



**State of Washington**

**PUBLIC DISCLOSURE COMMISSION**

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**Memorandum**

To: Public Disclosure Commission

From: Jordan Campbell, Compliance Coordinator

Date: December 4, 2024

Subject: Robert Pruneda Enforcement Hearing Memorandum: PDC Case 162544

**Allegations:**

PDC staff alleges that Robert Pruneda (The Respondent), an incumbent Parks and Recreation Commissioner for Adams County Parks and Recreation District 1 violated RCW 42.17A.700 by failing to file a Personal Financial Affairs Statement (F-1 report) for calendar year 2023, due no later than April 15, 2024.

**Background and Prior Violations:**

- Robert Pruneda was an elected Parks and Recreation Commissioner for Adams County Parks and Recreation District 1, in calendar year 2023.
- Between March 12 and April 23, 2024, PDC staff sent seven email reminders to all elected and appointed officials regarding their missing F-1 reports for calendar year 2023.
- On November 19, 2024, PDC staff emailed and mailed The Respondent a hearing notice regarding the missing report for calendar year 2023. This hearing notice was sent to The Respondent's email and mailing address of record.
- As of December 4, 2024 the Respondent has not filed an F-1 covering calendar year 2023.

**Prior Violations**

**First Violation (PDC Case 95426):**

- The Respondent, who was a candidate for Parks and Recreation Commissioner for Adams County Parks and Recreation District 1, failed to file a C-1 and F-1 report for election year 2021, which was due no later than June 4, 2021
- At an August 12, 2021 Adjudicative Proceeding (Brief Enforcement Hearing), the Respondent was found in violation of RCW 42.17A.700 and assessed a \$500 penalty.

- To date, the Respondent has not paid the outstanding \$500 civil penalty for case 95426.
- In addition, the missing C-1 and F-1 reports for election year 2021 has not been filed.

Second Violation (PDC Case 110555):

- The Respondent, who was an elected Parks and Recreation Commissioner for Adams County Parks and Recreation District 1, failed to file an F-1 report for calendar year 2021 which was due no later than April 15, 2022.
- At a October 27, 2022 Adjudicative Proceeding, the Respondent was found in violation of RCW 42.17A.700 and assessed a \$1500 penalty.
- To date, the Respondent has not paid the outstanding \$1500 civil penalty for case 110555.
- In addition, the missing F-1 report for calendar year 2021 has not been filed.

**Additional Information**

- Per WAC 390-37-143(5), cases “will automatically be scheduled before the full commission for an enforcement action when the respondent:  
(a) Was found in violation during a previous reporting period;  
(b) The violation remains in effect following any appeals; and  
(c) The person has not file the disclosure forms that were the subject of the prior violation at the time the current hearing notice is being sent.”

**Staff Recommendation:**

Staff recommends the Commission find that The Respondent violated 42.17A.700 by failing to timely file an F-1 report for calendar year 2023, and:

1. Assess the Respondent a civil penalty for a second occasion of a violation heard at full where the report was not filed before the date of the hearing per WAC 390-37-182 to be made payable within 30 days of the date of the Order. The base penalty range for this fact pattern is \$1,000-\$2,000: and
2. Require Robert Pruneda to file the missing F-1 report for calendar year 2023 within 30 days of the date of the Order.