MODIFICATION REQUEST COVER SHEET

Name of Filer	**Karim Merchant**
Reporting Period	☐ Annual report – ☒ Candidate report – Covering May 8, 2025 to May 7, 2026
Type of Request	☒ New ☐ Renewal with No Change ☐ Full Commission Approval ☐ Renewal with Change
Office Held/Sought & Term	State Supreme Court, Seat 7 - Candidate in the 2026 election
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 29B.20.040
Explanation of Rule(s)	**Personal residence - Real property.** Regarding reporting the information otherwise required by RCW 29B.55.030 (1)(h) through (k): (i) 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 29B.55.030(2) and WAC 390-24-200 without a modification. (ii) 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. **Lawyers and law firms (when applicant is an incumbent or candidate and acts alone or as part of a governing body, board, or commission).** An applicant may be allowed to satisfy the reporting requirements of RCW 29B.55.030 (1)(g)(ii) and WAC 390-24-020 by disclosing reportable clients from whom compensation has been paid in excess of the reporting threshold as follows: (A) The names of the business clients for whom the applicant has done legal work;

	(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; (C) The names of the clients of the law firm who are listed in Martindale Hubbell, the firm's resume, website, or similar promotional materials; and (D) Governmental clients that have done business with the law firm. 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.
Supporting Documents **(attached)**	☒ F-1 for previous twelve months (amended June 29, 2026) ☒ Modification Application ☐ Commission Order
Reason(s) for Modification **(as stated by filer)**	• Karim Merchant is requesting a reporting modification that would exempt him from disclosing his residential address on his Personal Financial Affairs Statement (F-1 report) covering the previous twelve months, due to safety concerns. • Mr. Merchant states that this request is being made due to safety concerns for himself and his family if persons involved in the legal system locate their residential address. • Karim Merchant is also requesting a reporting modification that would exempt him from disclosing clients of his law firm, K. Merchant Law, PLLC. • Mr. Merchant states that disclosure of reportable business clients of K. Merchant Law, PLLC could cause an unreasonable hardship and, as an attorney, he has a duty to maintain client confidentiality. • Mr. Merchant states that he is a solo practitioner with approximately 30 clients over the past calendar year. Most of his clients are public defense clients, and payments from that agency have been disclosed. He has four private clients whose

	total payments range from $50,000-$75,000. He is involved in the day-to-day operations of the firm and has access to the client list. • Mr. Merchant states that he has one client that has paid his firm more than $12,000 during the reporting period and would be subject to disclosure. Mr. Merchant states that he has no clients listed in Martindale Hubbell, the firm's resume, website or other promotional materials.
Other Issues	• Mr. Merchant has used a PO Box on his 2026 candidate F-1 report to identify his reportable real estate; this will require amendment to an approved address as identified in RCW 29B.55.030(2)(a). • Mr. Merchant agrees to recuse himself if any matter comes before him involves a conflict of interest between his personal interests and his public duties. • Mr. Merchant states that he has received no payments from the governmental unit he seeks to hold office with and has never represented the government. • Mr. Merchant states that he holds a contract with Snohomish County where he represents persons who cannot afford representation. All payments from Snohomish County have been disclosed. • Mr. Merchant's records would be exempt from public disclosure if the Commission finds in accordance with RCW 29B.20.040 and WAC 390-28-080 that disclosure of such information would present a personal risk to a reasonable person.