

**FEDERAL ELECTION COMMISSION**  
**FIRST GENERAL COUNSEL'S REPORT**

**MUR: 7058**

COMPLAINT FILED: 4/29/16  
SUPPLEMENTS FILED: 5/11/16, 6/21/16  
NOTIFICATIONS: 5/05/16, 5/18/16, 6/27/16  
RESPONSES: 5/20/16, 7/08/16, 11/22/16  
ACTIVATED: 6/09/17

## ELECTION CYCLES: 2012 – 2016 SOL: 9/12/16 – 10/14/21

## **COMPLAINANT:**

Noah Bookbinder,  
Citizens for Responsibility and Ethics in  
Washington

## RESPONDENTS:

Duncan D. Hunter for Congress and Chris Marston  
in his official capacity as treasurer  
Rep. Duncan D. Hunter  
Margaret Hunter

**MUR: 7228**

COMPLAINTS FILED: 3/29/17 – 4/10/17  
NOTIFICATIONS: 4/03/17 – 4/11/17  
RESPONSE: 6/01/2017  
ACTIVATED: 6/09/17

## ELECTION CYCLES: 2016 – 2018 SOL: 1/02/2020 – 1/23/2022

## COMPLAINANTS:

(See Appendix)

## RESPONDENTS:

Duncan D. Hunter for Congress and Chris Marston  
in his official capacity as treasurer  
Rep. Duncan D. Hunter

MUR: 7233

COMPLAINT FILED: 4/03/17  
NOTIFICATIONS: 4/13/17  
RESPONSE: 6/01/2017  
ACTIVATED: 6/09/17

ELECTION CYCLES: 2016  
SQL: 1/06/2020 – 11/29/2021

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1                   **COMPLAINANT:**

Nicole Carroll

2                   **RESPONDENTS:**

Duncan D. Hunter for Congress and Chris Marston  
5                   in his official capacity as treasurer

6                   Rep. Duncan D. Hunter

7                   Margaret Hunter

8                   **RELEVANT STATUTES**

52 U.S.C. § 30104(b)(6)(A)

9                   **AND REGULATIONS:**

52 U.S.C. § 30114(b)

10                   11 C.F.R. § 104.3(b)(4)

11                   11 C.F.R. § 113.1(g)

12                   **INTERNAL REPORTS CHECKED:**

13                   Disclosure Reports

14                   **FEDERAL AGENCIES CHECKED:**

15                   **I. INTRODUCTION**

16                   These matters involve allegations that Rep. Duncan D. Hunter, his

17                   wife, and Duncan D. Hunter for Congress and Chris Marston in his official capacity as treasurer

18                   (the “Committee” or “DDHC”), Rep. Hunter’s principal campaign committee, violated the

19                   Federal Election Campaign Act of 1971, as amended (the “Act”) by converting campaign funds

20                   to personal use. Respondents admit that DDHC made personal disbursements but deny that there

21                   was any violation of the Act or Commission regulations because the Hunters have reimbursed

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1 the Committee for the personal spending and DDHC has amended its disclosure reports to  
2 identify the impermissible disbursements. Respondents do not specifically identify who was  
3 responsible for making the improper payments. They generally assert, without providing any  
4 detail, that some of the disbursements were mistaken, unauthorized, or inadvertently charged.

5 The available information indicates that the Hunters used DDHC funds for their personal  
6 expenses, including travel, jewelry, tuition, utilities, food, gasoline, online video games,  
7 healthcare, household repair, retail purchases, and theme park visits, among other things. The  
8 Hunters have repaid \$65,962 to the Committee, but their reimbursements (most of which post-  
9 date the initial complaint and widespread media coverage and were made upwards of a year or  
10 more after the related disbursements) do not vitiate the apparent violations resulting from their  
11 improper use of campaign funds. Moreover, it appears that the Hunters have not fully  
12 reimbursed the Committee for their admitted personal disbursements,<sup>2</sup> and there are other  
13 disbursements, totaling approximately \$32,000 or more, that may have been personal use, based  
14 on the available facts discussed below.

15 Therefore, we recommend that the Commission find reason to believe that Rep. Hunter,  
16 Margaret Hunter, and DDHC violated 52 U.S.C. § 30114(b) by converting campaign funds to  
17 personal use, and also find reason to believe that DDHC violated 52 U.S.C. § 30104(b)(6)(A) by  
18 failing to accurately report disbursements. We also recommend that the Commission authorize  
19 an investigation to complete the factual record and determine whether Respondents' conduct was  
20 knowing and willful.

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<sup>2</sup> There are apparent mathematical errors in Respondents' filings. Based on our reconciling of those errors, it appears that DDHC admitted to \$70,726 in personal disbursements but the Hunters' aggregate reimbursement payments were only \$65,962, which would mean that \$4,764 has not yet been reimbursed.

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1     **II. FACTUAL BACKGROUND**

2           Rep. Duncan D. Hunter has been the congressman from California's 50th congressional  
 3           district since 2013, and previous to that he represented California's 52nd congressional district  
 4           since 2009. Margaret Hunter, his wife, receives a salary from DDHC for "campaign consulting"  
 5           and "campaign management services."<sup>3</sup> Rep. Hunter has publicly stated that he and Margaret  
 6           Hunter were the sole holders of the only two credit cards issued by DDHC during the relevant  
 7           period.<sup>4</sup> Almost all of the alleged personal spending was apparently made using the two  
 8           campaign credit cards.<sup>5</sup>

9           The improper spending can be divided into the following four categories, which are  
 10          discussed in further detail in Sections II.A-D below: (1) 112 disbursements totaling at least  
 11          \$18,939 reported on the Committee's original reports with the word "personal" or "mistaken";  
 12          (2) several hundred disbursements totaling at least \$48,642 initially reported with campaign-  
 13          related purposes, but later disclosed as personal in a Miscellaneous Report; (3) over 100  
 14          additional disbursements totaling approximately \$32,000 reported with campaign-related  
 15          purposes, but that may have been personal use based on the available information; and (4) salary  
 16          payments (\$3,000 per-month) and reimbursements totaling \$15,619 from the Committee to  
 17          Margaret Hunter that are alleged to have not been for *bona fide* campaign work.

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<sup>3</sup>       See, e.g., DDHC 2017 Apr. Quarterly Rpt. at 53 (Apr. 15, 2017).

<sup>4</sup>       Morgan Cook, *Hunter Repaid Funds Spent on Surf Shop, Garage Door*, SAN DIEGO UNION-TRIBUNE, Apr. 19, 2016 (cited by MUR 7058 Compl. at 3 (Apr. 29, 2016)); Olivia Nuzzi, *Trump's Guy, Rep. Duncan Hunter, Spent Campaign \$\$\$ at Disney*, DAILY BEAST, Apr. 10, 2016 (cited by MUR 7058 First Supp. Compl. at 1 (May 11, 2016)); Morgan Cook, *Did Hunter Campaign Pay for his Kids' School Lunches?*, SAN DIEGO UNION-TRIBUNE, June 15, 2016 (attached to MUR 7058 Second Supp. Compl. (July 21, 2016)).

