

**Complaint Description**

Madison Evans (Wed, 5 Feb 2020 at 3:54 PM)

There is no registered entity named "American Cop" to receive these expenditures. *See WA Secretary of State's Office*. But, according to Culp's F1 personal financial affairs statement, he has a sole proprietorship registered under that name.

In other words, Culp is using campaign funds to transfer a substantial amount of his campaign's money provided by his donors to himself personally.

**What impact does the alleged violation(s) have on the public?**

VIOLATION OF PUBLIC TRUST

**List of attached evidence or contact information where evidence may be found.**

LOREN'S F1 SUMMARY PAGE AS WELL AS:

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**List of potential witnesses with contact information to reach them.****Complaint Certification:**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Attn: Public Disclosure Commission

Date: 1/21/2020

Subject: Illegal personal use of campaign funds by Governor candidate Loren Culp

To Whom it May Concern –

Gubernatorial candidate Loren Culp has been illegally using campaign contributions to illegally enrich himself. This is a clear violation of state law.

Beginning in August 2019, Loren Culp has engaged in, and concealed from his donors and the public, large monthly expenditures from his campaign account to himself to purchase his own book, “American Cop.” Please see the below expenditures:

Recipient Name	Date	Description	Amount	Report
AMERICAN COP	10/26/2019	INV# 000002 100 AMERICAN COP BOOKS	1,500.00	C4
AMERICAN COP	8/16/2019	150 AMERICAN COP BOOKS	1,500.00	C4
AMERICAN COP	10/26/2019	INV# 000003 100 AMERICAN COP AUDIO BOOKS	1,500.00	C4
AMERICAN COP	12/15/2019	INV# 000004 150 BOOKS/CDS @ \$15 EACH	2,250.00	C4

There is no registered entity named “American Cop” to receive these expenditures. See *WA Secretary of State’s Office*. But, according to Culp’s F1 personal financial affairs statement, he has a sole proprietorship registered under that name.

In other words, Culp is using campaign funds to transfer a substantial amount of his campaign’s money provided by his donors to himself personally.

RCW 42.17A.435 provides that: *“no contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment”*.

This is also a clear violation of an additional state law:

RCW 42.17A.445 provides that: *“contributions received and reported in accordance with RCW 42.17A.220 through 42.17A.240 and 42.17A.425 may only be paid to a candidate, or a treasurer or other individual or expended for such individual's personal use under the following circumstances.”*

Those circumstances include: 1) reimbursements for documented lost earnings, 2) reimbursement for campaign-related expenses, and 3) repayments for properly documented candidate loans. None of those circumstances are applicable here.

By fabricating and using a fictitious vendor name to cover up and conceal that Culp was transferring campaign funds to a personal account, Culp clearly violated state law, specifically RCW 42.17A.435.

It is also worth noting that the prices Culp's campaign is purchasing his books at are the same full-freight prices listed on "www.ChiefCulp.com," one of the places where Culp sells his book. This leaves significant room for Culp to profit from the purchase. See *attachment*.

Additionally, RCW 42.17A.710 provides in relevant part that: *"(1) The statement of financial affairs required by RCW 42.17A.700 shall disclose the following information for the reporting individual and each member of his or her immediate family: (f) The name and address of each governmental entity, corporation, partnership, joint venture, sole proprietorship, association, union, or other business or commercial entity from whom compensation has been received in any form of a total value of \*two thousand dollars or more; the value of the compensation; and the consideration given or performed in exchange for the compensation;"*

Despite this requirement, Loren Culp has neglected to report the income made from the sale of his book. This is also a clear violation of state law.

### Conclusion

Finally, the PDC should examine a) whether or not Culp is personally profiting from his campaign "swag-store" where Culp is selling a wide variety of coffee mugs, baseball caps, hoodies, and beanies, and b) whether or not campaign contributions received through the store are being properly disclosed to the public. See <https://culpforgovernor.com/shop/page/>.

These are serious violations of state law and so the PDC should launch an investigation into Culp's behavior immediately.

Sincerely,