



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcca.wa.gov](http://www.pdcca.wa.gov)**

**Memorandum**

To: Public Disclosure Commission

From: Jordan Campbell, Compliance Coordinator

Date: September 15, 2025

Subject: Robert Amenn Enforcement Hearing Memorandum: PDC Case 173084

**Allegations:**

PDC staff alleges that Robert Amenn (the Respondent), a candidate for School Board Director for Sultan SD 311, violated RCW 42.17A.205 by failing to file a Candidate Registration (C-1), due within 14 days of becoming a candidate or no later than May 23, 2025.

PDC staff alleges the Respondent, a candidate for School Board Director for Sultan SD 311, violated RCW 42.17A.700 by failing to file a Personal Financial Affairs Statement (F-1), due within 14 days of becoming a candidate or no later than May 23, 2025.

**Background and Prior Violations:**

- The Respondent, a candidate for School Board Director for Sultan SD 311, declared their candidacy on May 9, 2025, for the 2025 election year.
- Between May 12 and May 27, 2025, PDC staff sent email reminders to all registered candidates regarding their missing C-1 and F-1 report for election year 2025.
- On September 3, 2025, PDC staff mailed and emailed Respondent a hearing notice regarding the missing reports for election year 2025. This hearing notice was sent to Respondent's email address of record. **(Exhibit 1)**

- As of September 15, 2025, Respondent has not filed their C-1 report for election year 2025.
- As of September 15, 2025, Respondent has not filed their F-1 report for election year 2025.

**First Violation (PDC Case 109536): (Exhibit 2)**

- Respondent, a 2022 candidate for State Representative in Legislative District 12 failed to file a C-1 and F-1. The report was due no later than June 4, 2022
- At a July 21, 2022 Brief Adjudicative Proceeding (Brief Enforcement Hearing), Respondent was found in violation of RCW 42.17A.205 and RCW 42.17A.700 and assessed a civil penalty of \$400 with \$200 suspended, provided the conditions of the order were met and there were no further violations for four years.
- To date, Respondent has not paid the outstanding \$400 civil penalty for case 109536.
- The missing C-1 report for election year 2022 has been filed however the missing F-1 has not been filed.

**Staff Recommendation:**

Staff recommends the Commission find that the Respondent violated 42.17A.205 by failing to file timely a C-1 report for election year 2025 and RCW 42.17A.700 by failing to file timely a F-1 report for election year 2025, and:

1. Assess Respondent a civil penalty between \$0 and \$1000 per report for the outstanding 2025 election year C-1 and F-1 reports as laid out in WAC 390-37-182, the penalty schedule for a respondent on their second violation (first violation heard at full) who did not file the report in question before the hearing, which is payable within 30 days of the date of the order.
2. Require Respondent to file the missing C-1 report for election year 2025 and the F-1 from election year 2022 and 2025 within 30 days of the date of the Order.

**Attachments:**

- Exhibit 1: 173084 Robert K Amenn Hearing Notice (Full)
- Exhibit 2: 109536 Amenn Robert C-1 F-1 BAP Order

# PDC Exhibit 1



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September 3, 2025

Robert Amenn  
319 13th St,  
Gold Bar WA 98251

Also delivered electronically to [robert@albionnet.com](mailto:robert@albionnet.com).

Subject: C-1 and F-1 Enforcement Hearing Notice; PDC Case Number 173084

Dear Robert Amenn

Public Disclosure Commission (PDC) records indicate that you are or were a candidate for public office in 2025, and we have not received a Candidate Registration (C-1 report) disclosing your campaign information for the 2025 election cycle or your Personal Financial Affairs Statement (F-1 report) disclosing personal financial information for the twelve months preceding your candidacy.

RCW 42.17A.205 and RCW 42.17A.700 require candidates to file a C-1 report and an F-1 report within two weeks of declaring their candidacy, which were to have been filed no later than May 23, 2025.

In accordance with RCW 42.17A.110 and RCW 42.17A.755, an Adjudicative Proceeding (Enforcement Hearing) has been scheduled to determine if you violated RCW 42.17A.205 and RCW 42.17A.700 by failing to file the required C-1 report and F-1 reports for the 2025 election cycle. Under the Enforcement Hearing rules, the Commission has the authority to assess a civil penalty in accordance with WAC 390-37-182, the Enforcement Hearing penalty schedule adopted by the Commission (see enclosed copy).