<sup>5</sup>       This is based on statements in the Responses and notations in the Committee's disclosure reports. See, e.g., MUR 7058 Second Supp. Resp. (Nov. 21, 2016), Attach. at 1 (DDHC Misc. Report to FEC) (Nov. 16, 2016).

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1                   **A. Disbursements Reported on Original Disclosure Reports With the Word**  
 2                   **“Personal” or “Mistaken” Listed as the Purpose**

3                   Between March 31, 2015 and March 29, 2016, DDHC made 112 disbursements totaling  
 4                   at least \$18,939 that, with few exceptions, were reported with the word “personal” or “mistaken”  
 5                   on the Purpose of Disbursement line on the original disclosure reports.<sup>6</sup> They were apparently  
 6                   related to the Hunters’ personal lives. For instance, the disbursements included payments to the  
 7                   private school attended by their children, allegedly for tuition, and payments to fix the garage  
 8                   door of their residence.<sup>7</sup> In addition, a series of “mistaken” cash withdrawals were made directly  
 9                   to Margaret Hunter.

10                  The Hunters reimbursed some disbursements while the spending was in progress, Rep.  
 11                  Hunter reimbursed others after the Committee’s spending issues were reported in the media, and  
 12                  additional disbursements have yet to be reimbursed.<sup>8</sup> The initial reimbursement payments were  
 13                  made in June 2015 (Rep. Hunter) and October 2015 (Mrs. Hunter).<sup>9</sup> Afterwards, the Hunters  
 14                  apparently continued to make “personal” and “mistaken” disbursements. However, on April 4,  
 15                  2016, the Commission’s Reports Analysis Division (“RAD”) issued a Request for Additional  
 16                  Information (“RFAI”)<sup>10</sup> regarding “personal” disbursements that resulted in widespread media

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<sup>6</sup>                  Attachment 1 to this Report lists all of the relevant disbursements. *E.g.*, “Personal Expense – To Be Paid Back” and “Mistaken Charge – To Be Reimbursed.” A handful were unitemized but identified as “Mistaken Charges” on miscellaneous text forms attached to disclosure reports.

<sup>7</sup>                  MUR 7058 Compl. at 4-5.

<sup>8</sup>                  After each of the reimbursements, DDHC amended the relevant reports to reflect that the disbursements had been repaid. *E.g.*, “Mistaken Transaction – Refunded 4/5/2016.”

<sup>9</sup>                  DDHC Amended 2015 July Quarterly Rpt. at 66 (Apr. 15, 2016) (reimbursement of \$5,245.71 from Rep. Hunter on June 20, 2015); DDHC Amended 2015 Year-End Rpt. at 29 (Apr. 15, 2016) (reimbursement of \$169.21 from Margaret Hunter on October 21, 2015).

<sup>10</sup>                 See Letter from Bradley Matheson, Sr. Campaign Finance & Reviewing Analyst, RAD to Chris Marston, Treasurer, DDHC (Apr. 4, 2016) (requesting additional information regarding one disbursement to Christian Unified

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1 coverage.<sup>11</sup> Rep. Hunter almost immediately made reimbursements totaling \$11,896 — no  
 2 “personal” or “mistaken” disbursements have been reported since then.<sup>12</sup> Despite the Hunters’  
 3 aggregate \$17,311 reimbursement payments, it appears that at least \$1,302 in disbursements to  
 4 Legoland and Steam Games have not yet been reimbursed.<sup>13</sup>

5 ***Figure 1. “Personal” and “Mistaken” Disbursements***

<b>Category</b>	<b>Amount</b>	<b>Reimbursed</b>	<b>Outstanding Balance</b>
Hawaii Trip	\$6,289	\$6,289	\$0
Online Video Games	\$1,556	\$254	\$1,302
Oral Surgery Clinic	\$1,137	\$1,137 <sup>14</sup>	\$0
Private School	\$6,150	\$6,150	\$0
Payments to Margaret Hunter	\$2,023	\$2,023	\$0
Garage Door Repair	\$1,200	\$1,200	\$0
Retail Stores	\$583	\$583	\$0
Theme Parks	<i>Unknown</i>	\$0.50	<i>Unknown</i>
<b>Total</b>	<b>\$18,939+</b>	<b>\$17,311</b>	<b>\$1,302+</b>

6 Respondents do not explain what (or who) caused this spending or why it continued for  
 7 so long. Rep. Hunter, mostly through his spokesperson, has offered various explanations to the  
 8 news media suggesting it was a series of mix-ups, but information contained in the MUR 7058  
 9 Complaint and public record suggests that some of those explanations may not be accurate.<sup>15</sup>

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Schools reported as “Personal Expense – To Be Paid Back” and 67 disbursements to Steam Games also reported as “Personal Expense – To Be Paid Back”).

<sup>11</sup> See e.g., Brendan O’Connor, *The Vaping Congressman Spent \$1,302 of His Campaign Funds Last Year on Video Games*, GAWKER, Apr. 5, 2016.

<sup>12</sup> DDHC Pre-Primary Rpt. at 27 (May 26, 2016) (reimbursements of \$6,150 on April 5, 2016, and \$5,746 on April 8, 2016, from Rep. Hunter).

<sup>13</sup> The disbursement to Legoland was unitemized and DDHC has not disclosed the amount. Based on our calculations, Rep. Hunter repaid only \$0.50, but the true amount is likely to have been larger. The disbursements to Steam Games were amended to “Fraudulent Charge[s] – Refunded 4/5/16,” but DDHC has not reported the receipt of any refunds, and there is information suggesting the charges were not actually fraudulent. See *infra* note 41.

<sup>14</sup> Includes a \$326 refund from the Center for Oral & Facial Surgery.

<sup>15</sup> See MUR 7058 Compl. at 4-5.

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1                   **B. Disbursements Initially Reported With Campaign-Related Purposes but**  
 2                   **Later Identified as “Personal Expenditures” on a Miscellaneous Report**

3                   After the April 4, 2016 RFAI was issued and the MUR 7058 Complaint was filed, DDHC  
 4                   completed an “independent financial review” of its 2016 election cycle activity and filed a  
 5                   November 16, 2016 Miscellaneous Report listing numerous additional “personal expenditures.”  
 6                   Respondents also filed a supplement in MUR 7058, attaching the Miscellaneous Report.<sup>16</sup> The  
 7                   Miscellaneous Report does not identify who or what caused the spending, but makes vague  
 8                   assertions that the disbursements were “unauthorized” or “inadvertently charged.”<sup>17</sup> As  
 9                   discussed further below, each of the disbursements was initially reported with an apparent  
 10                   campaign-related purpose. Despite admitting that the disbursements were personal, DDHC has  
 11                   not amended the relevant disclosure reports.

12                   Rep. Hunter repaid \$48,651 to the Committee,<sup>18</sup> which is *slightly more* than the total of  
 13                   the amounts listed on the Miscellaneous Report (\$48,642). However, we calculate that the  
 14                   “personal expenditures” add to \$51,788 (and include 348 individual disbursements) based on the  
 15                   actual amounts disclosed in the Committee’s reports.

