to be reported under RCW 42.17A.710(1)(g)(ii) would be likely to adversely affect the competitive position of any entity in which the person filing the report, or any member of the person's immediate family, holds any office, directorship, general partnership interest, or an ownership interest of ten percent or more. (3) Requests for reporting modifications may be heard in a brief adjudicative proceeding as set forth in RCW 34.05.482 through 34.05.494 and in accordance with the standards established in this section. The commission, the commission chair acting as presiding officer, or another commissioner appointed by the chair to serve as presiding officer, may preside over a brief adjudicatory proceeding. If a modification is requested by a filer because of a concern for personal safety, the information submitted regarding that safety concern shall not be made public prior to, or at, the hearing on the request. Any information provided or prepared for the modification hearing shall remain exempt from public disclosure under this chapter and chapter 42.56 RCW to the extent it is determined at the hearing that disclosure of such information would present a personal safety risk to a reasonable person. (4) If the commission, or presiding officer, grants a modification request, the commission or presiding officer may apply the modification retroactively to previously filed reports. In that event, previously reported information of the kind that is no longer being reported is confidential and exempt from public disclosure under this chapter and chapter 42.56 RCW. (5) Any citizen has standing to bring an action in Thurston county superior court to contest the propriety of any order entered under this section within one year from the date of the entry of the order. (6) The commission shall adopt rules governing the proceedings.
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Supporting Documents (attached)	☒ F-1 for calendar year 2024 (filed April 11, 2025) ☒ Written Request ☒ Commission Order (Entered November 10, 2021)
Reason(s) for Modification (as stated by filer)	• Mr. Rosenbaum is requesting a renewal of a previously granted reporting modification that would exempt him from disclosing his residential address on his Personal Financial Affairs Statement (F-1 report) covering calendar year 2024, due to continued safety concerns. • Mr. Rosenbaum is also requesting to use an address alternative for campaign contributions he makes when required to be disclosed per RCW 42.17A.240. • In his previous request, Mr. Rosenbaum stated that his request is being made due to specific threats made by a neo-Nazi against his wife and family resulting in a conviction on five separate federal charges. Mr. Rosenbaum states that the individuals convicted of these crimes have since been released from federal custody. • Mr. Rosenbaum states that the circumstances have changed significantly, leading to consultation with security experts who have recommended improvements to the family's physical security and limiting online information regarding their home address. • Mr. Rosenbaum states that the group making the threats is known for their ability to use open-source information, such as home addresses, to learn about potential targets, so he and his family are continuing to take steps to protect themselves.
Other Issues	Mr. Rosenbaum has continued to use the residential address alternative allowed as part of the Commission's November 2021 Order on his F-1 reports. Mr. Rosenbaum'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. Mr. Rosenbaum's request related to disclosure on the F-1 reports could be granted through his current term of office as allowed in RCW 42.17A.120(1).