

Christopher Gergen (Tue, 3 Mar 2020 at 12:12 PM)
to: "PDC Support" pdcc@pdc.wa.gov

March 2, 2020

Washington Public Disclosure Commission
711 Capitol Way, Room 206
Post Office Box 40908
Olympia, Washington 98504-0908

Case Number: 64331
Filed: February 5, 2020
Complaint Filed by: Madison Evans

Public Disclosure Officer:

We are writing in response to the complaint dated February 5, 2020, regarding alleged violations of RCW 42.17A.445 for the Culp for Governor Campaign. The accusations are based on a premise that there was personal use of campaign contributions because expenditures were made to a business that *the accuser felt is fictitious*.

The following information will show that Loren Culp has followed all proper laws and regulations in conducting his personal business and the operations of his campaign.

"American Cop" is a legal entity. The Secretary of State's website only discloses Corporations and LLC's. Had the Department of Revenue website been checked, the accuser would have discovered that "American Cop" is properly registered as a sole proprietorship, UBI # 604-404-877 (Exhibit A). He has a proper reseller certificate as a wholesaler of books and has filed all combined excise tax reports and remits its sales tax in a timely manner. "American Cop" operates as a direct sales business www.chiefculp.com and to a variety of customers. The campaign is only one of many customers for this business.

"American Cop" files tax returns with the Department of Revenue. "American Cop" legally and properly sold its autographed books to the Culp campaign at fair market value. The campaign properly reported the purchase of the books. Book purchases are not a unique transaction. Campaigns routinely purchase merchandise from vendors to give away or sell to supporters--to include books.

Additionally, we are providing the requested information regarding the sale of books from the publisher to the vendor "American Cop" to the campaign.

During the period August through the end of the year, the campaign purchased 450 books from the "American Cop" bookseller. The \$15.00 per book payment included a sales tax of 7.7%; therefore, the campaign purchased books at a price of \$13.93 per book (sales tax \$1.07) for a total purchase price of \$6,268.50. This represents the Gross Revenue to "American Cop".

"American Cop" purchased the books from O'Leary Publishing, LLC at a cost of \$5.50 per book for a total purchase price of \$2,475.00. Attached are the invoices to the publisher.

Our position is the Culp for Governor campaign properly disclosed "American Cop" on the initial Financial Disclosure forms for Mr. Culp's campaign, "American Cop" is a properly registered legal entity with the State of Washington, is not a fictitious company, has a properly registered reseller number, and "American Cop" pays taxes to the State of Washington in compliance with all state regulations. There never has been any impropriety or violation of the public trust or violation of any PDC or Washington State regulations regarding either the Culp for Governor campaign or the American Cop entity. It is for these reasons that we respectfully request these false accusations to be dismissed.

Sincerely,

Culp for Governor

O'Leary Publishing, LLC

28089 Vanderbilt Dr, Ste 202
Bonita Springs, FL 34134 US
2397773241
april@olearypublishing.com
www.olearypublishing.com



INVOICE

BILL TO

Loren Culp
Loren Culp
38 Goa Way
Republic, WA 99166
United States

INVOICE # 1070

DATE 10/24/2019

DUE DATE 10/24/2019

TERMS Due on receipt

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
10/24/2019	Wholesale Book Order		132	5.50	726.00

BALANCE DUE

\$726.00

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INVOICE

BILL TO

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38 Goa Way
Republic, WA 99166
United States

INVOICE # 1076

DATE 12/04/2019

DUE DATE 12/05/2019

TERMS Due on receipt

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
12/04/2019	Wholesale Book Order	3 Cases of American Cop	132	5.50	726.00

BALANCE DUE

\$726.00

O'Leary Publishing, LLC

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INVOICE

BILL TO

Loren Culp
38 Goa Way
Republic, WA 99166
United States

INVOICE # 1078

DATE 12/30/2019

DUE DATE 12/30/2019

TERMS Due on receipt

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
12/30/2019	Wholesale Book Order	American Cop- 4 Cases	176	5.50	968.00

BALANCE DUE

\$968.00