



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

March 10, 2020

Delivered electronically to “loren@culpforgovernor.com”

Subject: Complaint filed by Martin “Iceman” Wheeler, PDC Case 66554

Dear Loren Culp:

Below is a copy of an electronic letter sent to Martin “Iceman” Wheeler concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Iceman Wheeler, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

/s

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Fox Blackhorn  
Compliance Coordinator 2



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March 10, 2020

Delivered electronically to “wheeler202campaign@gmail.com”

Subject: Complaint regarding Loren Culp, PDC Case 66554

Dear Martin “Iceman” Wheeler:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 5, 2020. The complaint alleged that Loren Culp (Respondent), a 2020 candidate for Governor of Washington State may have violated RCW 42.17A.240 and WAC 390-16-034 for failure to accurately and completely disclose contributions and contributors.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- The complaint alleged that the Respondent failed to accurately and completely disclose contributor employers and occupations for contributions above \$50.
- RCW 42.17A.240 and WAC 390-16-034 require disclosure of employers and occupations for contributors giving more than \$100, which the Respondent provided.
- The complaint alleged that a \$500 loan from the candidate’s personal funds was required to be reported as a contribution on a Monetary Contributions report (C-3 report), much like its repayment was disclosed as an expenditure on a Summary Full Campaign Contribution and Expenditure report (C-4 report).
- The Respondent properly reported loans on the Schedule L, which appears on the C-4 summary page in the aggregate contribution total until the point it is discharged by an expenditure, when it then is added to the aggregate expenditure total.

Based on our findings staff has determined that, in this instance, no evidence supports a finding of a violation that warrants further investigation.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

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If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

/s

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Fox Blackhorn  
Compliance Coordinator 2

cc: Loren Culp