**HEARING INFORMATION**

Date and time:	<b>September 25, 2025, at 9:50 a.m.</b>
Place:	711 Capitol Way Rm. 206 Olympia, WA 98504 Live Audio and Online Transmission
Presiding Officer:	Public Disclosure Commission
Authority:	RCW 42.17A and WAC 390

**PARTICIPATING VIA MICROSOFT TEAMS**

The Enforcement Hearing will be audio and video recorded. The Commissioners and PDC staff will join the meeting in-person or remotely via Microsoft Teams videoconferencing platform.

Anyone wishing to participate in the hearing remotely must follow the instructions below and join the meeting on a computer or mobile app **promptly at 9:40 on September 25, 2025**. Please remain in the meeting until the Presiding Officer calls your name and case number. After your case has been heard, you may leave or stay in the meeting.

*Please note that you must stay muted at all times except while your case is being heard.*

**Join on your computer or mobile app:**

<https://tinyurl.com/4yskbd7h>

Dial in by phone [+1 564-999-2000](tel:+15649992000); phone conference ID 757828431#

If you are unable to use Teams or experience technical difficulties, please call the PDC's main number 1-360-753-1111 to obtain information regarding alternate participation by telephone.

**INTERPRETER**

If a party or witness to this proceeding speaks limited English or is hearing-impaired, and needs an interpreter, a qualified interpreter will be appointed at no cost to you. Please inform us at least five business days before the hearing or no later than **September 18, 2025**, if you require an interpreter for this proceeding and/or translation of its written materials in a language other than English. Please contact us by email at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) or call us at (360) 753-1111 or 1-877-601-2828 to request an interpreter.

**SUBMITTING WRITTEN MATERIALS**

In advance of the Enforcement Hearing, you may provide a written response describing the facts of your case for consideration by the Commission, including any circumstances or mitigating factors you would like considered. Please submit your written response so it is received by no later than **September 16, 2025, at 1 p.m.**

**SUBMITTING THE REPORTS**

You are strongly encouraged to complete and submit the required reports online prior to the Brief Enforcement Hearing so they are received by the PDC no later than **September 24, 2025**. The reports must be submitted electronically. Instructions for filing the C-1 can be found [here](#).

If you have any questions about the hearing process prior to the hearing date, please contact PDC Staff by email at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) – and be sure to reference your case number in the subject line of the email. Information can also be found on the PDC site [here](#).

Sincerely,

PDC Staff  
Compliance and Enforcement Division



Enclosures

- PDC Penalty Schedule

**Penalty Schedule** [[WAC 390-37-182](#)]:

**Penalty factors (full adjudicatory proceedings).**

(1) In assessing a penalty after a full adjudicatory proceeding, the commission considers the purposes of chapter [42.17A](#) RCW, including the public's right to know of the financing of political campaigns, lobbying and the financial affairs of elected officials and candidates as declared in the policy of RCW [42.17A.001](#); and, promoting compliance with the law. The commission also considers and applies RCW [42.17A.755](#) and may consider any of the additional factors described in subsection (3) of this section.

(2) Under RCW [42.17A.755](#), the commission:

- (a) May waive a penalty for a first-time violation;
- (b) Must assess a penalty for a second violation by the same person or individual, regardless if the person or individual committed the violation for a different political committee;
- (c) Must assess successively increased penalties for succeeding violations pursuant to the following schedule:

<b>Violations:</b>			
<b>Respondent failed to file or timely file an accurate or complete: (1) Statement of Financial Affairs (F-1 Report) / (2) Candidate Registration / (C-1 Report) / (3) Lobbyist Monthly Expense Report (L-2 Report) / (4) Lobbyist Employer Annual Report (L-3 Report) and (5) Local Treasurer's Annual Report (T-1 Report).</b>			
	<b>1st Occasion</b>	<b>2nd Occasion</b>	<b>3rd Occasion</b>
Filed missing report after being notified about the complaint and provided written explanation with mitigating circumstances.	\$0 - \$500	\$500 - \$1,500	\$1,500 - \$2,500
Report is filed late and is incomplete or inaccurate.	\$0 - \$1,000	\$1,000 - \$2,000	\$2,000 - \$3,000

