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May 20, 2016

Jeff S. Jordan
 Assistant General Counsel
 Federal Election Commission
 Office of Complaints Examination
 and Legal Administration
 Attn: Mary Beth deBeau, Paralegal
 999 E Street NW
 Washington, DC 20436

Re: MUR 7058

Dear Mr. Jordan:

This response is submitted on behalf of Congressman Duncan D. Hunter (“Respondent”) with respect to a complaint designated as MUR 7058 that was filed with the Federal Election Commission (“Commission”) by Citizens for Responsibility and Ethics in Washington, also known as CREW (“Complaint”). This response is timely submitted by May 20, 2016. For the reasons discussed herein, the Commission should determine on the face of the Complaint that no law or regulation was violated by Respondent, and that the Complaint should be promptly dismissed.

Prior to receiving the Complaint, Duncan D. Hunter for Congress (“Committee”) proactively address some expenditure issues that had come to its attention. The Committee promptly took corrective action in consultation with the Reports and Analysis Division (“RAD”) of the Federal Election Commission. The Committee filed amendments to ensure full disclosure of potentially impermissible expenditures and noted the date on which Congressman Hunter reimbursed the campaign for those expenditures. Prior to filing the amendments, the Committee’s Treasurer reviewed the best practices to make these disclosures on the amended reports to ensure a complete and accurate public record. The Committee also reduced the number of individuals with direct access to campaign funds by closing credit card accounts and deactivating debit cards.

The Committee has since engaged me as counsel and is undergoing an independent financial review. In light of these already ongoing actions, we believe that this matter is being properly handled by RAD and does not rise to the need or level of review by the Office of General Counsel.

Should you have any questions regarding this matter, I may be reached at (202) 517-0585.

Very truly yours,



Elliot S. Berke