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<sup>16</sup>                   MUR 7058 Second Supp. Resp., Attach. (DDHC Misc. Report to the FEC) (Nov. 16, 2016). The report also states that, “out of an abundance of caution, the campaign has deemed any expense without adequate support as necessary for reimbursement.” *Id.* at 1. Because lack of documentation has no bearing on whether a disbursement was made irrespective of a campaign, we consider any such item to be a personal disbursement, especially given that the subject line is “Duncan D. Hunter repayment of personal expenditures.” *Id.*

<sup>17</sup>                   *Id.*

<sup>18</sup>                   DDHC 2016 Post-General Election Rpt. at 18 (Dec. 8, 2016).

1        **Figure 2. “Personal Expenditures” on Nov. 16, 2016 Miscellaneous Report**

Category	Amount Listed on Misc. Report	Amount on DDHC Disclosure Reports	Difference
Travel	\$14,913	\$14,913	\$0
Utilities	\$2,743	\$4,473	\$1,730
Food	\$7,089	\$7,029	(\$60)
Retail Stores	\$14,628	\$16,182	\$1,554
Gasoline	\$6,036	\$5,957	(\$78)
Theme Parks	\$1,249	\$1,249	\$0
Miscellaneous	\$1,984	\$1,984	\$0
<b>Total</b>	<b>\$48,642</b>	<b>\$51,788</b>	<b>\$3,145</b>

2        There are multiple examples of personal disbursements that, based on the available  
 3 information, were clearly related to the Hunters’ personal lives. First, there were payments to  
 4 Ki’s Restaurant, which delivered school lunches to Christian Unified Schools, attended by the  
 5 Hunters’ children.<sup>19</sup> The disbursements were made during the school year, and the restaurant’s  
 6 website allows parents to add value to their children’s account using a credit card.<sup>20</sup> Second,  
 7 there was a purchase at Educational Outfitters, which supplied uniforms for Christian Unified  
 8 Schools.<sup>21</sup> Third, there were payments to FEIS Productions, the children’s traditional Irish dance  
 9 competition at which the Hunters’ daughter competed.<sup>22</sup> Fourth, there were payments in Italy at  
 10 the same time as when Rep. Hunter posted a photograph on his personal social media account of  
 11 him and his wife enjoying what appears to be the Amalfi coastline.<sup>23</sup> The disbursements

<sup>19</sup> MUR 7058 Second Supp. Compl. at 2-3.

<sup>20</sup> *Id.* at 3.

<sup>21</sup> MUR 7058 Compl. at 6.

<sup>22</sup> *Results: - Feis Productions*, <http://www.feisinfo.com/results/schooldetails.php?feisid=78&school=Rose-Ritchie+Academy+of+Irish+Dance> (Results of Hidden Valley Feis 2015).

<sup>23</sup> MUR 7058 Compl. at 5-6.

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1 occurred in multiple Italian cities and coincided with Thanksgiving. One disbursement was to a  
 2 Florentine jewelry store disclosed with “Food/Beverages” as the purpose.<sup>24</sup>

3 Fifth, there were disbursements in Boise, Idaho for travel, accommodations, and  
 4 recreation at the same time as when Rep. Hunter posted photographs to his personal social media  
 5 account of his family floating down and fishing the Boise River.<sup>25</sup> There were also payments at  
 6 rest areas in California and Nevada, along the route from Southern California, suggesting that the  
 7 Hunters were on a road trip. Sixth, there were payments at a Disneyland gift shop and restaurant  
 8 at the same time as when Rep. Hunter posted a photograph to his personal social media account  
 9 of his family riding Space Mountain.<sup>26</sup> Seventh, there were disbursements for water, electricity,  
 10 and Internet at the same time as when Rep. Hunter was apparently using his personal residence  
 11 as campaign headquarters.<sup>27</sup>

12 These disbursements were reported with descriptions that implied a campaign-related or  
 13 charitable purpose. For example, there are payments to: (1) Hotel L’Ancora, a hotel in Positano,  
 14 Italy, described as “Catering & Venue;” (2) FEIS Productions, the children’s dance competition,  
 15 described as “Event Entertainment;” (3) the North Face, at which a purchase was made during  
 16 the Boise trip, described as “Fundraiser for Local Groups;” and (4) Educational Outfitters, the  
 17 uniform outfitter for Christian Unified Schools, described as “Gift Certificate for Donation to  
 18 Local Organization Event.” It is unknown who produced or verified these descriptions.

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<sup>24</sup> *Id.* at 5.

<sup>25</sup> *Duncan Duane on Instagram: Boise River Float*, <https://www.instagram.com/p/42vMAsk6kS> (uploaded July 7, 2015). Included among the Boise-related disbursements is a payment to Epleys Boise River Rental.

<sup>26</sup> *Duncan Duane on Instagram: SpaceX Mountain*, [https://www.instagram.com/p/8XF\\_yek6uU](https://www.instagram.com/p/8XF_yek6uU) (uploaded on Oct. 2, 2015). The payments to Disneyland were made on September 28, 2015.

<sup>27</sup> MUR 7058 Compl. at 6; MUR 7058 First Supp. Compl. at 2.

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1                   **C.     Additional Disbursements That May Have Been Personal Use**

2                   The available information indicates that there may be other disbursements, totaling over  
3                   \$32,000 (\$21,600 within the statute of limitations period), that may have been personal use but  
4                   have yet to be reimbursed or acknowledged by the Hunters.<sup>28</sup> First, although the November 16,  
5                   2016 Miscellaneous Report acknowledges many of the personal use allegations in the MUR  
6                   7058 Complaint, there are still remaining allegations (disbursements totaling \$2,045). For  
7                   instance, there are \$315 in payments to Hotel San Gallo Palace in Florence during the Italy trip,  
8                   and \$1,326 in payments to Haggen grocery store (Respondents admitted that payments to other  
9                   grocery stores were personal).<sup>29</sup> Second, DDHC's disclosure reports include approximately  
10                  \$30,000 in disbursements that are substantially similar or apparently connected to the admitted  
11                  personal disbursements, raising questions of personal use. Specifically, they include  
12                  disbursements made for groceries, an oil change, gasoline, travel, retail store purchases, and  
13                  dining at a fast food restaurant.

14                   **D.     Salary and Reimbursement Payments to Margaret Hunter**

15                   The MUR 7058 Complaint alleges that Margaret Hunter may not have performed *bona*  
16                  *fide* work in exchange for her \$3,000 (formerly \$2,000) per-month salary and, further, that  
17                  reimbursement payments she received from DDHC (totaling \$15,619) may have been for  
18                  personal expenses.<sup>30</sup> The allegations are based mostly on the fact that she was an apparent  
19                  beneficiary of the personal spending described above. Respondents have neither denied the

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<sup>28</sup> Attachment 2 to this Report lists all of the relevant disbursements.

<sup>29</sup> See MUR 7058 Compl. at 5; MUR 7058 First Supp. Compl. at 2.