[Excerpt above]

(3) In addition to the requirements of RCW [42.17A.755](#), the commission may consider the nature of the violation and any relevant circumstances, including the following factors:

- (a) The respondent's compliance history, including whether the noncompliance was isolated or limited in nature, indicative of systematic or ongoing problems, or part of a pattern of violations by the respondent, or in the case of a political committee or other entity, part of a pattern of violations by the respondent's officers, staff, principal decision makers, consultants, or sponsoring organization;
- (b) The impact on the public, including whether the noncompliance deprived the public of timely or accurate information during a time-sensitive period, or otherwise had a significant or material impact on the public;
- (c) Sophistication of respondent or the financing, staffing, or size of the respondent's campaign or organization;
- (d) Amount of financial activity by the respondent during the statement period or election cycle;
- (e) Whether the noncompliance resulted from a knowing or intentional effort to conceal, deceive or mislead, or violate the law or rule, or from collusive behavior;
- (f) Whether the late or unreported activity was significant in amount or duration under the circumstances, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period;
- (g) Whether the respondent or any person, including an entity or organization, benefited politically or economically from the noncompliance;
- (h) Personal emergency or illness of the respondent or member of his or her immediate family;
- (i) Other emergencies such as fire, flood, or utility failure preventing filing;
- (j) PDC staff or equipment error, including technical problems at the PDC preventing or delaying electronic filing;

(k) The respondent's demonstrated good-faith uncertainty concerning staff guidance or instructions;

(l) Corrective action or other remedial measures initiated by respondent prior to enforcement action, or promptly taken when noncompliance brought to respondent's attention (e.g., filing missing reports, amending incomplete or inaccurate reports, returning prohibited or overlimit contributions);

(m) Whether the respondent is a first-time filer;

(n) Good faith efforts to comply, including consultation with PDC staff prior to initiation of enforcement action and cooperation with PDC staff during enforcement action, and a demonstrated wish to acknowledge and take responsibility for the violation;

(o) Penalties imposed in factually similar cases; and

(p) Other factors relevant to a particular case.

(4) The commission may consider the factors in subsections (1) through (3) of this section in determining whether to suspend a portion or all of a penalty upon identified conditions, and whether to accept, reject, or modify a stipulated penalty amount recommended by the parties.

(5) Notwithstanding the above schedule, the commission may assess a penalty of up to ten thousand dollars per violation, or a greater amount if agreed to by the parties, pursuant to RCW [42.17A.755](#), based on the aggravating factors set forth in subsections (1) through (3) of this section.

(6) The penalty schedule for brief enforcement proceedings is provided under WAC [390-37-143](#).

[Statutory Authority: RCW [42.17A.110](#)(1), 2019 c 428, and 2019 c 261. WSR 20-02-062, § 390-37-182, filed 12/24/19, effective 1/24/20. Statutory Authority: RCW [42.17A.110](#)(1) and 2018 c 304. WSR 18-24-074, § 390-37-182, filed 11/30/18, effective 12/31/18. Statutory Authority: RCW [42.17A.110](#)(1). WSR 16-01-015, § 390-37-182, filed 12/4/15, effective 1/4/16. Statutory Authority: RCW [42.17A.110](#), [42.17A.755](#). WSR 13-05-014, § 390-37-182, filed 2/7/13, effective 3/10/13.]

# PDC Exhibit 2





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August 11, 2022

Robert K. Amenn  
319 13<sup>th</sup> Street  
Gold Bar, WA 98251

And delivered electronically to [ROBERT@ALBIONNET.COM](mailto:ROBERT@ALBIONNET.COM)

Subject: PDC Order, Case 109536

Dear Robert Amenn,

Enclosed is a copy of the Public Disclosure Commission's Order Imposing Fine that was entered in the above-referenced case.

At the July 21, 2022 Brief Enforcement hearing, the Presiding Officer assessed a total civil penalty of \$400, of which \$200 is suspended, in accordance with WAC 390-37-143. The \$200 non-suspended penalty is payable within 30 days of the date of this Order, which is **September 12, 2022**.

