



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

April 14, 2025

**VIA UPS DELIVERY AND ELECTRONIC MAIL**

David Prutzman  
7619 144th Street Ct  
Puyallup, WA 98375

RE: MUR 8350  
Culp for Congress

Dear Mr. Prutzman:

This is in reference to the complaint filed with the Federal Election Commission on November 20, 2024, concerning Culp for Congress. Based on that complaint, and after considering the circumstances of this matter and information provided in response to the complaint, the Commission determined to dismiss this matter and close the file effective April 14, 2025.

The General Counsel's Report, which more fully explains the basis for the Commission's decision, is enclosed. Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016).

The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action within 60 days of the dismissal, which became effective today. *See* 52 U.S.C. § 30109(a)(8).

Sincerely,

Lisa J. Stevenson  
Acting General Counsel

*Wanda D. Brown*

BY: Wanda D. Brown  
Assistant General Counsel

Enclosure  
General Counsel's Report

1 **BEFORE THE FEDERAL ELECTION COMMISSION**

2  
3 **ENFORCEMENT PRIORITY SYSTEM**  
4 **DISMISSAL REPORT**

5  
6 **MUR 8350**

**Respondent:** Culp for Congress and Elizabeth  
Curtis in her official capacity as  
treasurer

7  
8  
9  
10 **Complaint Receipt Date:** Nov. 20, 2024

11 **Response Date:** Dec. 12, 2024

12  
13 

14  
15 **Alleged Statutory/  
16 Regulatory Violations:**

52 U.S.C. § 30104(b)  
11 C.F.R. § 104.3(a)(3)(vii)

17  
18 The Complaint alleges that Culp for Congress and Elizabeth Curtis in her official capacity as  
19 treasurer (the “Committee”), the principal campaign committee of Loren Culp,<sup>1</sup> 2022 candidate for  
20 Washington’s 4th Congressional District,<sup>2</sup> failed to disclose debt totaling \$4,854.45 to a vendor, in  
21 violation of the Federal Election Campaign Act of 1971, as amended.<sup>3</sup> The Complaint alleges that  
22 the Committee contracted with a vendor for printing services, received four invoices for work  
23 performed, did not pay the vendor, and failed to disclose the total of the unpaid invoices as an  
24 outstanding debt.<sup>4</sup>

25 In Response, the Committee states that it was unaware of the claimed debt and believed that  
26 it had fully compensated the vendor for services performed and that the invoices were sent to the

---

<sup>1</sup> Culp for Congress, Amended Statement of Organization at 2 (Oct. 13, 2021), <https://docquery.fec.gov/pdf/232/202110139467243232/202110139467243232.pdf>.

<sup>2</sup> Loren Culp, Statement of Candidacy at 1 (Apr. 21, 2021), <https://docquery.fec.gov/pdf/506/202104219445123506/202104219445123506.pdf>.

<sup>3</sup> Compl. at 1 (Nov. 20, 2024).

<sup>4</sup> *Id.*

1 Committee in error.<sup>5</sup> The Commission approved the Committees termination request in December  
2 of 2022, approximately two years before the Complaint was filed.<sup>6</sup>

3 Based on its experience and expertise, the Commission has established an Enforcement  
4 Priority System using formal, pre-determined scoring criteria to allocate agency resources and  
5 assess whether particular matters warrant further administrative enforcement proceedings. These  
6 criteria include (1) the gravity of the alleged violation, taking into account both the type of activity  
7 and the amount in violation; (2) the apparent impact the alleged violation may have had on the  
8 electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in  
9 potential violations and other developments in the law. This matter is rated as low priority for  
10 Commission action after application of these pre-established criteria. Given that low rating and low  
11 apparent dollar amount at issue we recommend that the Commission dismiss the Complaint,  
12 consistent with the Commission's prosecutorial discretion to determine the proper ordering of its  
13 priorities and use of agency resources.<sup>7</sup> We also recommend that the Commission close the file  
14 effective 30 days from the date the certification of this vote is signed (or on the next business day  
15 after the 30th day, if the 30th day falls on a weekend or holiday) and send the appropriate letters.

---

<sup>5</sup> Resp. at 1 (Dec. 12, 2024).

<sup>6</sup> Culp for Congress, Termination Approval 2022 at 1 (Dec. 6, 2022), <https://docquery.fec.gov/pdf/623/202212060300162623/202212060300162623.pdf>.

<sup>7</sup> *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).

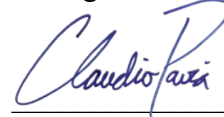
MUR 8350 (Culp for Congress)  
EPS Dismissal Report  
Page 3 of 3

Lisa J. Stevenson  
Acting General Counsel

February 28, 2025

Date

BY:



Claudio J. Pavia  
Deputy Associate General Counsel



Wanda D. Brown  
Assistant General Counsel



Gordon King  
Attorney