<sup>30</sup> MUR 7058 Compl. at 7. From September 2011 through December 2012 and January 2014 through February 2017, Margaret Hunter received a monthly salary from DDHC of \$2,000 and \$3,000, respectively.

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1 allegations, nor have they explained Margaret Hunter's duties and responsibilities for the  
 2 campaign.

3 **III. LEGAL ANALYSIS**

4 **A. There is Reason to Believe that Respondents Converted Campaign Funds to  
 5 Personal Use in Violation of 52 U.S.C. § 30114(b)**

6 The Act provides that campaign funds “shall not be converted by any person to personal  
 7 use,” and defines personal use as using funds “to fulfill any commitment, obligation, or expense  
 8 of a person that would exist irrespective of the candidate’s election campaign or individual’s  
 9 duties as holder of Federal office.”<sup>31</sup> Examples of personal use, as outlined in the statute,  
 10 include utility payments, non-campaign related automobile expenses, vacations or other non-  
 11 campaign related trips, household food items, and tuition payments.<sup>32</sup>

12 The Commission’s implementing regulation enumerates types of disbursements that are  
 13 *per se* personal use.<sup>33</sup> These include household food items or supplies, tuition payments other  
 14 than those associated with training campaign staff, utility payments for any part of any personal  
 15 residence of the candidate, salary payments to a member of the candidate’s family unless the  
 16 family member is providing *bona fide* services and the payments are not in excess of the fair  
 17 market value, and vacations.<sup>34</sup> For all other disbursements, the regulation provides that the  
 18 Commission shall determine on a case-by-case basis whether a given disbursement is personal

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<sup>31</sup> 52 U.S.C. § 30114(b). Permitted uses of campaign funds include, among other things, charitable donations and any other lawful purpose that is not personal use. *Id.* § 30114(a)(1)-(6); *see* 11 C.F.R. § 113.2.

<sup>32</sup> *Id.* § 30114(b)(2).

<sup>33</sup> 11 C.F.R. § 113.1(g)(1)(i).

<sup>34</sup> *Id.* § 113.1(g)(1)(i)(A), (D), (E)(1), (F), (H), (J).

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1 use by applying the “irrespective test” formulated in the statute.<sup>35</sup> Meal, travel, and vehicle  
 2 expenses are examples of disbursements that may be personal use.<sup>36</sup>

3       The available information indicates that Respondents violated the Act by converting  
 4 campaign funds to personal use.<sup>37</sup> They admit that DDHC used \$65,962 in campaign funds for  
 5 personal disbursements, which we calculate to be \$70,726. Although Respondents do not  
 6 provide any details explaining the circumstances surrounding the disbursements, it appears that  
 7 the Hunters were directly responsible. First, it was the Hunters who reimbursed the Committee  
 8 for the admitted personal disbursements. Second, the Hunters were in control of the campaign  
 9 credit cards during the relevant period. Third, it appears that numerous admitted personal  
 10 disbursements were connected to the Hunters’ personal lives.

11       There is no basis to support Respondents’ vague assertions that disbursements were  
 12 “inadvertent” or “unauthorized.”<sup>38</sup> Given Rep. Hunter’s years of experience as a candidate and  
 13 congressman and Margaret Hunter’s years of experience as a salaried campaign official, it is  
 14 questionable that they were capable of making hundreds of inadvertent purchases with the wrong  
 15 credit card over multiple reporting periods and failed to notice that their personal funds were not  
 16 used to pay for significant life expenses. Moreover, it appears that the Hunters were aware that  
 17 spending campaign funds on personal items was impermissible. They made reimbursements in  
 18 June and October 2015 for “personal” and “mistaken” spending, but apparently continued to use  
 19 campaign funds for personal spending until shortly before the April 4, 2016 RFAI.

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<sup>35</sup>       *Id.* § 113.1(g)(1)(ii).

<sup>36</sup>       *Id.*

<sup>37</sup>       We note that the MUR 7058 Complaint provides little information to support the allegations involving Margaret Hunter’s salary and reimbursement payments. However, we expect that analysis to benefit from facts obtained during the investigation.

<sup>38</sup>       See Misc. Rpt. at 1. It is unclear what Respondents mean by “unauthorized.” They do not contend that anyone other than the Hunters were responsible for making the disbursements.

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1                    Respondents' argument that there was no violation because Rep. Hunter reimbursed  
 2 DDHC which amended its disclosure reports is erroneous. Although reimbursements may  
 3 mitigate a violation, they do not absolve Respondents of liability.<sup>39</sup> Indeed, Rep. Hunter did not  
 4 reimburse the Committee for over \$48,000 in personal disbursements until after the MUR 7058  
 5 Complaint was filed. In addition, many of the other reimbursements were made in response to  
 6 the RFAI and subsequent widespread news coverage months after the original disbursements  
 7 were made. Furthermore, it appears that the Hunters have not fully reimbursed the Committee  
 8 for the disbursements which Respondents have admitted were personal in nature (we calculate  
 9 that \$4,764 likely remains outstanding). And, as described above, there may \$32,000 of more in  
 10 personal disbursements that have neither been admitted nor reimbursed.

11                  In conclusion, based on the available information, it appears that Rep. Hunter, Margaret  
 12 Hunter, and DDHC converted campaign funds to personal use. Therefore, we recommend that  
 13 the Commission find reason to believe that each violated 52 U.S.C. § 30114(b).

14                  **B.      There is Reason to Believe That DDHC violated 52 U.S.C. § 30104(b)(6)(A)  
 15                  by Failing to Accurately Report Disbursements**

16                  Political committees shall disclose the name and address of each person who has received  
 17 a disbursement in an aggregate amount or value in excess of \$200 within the calendar year or

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<sup>39</sup> The circumstances of this matter — *i.e.*, significant number and amount of personal disbursements, long duration of spending, majority of reimbursements post-dating the initial complaint, limited information about the spending, and additional suspicious disbursements — are dissimilar from prior matters involving personal use where the Commission has voted to dismiss. *See, e.g.*, MUR 6609 (Friends of Connie Mack) (committee addressed a campaign employee's purchase of clothes at a department store before complaint was filed); MUR 6511 (Robert Andrews U.S. House Committee) (candidate repaid campaign for expenses relating a Scotland trip when the campaign-related nature of the trip was questioned by media reports); *see also* MUR 6127 (Obama for America) (caution letter issued to candidate who used campaign funds to pay for trip to visit dying relative).

