

## MODIFICATION REQUEST COVER SHEET

<b>Name of Filer</b>	<b>HOLLY STANTON</b>
<b>Reporting Period</b>	<input type="checkbox"/> Annual report - calendar year <input checked="" type="checkbox"/> Candidate report – (covering May 20, 2021 to May 19, 2022)
<b>Type of Request</b>	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Full Commission Approval <input type="checkbox"/> Renewal with Change
<b>Office Held/Sought &amp; Term</b>	State Representative, Legislative District 31 Candidate in 2022 Election
<b>Application Rule(s)</b>	<input type="checkbox"/> Income & Ownership Interest: <a href="#">WAC 390-28-100(1)(b)</a> <input type="checkbox"/> Personal Residence: <a href="#">WAC 390-28-100(1)(d)</a> <input checked="" type="checkbox"/> Attorney: <a href="#">WAC 390-28-100(1)(e)(i)</a> <input type="checkbox"/> Judge / Judicial Candidate: <a href="#">WAC 390-28-100(1)(e)(ii)</a> <input type="checkbox"/> Spousal: <a href="#">WAC 390-28-100(1)(e)(iv)</a> <input type="checkbox"/> Other: WAC 390-28-100(1)(e)
<b>Explanation of Rule(s)</b>	<p><b>Lawyers and law firms (when applicant is an incumbent or candidate and acts alone or as part of a governing body, board, or commission).</b> An applicant may be allowed to satisfy the reporting requirements of RCW <a href="#">42.17A.710</a> (1)(g)(ii) and WAC <a href="#">390-24-020</a> by disclosing reportable clients from whom compensation has been paid in excess of the reporting threshold as follows:</p> <p>(A) The names of the business clients for whom the applicant has done legal work;</p> <p>(B) Other clients of the law firm whose interests are significantly affected by the applicant's actions as an elected or appointed official or whose actions will be affected by the applicant's action should the applicant be elected whose identities become known to the applicant through any means;</p> <p>(C) The names of the clients of the law firm who are listed in Martindale Hubbell, the firm's resume, web site, or similar promotional materials; and</p> <p>(D) Governmental clients that have done business with the law firm.</p> <p>An applicant may also be required to disclose all business customers from whom compensation in excess of the reporting threshold has been received whose identities are publicized or referenced in documents open for public inspection at the courts, in administrative hearings, at proceedings conducted by public agencies, or are a matter of public knowledge in other similar public forums. Alternatively, the commission may require an applicant to report only those publicly identifiable customers of which the applicant is aware.</p>
<b>Supporting Documents (attached)</b>	<input checked="" type="checkbox"/> Current F-1 (filed June 3, 2022) <input checked="" type="checkbox"/> Modification Application

<b>Reason(s) for Modification (as stated by filer)</b>	<ul style="list-style-type: none"><li>• Ms. Stanton is requesting a partial reporting modification that would exempt her from disclosing the business customers that paid \$12,000 or more during the previous twelve months to Law Office of Holly Stanton, PLLC of which she is a 100% owner.</li><li>• Ms. Stanton stated that her request is being made primarily due to her concern of violating attorney client privilege and that publicly disclosing the names of her clients may lead to harassment. She specifically cited the Rules of Professional Conduct (RPC) 1.6.</li><li>• Ms. Stanton stated that her firm only conducts personal matters, such as divorce, adoption and estates and further stated that her clients are expecting that their information will be protected and kept confidential.</li><li>• Ms. Stanton is the only attorney employed by the Law Office of Holly Stanton, PLLC. The firm has annual sales under \$200,000 and a usual client case load between 30 - 60 clients at any one time with two clients that would be potentially reportable.</li><li>• Ms. Stanton has confirmed on her F-1 report that no payments were received by her law firm from the State of Washington and no other governmental entities have made payments to her firm during the reporting period.</li><li>• Ms. Stanton stated her law firm customers are not listed in Martindale Hubble, on a website or similar promotional materials.</li><li>• Ms. Stanton stated she has never held public office in the past.</li></ul>
<b>Other Issues</b>	<ul style="list-style-type: none"><li>• Holly Stanton has agreed to recuse herself if a matter came before her involving a conflict of interest between her personal interests and public duties, if elected.</li></ul>