

**FEC Complaint Against Loren Culp (2022 WA-CD4 Candidate)****MUR 8350****RECEIVED**

FEDERAL ELECTION COMMISSION

NOVEMBER 20, 2024 8:53 AM

OFFICE OF GENERAL COUNSEL

**Introduction**

Hello:

I am filing this complaint on behalf of my client David Prutzman. David Prutzman owns a small business (Dave's Campaign and Business Solutions) that produces political yard signs and performs other types of printing for political campaigns.

**Factual Background**

In 2022, Loren Culp ran for Congress in Washington State's 4<sup>th</sup> Congressional District.

During this campaign, Culp's committee ordered printed materials from Dave's Campaign and Business Solutions, a small business owned by David Prutzman.

After losing the election, Culp's campaign committee owed Dave's Campaign and Business Solutions \$4,854.45 for goods that had been provided to the Culp campaign. When Mr. Prutzman spoke with a member of Culp's campaign team about this debt, they did not dispute the validity of the debt. The member of Culp's campaign team said only that there were no campaign funds with which to pay the debts owed to Dave's Campaign and Business Solutions.

Mr. Prutzman has made numerous efforts to communicate with Culp's campaign to collect this debt. These efforts have proven unsuccessful. Mr. Prutzman did not forgive this debt.

The four invoices billed to the Culp campaign which remain unpaid are attached to this complaint. The invoice numbers are #1677, #1749, #1781, and #1873.

**Violation of FEC Requirements**

The FEC website, summarizing legal requirements, notes that: *"Unpaid bills and written contracts or agreements to make expenditures are considered debts. Debts and obligations must be reported continuously until repaid."*<sup>1</sup> See 11 CFR 100.112, 11 CFR 104.3(d), 11 CFR 104.11, & 11 CFR Part 116.

Despite this requirement, the Culp campaign failed to disclose the debt on its terminal FEC Form 3 report filed on 11/23/2022.<sup>2</sup> This debt was still outstanding at the time this report was filed, and for all periods covered by the report. No other report filed by the Culp 2022 campaign lists any debt owed by the campaign.

These debt were originally incurred on 8/31/21, 11/29/21, 3/10/22, & 4/13/22. See attached invoices: #1677, #1749, #1781, and #1873.

The Culp campaign has failed to file any FEC Form 3 reports since filing its terminal FEC Form 3 report on 11/23/2022.

<sup>1</sup> <https://www.fec.gov/help-candidates-and-committees/handling-loans-debts-and-advances/>

<sup>2</sup> Culp 2022 Terminal Report for FEC: <https://docquery.fec.gov/cgi-bin/forms/C00777490/1662374/>

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Conclusion

If you need additional information, please do not hesitate to e-mail me at

[Redacted]

Sincerely,

*[Handwritten Signature]*

Conner Edwards

Attorney for David Prutzman

WSBA # 62961

[Redacted]

Name and Address of Complainant

David Prutzman  
7619 144th Street Ct  
Puyallup, WA 98375

NOTARIAL CERTIFICATE  
(VERIFICATION UPON OATH OR AFFIRMATION)

State of Washington

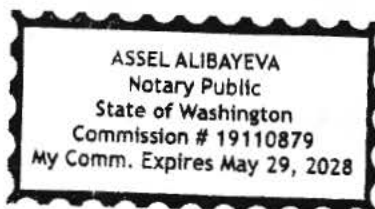
County of King

Signed and sworn to (or affirmed) before me on 11/19/2024 [Date] by Conner G. Edwards  
[Name of Person Making Statement].

Dated: 11/19/2024

*[Handwritten Signature]*  
Signature

(Seal or stamp)



Notary Public  
Title

My appointment expires: 05/29/2028

**Dave's CBS**

7619 144th Street Ct  
 Puyallup, WA 98375  
 +1 2539855822  
 daveascbs@gmail.com

**INVOICE**

**BILL TO**  
 Culp for Congress

**INVOICE** 1677  
**DATE** 08/31/2021  
**TERMS** Due on receipt  
**DUE DATE** 08/31/2021

ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
4'x8' Campaign Sign	2 Sided Full-color 3mm Corrugated Plastic	10	60.00	600.00T
2'x 4' Campaign Sign	2 Sided Full Color Coroplastic Sign	16	16.00	256.00T

Thank you for your order and we appreciate your business.

Please note as of January 1, 2020, the pricing offered on this invoice is for invoices paid in full at the time of order.

If payment arrangements need to be made please reach out to me and let me know so I can adjust your account accordingly.

For all invoices not paid in full at the agreed terms there will be a 20% late fee applied to your invoice.

We understand you need product to make money, so please don't hesitate to call, text or email us to discuss special terms you may need.

Thank you for your business!

<b>SUBTOTAL</b>	856.00
<b>TAX</b>	80.46
<b>TOTAL</b>	936.46
<b>BALANCE DUE</b>	<b>\$936.46</b>

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**INVOICE**

**BILL TO**  
 Culp for Congress

**INVOICE** 1749  
**DATE** 03/10/2022  
**TERMS** Due on receipt  
**DUE DATE** 03/10/2022

ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
2'x 4' Campaign Sign	2 Sided Full Color Coroplastic Sign	12	17.00	204.00T
4'x8' Campaign Sign	2 Sided Full-color 3mm Corrugated Plastic	10	64.00	640.00T

Thank you for your order and we appreciate your business.

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<b>SUBTOTAL</b>	844.00
<b>TAX</b>	79.34
<b>TOTAL</b>	923.34
<b>BALANCE DUE</b>	<b>\$923.34</b>

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**INVOICE**

**BILL TO**  
 Culp for Congress

**INVOICE** 1781  
**DATE** 04/13/2022  
**TERMS** Due on receipt  
**DUE DATE** 04/13/2022

ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
18"x24" Campaign Sign	18"x24" Campaign Sign 2 Sided Full Color 4 online orders	20	4.50	90.00T
Stickers	1x6 stickers	220	0.91	200.20T
Stickers	1.9x13.5	24	2.90	69.60T
Stickers	3.5x25	23	6.30	144.90T
Shipping	Shipping to Customer	1	30.00	30.00T
4'x8' Campaign Sign	2 Sided Full-color 3mm Corrugated Plastic	10	64.00	640.00T
2'x 4' Campaign Sign	2 Sided Full Color Coroplastic Sign	12	17.00	204.00T

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<b>SUBTOTAL</b>	1,378.70
<b>TAX</b>	129.60
<b>TOTAL</b>	1,508.30
<b>BALANCE DUE</b>	<b>\$1,508.30</b>

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**INVOICE**

**BILL TO**  
 Culp for Congress

**INVOICE** 1873  
**DATE** 11/29/2021  
**TERMS** Due on receipt  
**DUE DATE** 11/29/2021

ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
3x5 Flags	Flags	100	13.50	1,350.00T

Thank you for your order and we appreciate your business.

**SUBTOTAL** 1,350.00

Please note as of January 1, 2020, the pricing offered on this invoice is for invoices paid in full at the time of order.

**TAX** 136.35

If payment arrangements need to be made please reach out to me and let me know so I can adjust your account accordingly.

**TOTAL** 1,486.35

For all invoices not paid in full at the agreed terms there will be a 20% late fee applied to your invoice.

**BALANCE DUE** **\$1,486.35**

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Thank you for your business!