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1 election cycle, in the case of an authorized committee, together with the date, amount, and  
 2 purpose of any such disbursement.<sup>40</sup>

3 As described above, DDHC failed to accurately describe the purpose of over \$50,000 in  
 4 disbursements that were actually converted to personal use. For example, at least \$48,651 in  
 5 disbursements initially disclosed with campaign-related purposes were subsequently identified  
 6 on the November 16, 2016 Miscellaneous Report as "personal expenditures." There have been  
 7 no amendments. In addition, it appears that DDHC inaccurately reported online video game  
 8 purchases totaling \$1,302 as "Fraudulent Charge[s] – Refunded 4/5/16" when DDHC in fact  
 9 disclosed no actual refunds.<sup>41</sup>

10 Finally, DDHC failed to itemize several disbursements exceeding the aggregate \$200  
 11 threshold, including payments to: (1) Steam Games (unknown amount) on April 28, 2015,  
 12 because during the same election cycle, DDHC reported other disbursements totaling \$1,424 to  
 13 Steam Games; (2) Firenze S.M.N. Self Service (\$320) sometime in 2015; and (3) Rubio's (\$38)  
 14 on July 23, 2015, because during the same election cycle, DDHC reported other disbursements  
 15 totaling \$194 to Rubio's.<sup>42</sup>

16 Therefore, we recommend that the Commission find reason to believe that DDHC  
 17 violated 52 U.S.C. § 30104(b)(6)(A) by failing to accurately report disbursements.

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<sup>40</sup> 52 U.S.C. § 30104(b)(6)(A); *see also* 11 C.F.R. § 104.3(b)(4).

<sup>41</sup> Further, there is information on the public record suggesting that the disbursements were not the result of fraudulent activity on the credit card. *See* Morgan Cook, *Rep. Hunter's Probe Covers Possible Fraud Involving Video Game Charges*, SAN DIEGO UNION-TRIBUNE, Aug. 9, 2017 (citing a search warrant for the offices of the DDHC's treasurer which describes an alleged "scheme to defraud First National Bank by making false statements related to video game charges which resulted in the refunding or crediting of charges not properly due").

<sup>42</sup> DDHC Amended 2015 July Quarterly Rpt. at 5 (Apr. 15, 2016) (Misc. Text); DDHC Miscellaneous Text Form to the FEC) (Nov. 16, 2016).

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1 **IV. PROPOSED INVESTIGATION**

2 The factual record is incomplete. Respondents have not provided any information  
3 explaining the circumstances surrounding the admitted personal disbursements. Moreover, the  
4 available information raises questions that Respondents' conduct may have been knowing and  
5 willful. Furthermore, there are additional disbursements, totaling \$32,000 or more, that may  
6 have been personal use.

7 Therefore, we will request information from Respondents and relevant third parties. We  
8 will attempt to conduct our investigation through voluntary means, but we recommend that the  
9 Commission authorize the use of compulsory process.

10

11 **V. RECOMMENDATIONS**

12 1. Find reason to believe that Duncan D. Hunter for Congress and Chris Marston in  
13 his official capacity as treasurer, Rep. Duncan D. Hunter, and Margaret Hunter  
14 violated 52 U.S.C. § 30114(b);

15 2. Find reason to believe that Duncan D. Hunter for Congress and Chris Marston in  
16 his official capacity as treasurer violated 52 U.S.C. § 30104(b)(6)(A);

17 3. Approve the attached Factual and Legal Analyses;

18 4. Authorize the use of compulsory process; and

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1                   5.       Approve the appropriate letters.

2  
3 Lisa J. Stevenson  
4 Acting General Counsel  
5  
6  
7 BY: *Kathleen M. Guith*  
8 Kathleen Guith  
9 Associate General Counsel for Enforcement  
Date 10/6/17

10  
11  
12  
13 Jin Lee  
14 Acting Assistant General Counsel  
15  
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19

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*Jin Lee*  
Jin Lee  
Acting Assistant General Counsel

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*Claudio Pavia*  
Claudio J. Pavia  
Attorney

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## Attachments:

1. Table of Disbursements Reported as “Personal” or “Mistaken”
2. Table of Disbursements That May Have Been Personal Use
3. Factual and Legal Analysis for Rep. Hunter
4. Factual and Legal Analysis for Margaret Hunter
5. Factual and Legal Analysis for Duncan D. Hunter for Congress

1 APPENDIX TO THE FIRST GENERAL COUNSEL'S REPORT  
2  
3  
45 **MUR 7228 Complainants:** Adena Boxer-Capitano  
6 Amy Huie  
7 Amy Riviere  
8 Andre Faubert  
9 Brina Bujkovsky  
10 Bruce Glassman  
11 Candace M. Smiley  
12 Catherine Valentine  
13 Christina Harris  
14 Connie J. Elder  
15 Elizabeth A. Judy  
16 Emma Glassman-Hughes  
17 Gayle Irene Reed  
18 Gus Bujkovsky  
19 Janice Bailey  
20 Janice Reich  
21 Jennifer Chambers  
22 Joan Bennett  
23 Karen Petty  
24 Kathleen L. Diehlmann  
25 Kathleen Steel  
26 Kenneth Carney  
27 Laura P. Gordon  
28 Lenore Wilkas  
29 Linda Dunne Garro  
30 Lisa M. Nowrick  
31 Lorilyn Vouros  
32 Lucinda Stephens  
33 Lynda Vernia  
34 Lynn Foltz  
35 Marcelle Stokes Caratti  
36 Marely Ramirez  
37 Maura Maloof  
38 Maureen Gupta  
39 Michael Martin  
40 N. Teal Turner-Young  
41 Nancy Sheila Roy  
42 Naomi Lowe  
43 Pamela A. Albergo  
44 Pamela Stricker  
45 Rebecca Collins  
46 Rosalee Clanton

MURs 7058/7228/7233 (Duncan D. Hunter for Congress, *et al.*)

Appendix to the First General Counsel's Report

Page 2 of 2

1	Rosalyn Morales
2	Sara J. Thelin
3	Sheila Botkin
4	Sheryl Brown
5	Sonia Jane Peterson
6	Stacey A. Riordan
7	Susan Liebes
8	Suzette Nguyen
9	Teresa Nyles
10	Toni Flecker
11	Tracy Hughes

### Table of Disbursements Reported as “Personal” or “Mistaken”

Category	Date	Payee	Amount	Purpose of Disbursement		Reimbursement
1. Hawaii Trip	3/31/15	Expedia	\$598	Initial Reporting	2015 Apr. Q Rpt. (Apr. 15, 2015) "Mistaken Charge - To Be Reimbursed"	Reimbursed by Rep. Hunter on April 8, 2016 374 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
				Second Reporting	Amended 2015 Apr. Q Rpt. (Apr. 15, 2015) (same)	
1. Hawaii Trip	3/31/15	Expedia	\$530	Initial Reporting	2015 Apr. Q Rpt. (Apr. 15, 2015) "Mistaken Charge - To Be Reimbursed"	Reimbursed by Rep. Hunter on April 8, 2016 374 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
				Second Reporting	Amended 2015 Apr. Q Rpt. (Apr. 15, 2015) (same)	
1. Hawaii Trip	4/9/15	Aston Kaanapali Shores	\$9	Initial Reporting	2015 July Q Rpt. (July 15, 2015) "Mistaken Charge - Reimbursed 6/30"	Reimbursed by Rep. Hunter on June 30, 2015 82 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)
				Second Reporting	Amended 2015 July Q Rpt. (Apr. 15, 2016) "Mistaken Charge - Reimbursed 6/30/15"	
1. Hawaii Trip	4/9/15	Aston Kaanapali Shores	\$3,093	Initial Reporting	2015 July Q Rpt. (July 15, 2015) "Mistaken Charge - Reimbursed 6/30"	Reimbursed by Rep. Hunter on June 30, 2015 82 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)
				Second Reporting	Amended 2015 July Q Rpt. (Apr. 15, 2016) "Mistaken Charge - Reimbursed 6/30/15"	
1. Hawaii Trip	4/9/15	Aston Kaanapali Shores	\$2,059	Initial Reporting	2015 July Q Rpt. (July 15, 2015) "Mistaken Charge - Reimbursed 6/30"	Reimbursed by Rep. Hunter on June 30, 2015 82 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)
				Second Reporting	Amended 2015 July Q Rpt. (Apr. 15, 2016) "Mistaken Charge - Reimbursed 6/30/15"	
<b>CATEGORY TOTAL = \$6,289</b>						
2. Online Video Games	4/28/15	Steam Games	\$19	Initial Reporting	Unitemized Amended 2015 July Q Rpt. (Apr. 15, 2016) (Misc. Text) Identified as "Mistaken Charge"	Reimbursed by Rep. Hunter on June 30, 2015 63 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)

