



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

April 14, 2025

VIA ELECTRONIC MAIL

liz@lizcurtisassociates.com

Elizabeth Curtis, Treasurer
Culp for Congress
P.O. Box 726
Moses Lake, WA 98837

RE: MUR 8350
Culp for Congress

Dear Ms. Curtis:

On November 21, 2024, the Federal Election Commission notified Culp for Congress (the "Committee,"), and you in your official capacity as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to the Committee at that time.

Upon further review of the allegations contained in the complaint, and information supplied in response, the Commission, on March 12, 2025, voted to dismiss this matter and close the file effective April 14, 2025. The General Counsel's Report, which more fully explains the Commission's decision, is enclosed for your information.

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).

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

10 **Complaint Receipt Date:** Nov. 20, 2024

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

12 

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

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

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,¹ 2022 candidate for
20 Washington’s 4th Congressional District,² failed to disclose debt totaling \$4,854.45 to a vendor, in
21 violation of the Federal Election Campaign Act of 1971, as amended.³ 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.⁴

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

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

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

³ Compl. at 1 (Nov. 20, 2024).

⁴ *Id.*

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

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.⁷ 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.

⁵ Resp. at 1 (Dec. 12, 2024).

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

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


Lisa J. Stevenson
Acting General Counsel

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February 28, 2025

Date

BY:



Claudio J. Pavia
Claudio J. Pavia
Deputy Associate General Counsel



Wanda D. Brown
Wanda D. Brown
Assistant General Counsel



Gordon King
Gordon King
Attorney