Please make the check or money order payable to the WA State Treasurer, and mail the payment to the following:

Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504-0908

**It is also ordered that you file the missing F-1 report**, which can be amended as needed subsequent to your request for an F-1 reporting modification being heard at the August 25, 2022 Commission Meeting. If you amend your F-1 report after your modification hearing, please do so no later than **September 12, 2022**.

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically Signed by Tabatha Blacksmith*  
PDC Staff

Enclosure: Initial Order



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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

Robert Amenn,

Respondent.

PDC Case 109536

Findings of Fact,  
Conclusions of Law, and  
**Order Imposing Fine**

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to Robert Amenn (the “Respondent”) dated June 22, 2022, a brief adjudicative proceeding was held on July 21, 2022, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 42.17A.205 by failing to timely file a Candidate Registration (C-1 report) and RCW 42.17A.700 by failing to file a Personal Financial Affairs Statement (F-1 report), disclosing personal financial information for the preceding twelve months, which were both due to be filed within two weeks of candidacy or no later than June 3, 2022.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commission Chair Fred Jarrett was the Presiding Officer and Commissioner Nancy Isserlis attended. Commission staff was represented by Compliance Coordinators Tabatha Blacksmith and Jordan Campbell, and Compliance Officers Jennifer Hansen and Alice Fiman. The Respondent participated in the hearing remotely by telephone.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. The Respondent is or was a candidate for State Representative of Legislative District 12 - House.
2. As a candidate, the Respondent was required to file C-1 and F-1 reports by June 3, 2022.
3. The Respondent filed the C-1 report after the hearing notice, but before the enforcement hearing.
4. The Respondent did not file the F-1 report by the date of the enforcement hearing.
5. The Respondent has no prior violations.

## CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. The Respondent violated RCW 42.17A.205 by failing to timely file the C-1 report by June 3, 2022.
3. The Respondent violated RCW 42.17A.700 by failing to file the F-1 report by June 3, 2022.

## ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED** that the Respondent is assessed a total civil penalty of \$400, in accordance with the candidate C-1 & F-1 penalty schedule set forth in WAC 390-37-143, of which \$200 is suspended based on the conditions described below.
2. It is further ordered that the Respondent:
  - a. File the missing F-1 report prior to August 25, 2022. Concerning your request for an F-1 reporting modification, should the Commission take action that affects your filing requirements at the August 25, 2022 Commission Meeting, you shall promptly file an amended F-1 report, as needed, within 30 days of the date of this Order.
  - b. Pay the \$200 non-suspended portion of the civil penalty within 30 days of the date of this Order. If the Respondent fails to pay the \$200 within 30 days, PDC staff is directed to refer the matter to collections.
3. It is further ordered that \$200 of the \$400 civil penalty is suspended upon the following conditions:
  - a. The Respondent is not found to have committed any further violations of Chapter 42.17A RCW or Title 390 WAC within four years of the date of this Order. The suspended penalty shall not be assessed based solely upon any remediable violation, minor violation, or error classified by the Commission as appropriate to address by a technical correction.
  - b. The missing F-1 report is filed prior to August 25, 2022. If the Respondent fails to file the report prior to August 25, 2022, the suspended portion of the penalty shall immediately become due without further action by the Commission and PDC is directed to refer the matter to collections.
  - c. The non-suspended portion of the penalty (\$200) is paid by the Respondent within 30 days of the date of this Order. If the Respondent fails to pay the non-suspended penalty of \$200 within 30 days, the full penalty amount (\$400) shall immediately become due without further action by the Commission and PDC staff is directed to refer the matter to collections.

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 11<sup>th</sup> day of August, 2022.

Public Disclosure Commission

*Electronically signed by Peter Frey Lavallee*

Peter Frey Lavallee

Executive Director

I, Tabatha Blacksmith, certify that I mailed and emailed a copy of this order to the Respondent at their respective address postage pre-paid, and by email on the date stated herein.

Electronically Signed Tabatha Blacksmith

Signed

Aug. 11, 2022

Date

# APPEALS OF INITIAL ORDER

## REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request by email, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1).
- All requests for review must be submitted electronically to [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

**REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE THIS INITIAL ORDER WAS ELECTRONICALLY DISTRIBUTED TO YOU.**

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

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## FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the FINAL ORDER. *See* WAC 390-37-142(7).

**YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.**