<b>2. Online Video Games</b>	<b>5/13/15</b>	<b>Origin.com</b>	<b>\$19</b>	Initial Reporting	Unitemized Amended 2015 July Q Rpt. (Apr. 15, 2016) (Misc. Text) Identified as "Mistaken Charge"	Reimbursed by Rep. Hunter on June 30, 2015 48 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)
<b>2. Online Video Games</b>	<b>5/29/15</b>	<b>Blizzard</b>	<b>\$19</b>	Initial Reporting	Unitemized Amended 2015 July Q Rpt. (Apr. 15, 2016) (Misc. Text) Identified as "Mistaken Charge"	Reimbursed by Rep. Hunter on June 30, 2015 32 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)
<b>2. Online Video Games</b>	<b>6/22/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Mistaken Purchase - To Be Reimbursed"	Reimbursed by Rep. Hunter on June 30, 2015 8 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 6/30/15"	
<b>2. Online Video Games</b>	<b>6/23/15</b>	<b>Blizzard</b>	<b>\$19</b>	Initial Reporting	Unitemized Amended 2015 July Q Rpt. (Apr. 15, 2016) (Misc. Text) Identified as "Mistaken Charge"	Reimbursed by Rep. Hunter on June 30, 2015 7 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)
<b>2. Online Video Games</b>	<b>6/23/15</b>	<b>Steam Games</b>	<b>\$10</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Mistaken Purchase - To Be Reimbursed"	Reimbursed by Margaret Hunter on October 21, 2015 120 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016)(same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Refunded 4/8/2016"	
<b>2. Online Video Games</b>	<b>6/24/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Mistaken Purchase - To Be Reimbursed"	Reimbursed by Margaret Hunter on October 21, 2015 119 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 4/8/2016"	

2. Online Video Games	6/29/15	Steam Games	\$5	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Mistaken Purchase - To Be Reimbursed"	Reimbursed by Rep. Hunter on June 30, 2015 1 days outstanding Amended 2015 July Q Rpt. at 5, 66 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 6/30/15"	
2. Online Video Games	6/30/15	Steam Games	\$5	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Mistaken Purchase - To Be Reimbursed"	Reimbursed by Margaret Hunter on October 21, 2015 113 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 4/8/2016"	
2. Online Video Games	7/1/15	Steam Games	\$5	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Personal Expense - To Be Paid Back"	Reimbursed by Margaret Hunter on October 21, 2015 112 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 10/21/15"	
2. Online Video Games	7/2/15	Steam Games	\$5	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Personal Expense - To Be Paid Back"	Reimbursed by Margaret Hunter on October 21, 2015 111 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 10/21/15"	
2. Online Video Games	7/10/15	Steam Games	\$10	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Personal Expense - To Be Paid Back"	Reimbursed by Margaret Hunter on October 21, 2015 103 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 10/21/15"	

<b>2. Online Video Games</b>	<b>7/14/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Personal Expense - To Be Paid Back"	Reimbursed by Margaret Hunter on October 21, 2015 99 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 10/21/15"	
<b>2. Online Video Games</b>	<b>7/14/15</b>	<b>Steam Games</b>	<b>\$27</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Personal Expense - To Be Paid Back"	Reimbursed by Margaret Hunter on October 21, 2015 99 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 10/21/15"	
<b>2. Online Video Games</b>	<b>7/15/15</b>	<b>Steam Games</b>	<b>\$20</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Personal Expense - To Be Paid Back"	Reimbursed by Margaret Hunter on October 21, 2015 98 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Reimbursed 10/21/15"	
<b>2. Online Video Games</b>	<b>7/23/15</b>	<b>Blizzard</b>	<b>\$19</b>	Initial Reporting	Unitemized Amended 2015 YE Rpt. (Apr. 15, 2016) (Misc. Text) Identified as "Mistaken Charge"	Reimbursed by Margaret Hunter on October 21, 2015 90 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
<b>2. Online Video Games</b>	<b>8/24/15</b>	<b>Blizzard</b>	<b>\$19</b>	Initial Reporting	Unitemized Amended 2015 YE Rpt. (Apr. 15, 2016) (Misc. Text) Identified as "Mistaken Charge"	Reimbursed by Margaret Hunter on October 21, 2015 58 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)
<b>2. Online Video Games</b>	<b>9/23/15</b>	<b>Blizzard</b>	<b>\$19</b>	Initial Reporting	Unitemized Amended 2015 YE Rpt. (Apr. 15, 2016) (Misc. Text) Identified as "Mistaken Charge"	Reimbursed by Margaret Hunter on October 21, 2015 28 days outstanding Amended 2015 Year-End Rpt. at 5, 29 (Apr. 15, 2016)

<b>2. Online Video Games</b>	<b>10/13/15</b>	<b>Steam Games</b>	<b>\$20</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/13/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016)"Fraudulent Charge - Refund Requested"	
<b>2. Online Video Games</b>	<b>10/13/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refund Requested"	
<b>2. Online Video Games</b>	<b>10/14/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/19/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>10/19/15</b>	<b>Steam Games</b>	<b>\$7</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/19/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/19/15</b>	<b>Steam Games</b>	<b>\$48</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/19/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016)"Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/20/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>10/20/15</b>	<b>Steam Games</b>	<b>\$10</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/20/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/20/15</b>	<b>Steam Games</b>	<b>\$10</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/21/15</b>	<b>Steam Games</b>	<b>\$15</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/21/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016)(same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/22/15</b>	<b>Steam Games</b>	<b>\$31</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>10/23/15</b>	<b>Steam Games</b>	<b>\$40</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>10/26/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/6/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/6/15</b>	<b>Steam Games</b>	<b>\$50</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/9/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/9/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>11/10/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/10/15</b>	<b>Steam Games</b>	<b>\$10</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/10/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/10/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/10/15</b>	<b>Steam Games</b>	<b>\$6</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/10/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>11/10/15</b>	<b>Steam Games</b>	<b>\$20</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/10/15</b>	<b>Steam Games</b>	<b>\$21</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/12/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/13/15</b>	<b>Steam Games</b>	<b>\$12</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/13/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/16/15</b>	<b>Steam Games</b>	<b>\$14</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016)(same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>11/16/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/16/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/17/15</b>	<b>Steam Games</b>	<b>\$9</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/17/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/17/15</b>	<b>Steam Games</b>	<b>\$50</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>11/17/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/17/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/17/15</b>	<b>Steam Games</b>	<b>\$50</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/17/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/18/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>11/20/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/20/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/20/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016)"Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/20/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/20/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>11/23/15</b>	<b>Steam Games</b>	<b>\$44</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/24/15</b>	<b>Steam Games</b>	<b>\$23</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>11/24/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/4/15</b>	<b>Steam Games</b>	<b>\$9</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016)(same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/4/15</b>	<b>Steam Games</b>	<b>\$56</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/4/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>12/7/15</b>	<b>Steam Games</b>	<b>\$77</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/7/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/8/15</b>	<b>Steam Games</b>	<b>\$96</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/11/15</b>	<b>Steam Games</b>	<b>\$49</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/14/15</b>	<b>Steam Games</b>	<b>\$10</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/14/15</b>	<b>Steam Games</b>	<b>\$8</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>12/14/15</b>	<b>Steam Games</b>	<b>\$25</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/16/15</b>	<b>Steam Games</b>	<b>\$10</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/16/15</b>	<b>Steam Games</b>	<b>\$10</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/16/15</b>	<b>Steam Games</b>	<b>\$23</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>2. Online Video Games</b>	<b>12/16/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016)"Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	

<b>2. Online Video Games</b>	<b>12/16/15</b>	<b>Steam Games</b>	<b>\$5</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	<b>OUTSTANDING</b>
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Fraudulent Charge - Refunded 4/5/16"	
<b>CATEGORY TOTAL = \$1,556</b>						
<b>3. Oral Surgery Clinic</b>	<b>6/11/15</b>	<b>Center for Oral &amp; Facial Surgery</b>	<b>\$1,137</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Mistaken Purchase - To Be Reimbursed"	Reimbursed by Rep. Hunter on April 8, 2016 302 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Charge - Part Refunded 7/14/15; Part Reimbursed 4/8/16"	
<b>3. Oral Surgery Clinic</b>	<b>7/14/15</b>	<b>Center for Oral &amp; Facial Surgery</b>	<b>(\$326)</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Refund of Payment"	n/a
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) (same)	
<b>CATEGORY TOTAL = \$1,137</b>						
<b>4. Private School</b>	<b>8/14/15</b>	<b>Christian Unified Schools</b>	<b>\$3,500</b>	Initial Reporting	2015 Oct. Q Rpt. (Oct. 15, 2015) "Annual Fundraising Donation"	Reimbursed by Rep. Hunter on April 5, 2016 235 days outstanding 2016 Pre-Primary Rpt. at 27 (May 26, 2016)
				Second Reporting	Amended 2015 Oct. Q Rpt. (Jan. 11, 2016) (same)	
				Third Reporting	Amended 2015 Oct. Q Rpt. (Apr. 16, 2016) "Mistaken Transaction - Refunded 4/5/2016"	

<b>4. Private School</b>	<b>9/21/15</b>	<b>Christian Unified Schools</b>	<b>\$1,650</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Personal Expense - To Be Paid Back"	Reimbursed by Rep. Hunter on April 5, 2016 197 days outstanding 2016 Pre-Primary Rpt. at 27 (May 26, 2016)
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016)"Mistaken Transaction - Refunded 4/5/2016"	
<b>4. Private School</b>	<b>11/9/15</b>	<b>Christian Unified Schools</b>	<b>\$1,000</b>	Initial Reporting	2015 YE Rpt. (Jan. 31, 2016) "Donation for Local Organization Fundraiser"	Reimbursed by Rep. Hunter on April 5, 2016 148 days outstanding 2016 Pre-Primary Rpt. at 27 (May 26, 2016)
				Second Reporting	Amended 2015 YE Rpt. (Apr. 15, 2016) (same)	
				Third Reporting	Amended 2015 YE Rpt. (June 20, 2016) "Mistaken Transaction - Refunded 4/5/2016"	
<b>CATEGORY TOTAL = \$6,150</b>						
<b>5. Payments to Mrs. Hunter</b>	<b>1/25/16</b>	<b>Margaret Hunter</b>	<b>\$100</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 74 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>1/29/16</b>	<b>Margaret Hunter</b>	<b>\$80</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 70 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>2/16/16</b>	<b>Margaret Hunter</b>	<b>\$500</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 52 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>2/22/16</b>	<b>Margaret Hunter</b>	<b>\$300</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 46 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>2/24/16</b>	<b>Margaret Hunter</b>	<b>\$100</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 44 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)

<b>5. Payments to Mrs. Hunter</b>	<b>2/25/16</b>	<b>Margaret Hunter</b>	<b>\$40</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 43 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>2/29/16</b>	<b>Margaret Hunter</b>	<b>\$303</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 39 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>3/14/16</b>	<b>Margaret Hunter</b>	<b>\$100</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 25 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>3/14/16</b>	<b>Margaret Hunter</b>	<b>\$200</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 25 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>3/25/16</b>	<b>Margaret Hunter</b>	<b>\$200</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 14 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>5. Payments to Mrs. Hunter</b>	<b>3/29/16</b>	<b>Margaret Hunter</b>	<b>\$100</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Transaction - Refunded 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 10 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>CATEGORY TOTAL = \$2,023</b>						
<b>6. Garage Door Repair</b>	<b>3/8/16</b>	<b>Easy Open Door Company, Inc.</b>	<b>\$1,200</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016)"Mistaken Charge - Reimbursed 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 31 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>CATEGORY TOTAL = \$1,200</b>						
<b>7. Retail Stores</b>	<b>2/22/16</b>	<b>Nordstrom</b>	<b>\$62</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Charge - Reimbursed 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 46 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>7. Retail Stores</b>	<b>2/29/16</b>	<b>Barnes &amp; Noble</b>	<b>\$79</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Charge - Reimbursed 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 39 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>7. Retail Stores</b>	<b>3/1/16</b>	<b>Barnes &amp; Noble</b>	<b>\$45</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Charge - Reimbursed 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 38 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>7. Retail Stores</b>	<b>3/7/16</b>	<b>Emerald City Gang, Inc.</b>	<b>\$361</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Charge - Reimbursed 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 32 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)

<b>7. Retail Stores</b>	<b>3/28/16</b>	<b>Barnes &amp; Noble</b>	<b>\$37</b>	Initial Reporting	2016 Apr. Q Rpt. (Apr. 15, 2016) "Mistaken Charge - Reimbursed 4/8/2016"	Reimbursed by Rep. Hunter on April 8, 2016 11 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>CATEGORY TOTAL = \$583</b>						
<b>8. Theme Park</b>	<b>3/2/16</b>	<b>Legoland</b>	<b>\$0.50</b>	Initial Reporting	<i>Unitemized</i> 2016 Pre-Primary Rpt. (May 26, 2016) (Misc. Text) Identified as "Mistaken Charge"	Reimbursed by Rep. Hunter on April 8, 2016 37 days outstanding 2016 Pre-Primary Rpt. at 5, 27 (May 26, 2016)
<b>CATEGORY TOTAL = \$0.50</b>						

### Table of Disbursements That May Have Been Personal Use

Category	Sub-Category	Date	Amount	Report	Recipient	Description	Explanation
Food	Restaurant	3/25/2016	\$35.70	2016 Q1	Rubio's	Food / Beverages	Admitted personal disbursement made to same payee (a fast food restaurant)
Food	Restaurant	2/29/2016	\$38.75	2016 Q1	Rubio's	Food/Beverages	Admitted personal disbursement made to same payee (a fast food restaurant)
Travel	Arizona Trip	2/16/2016	\$8.00	2016 Q1	Southwest Airlines	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Arizona Trip	2/16/2016	\$22.78	2016 Q1	ADY UBER Technologies	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Arizona Trip	2/16/2016	\$30.10	2016 Q1	ADY UBER Technologies	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Arizona Trip	2/16/2016	\$466.48	2016 Q1	Southwest Airlines	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Arizona Trip	2/12/2016	\$299.00	2016 Q1	United Airlines	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Arizona Trip	2/12/2016	\$911.20	2016 Q1	United Airlines	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Arizona Trip	2/12/2016	\$1,170.59	2016 Q1	United Airlines	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Food	Restaurant	1/25/2016	\$19.50	2016 Q1	Rubio's	Food/Beverages	Admitted personal disbursement made to same payee (a fast food restaurant)
Travel	Arizona Trip	1/22/2016	\$5.00	2016 Q1	Southwest Airlines	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Arizona Trip	1/21/2016	\$618.60	2016 Q1	United Airlines	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Arizona Trip	1/19/2016	\$53.97	2016 Q1	Marriott Hotels	Food/Beverages	Travel-related payments made in close proximity to the Arizona Trip.

Travel	Arizona Trip	1/19/2016	\$246.98	2016 Q1	Southwest Airlines	Travel	Travel-related payments made in close proximity to the Arizona Trip.
Travel	Italy Trip	12/1/2015	\$0.33	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	12/1/2015	\$2.09	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$0.38	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$0.71	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$0.89	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$1.05	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$1.15	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$3.67	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$4.80	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$5.07	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$5.40	2015 YE	ADY UBER Technologies	Travel	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$6.50	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$8.68	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$23.94	2016 Q1	Hotel San Gallo Palace	Food/Beverages	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$122.35	2016 Q1	Hotel San Gallo Palace	Food/Beverages	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/30/2015	\$169.16	2016 Q1	Hotel San Gallo Palace	Travel	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/27/2015	\$4.14	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/27/2015	\$4.84	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.

Travel	Italy Trip	11/27/2015	\$7.44	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/27/2015	\$8.83	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/27/2015	\$20.49	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/27/2015	\$264.20	2015 YE	Hyatt	Food/Beverage	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/25/2015	\$0.83	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/25/2015	\$6.40	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/24/2015	\$0.76	2016 Q1	First Bankcard	Bank Fee	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/24/2015	\$783.28	2015 YE	Hyatt	Catering & Venue	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/24/2015	\$964.42	2015 YE	Hyatt	Catering & Venue	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/23/2015	\$16.99	2015 YE	United Airlines	Travel	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/23/2015	\$17.44	2015 YE	ADY UBER Technologies	Travel	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/23/2015	\$25.25	2015 YE	ADY UBER Technologies	Travel	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/23/2015	\$25.25	2015 YE	ADY UBER Technologies	Travel	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/23/2015	\$25.25	2015 YE	ADY UBER Technologies	Travel	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/23/2015	\$47.03	2015 YE	ADY UBER Technologies	Travel	Travel-related payments concurrent with the Italy trip.
Travel	Italy Trip	11/23/2015	\$389.11	2016 Q1	Hertz Rental Car	Travel	Travel-related payments concurrent with the Italy trip.
Food	Restaurant	11/19/2015	\$40.44	2015 YE	Rubio's	Food/Beverages	Admitted personal disbursement made to same payee (a fast food restaurant)
Food	Restaurant	10/5/2015	\$38.06	2015 YE	Rubio's	Food/Beverages	Admitted personal disbursement made to same payee (a fast food restaurant)

Food	Restaurant	9/24/2015	\$20.91	2015 YE	Rubio's	Food/Beverages	Admitted personal disbursement made to same payee (a fast food restaurant)
Food	Grocery Store	9/10/2015	\$29.55	2015 YE	Haggen Inc.	Food/Beverages	Payments to three other grocery stores were all admitted as personal.
Vehicle Expenses	Oil Change	8/26/2015	\$95.47	2015 YE	Jiffy Lube	Car Maintenance	All gas purchases during same period were admitted to be personal.
Food	Grocery Store	8/21/2015	\$23.95	2015 YE	Haggen Inc.	Food/Beverages	Payments to three other grocery stores were all admitted as personal.
Food	Grocery Store	8/21/2015	\$146.68	2015 YE	Haggen Inc.	Food/Beverages	Payments to three other grocery stores were all admitted as personal.
Food	Grocery Store	8/20/2015	\$63.20	2015 YE	Haggen Inc.	Food/Beverages	Payments to three other grocery stores were all admitted as personal.
Food	Grocery Store	6/16/2015	\$284.37	2015 Q3	Haggen Inc.	Food & Beverages	Payments to three other grocery stores were all admitted as personal.
Food	Grocery Store	5/22/2015	\$288.95	2015 Q2	Haggen Inc.	Food & Beverages	Payments to three other grocery stores were all admitted as personal.
Food	Grocery Store	5/19/2015	\$124.42	2015 Q2	Haggen Inc.	Food & Beverages	Payments to three other grocery stores were all admitted as personal.
Food	Grocery Store	4/30/2015	\$67.14	2015 Q2	Haggen Inc.	Food & Beverages	Payments to three other grocery stores were all admitted as personal.
Food	Grocery Store	4/13/2015	\$297.46	2015 Q2	Haggen Inc.	Food & Beverages	Payments to three other grocery stores were all admitted as personal.
Travel	Hawaii Trip	4/13/2015	\$5.60	2015 Q2	United Airlines	Airline Fees	Travel-related payments made during same time period as Hawaii trip.
Travel	Hawaii Trip	4/13/2015	\$46.00	2015 Q2	United Airlines	Transportation	Travel-related payments made during same time period as Hawaii trip.
Travel	Hawaii Trip	4/13/2015	\$58.00	2015 Q2	United Airlines	Transportation	Travel-related payments made during same time period as Hawaii trip.
Travel	Hawaii Trip	4/13/2015	\$645.20	2015 Q2	United Airlines	Transportation	Travel-related payments made during same time period as Hawaii trip.

Travel	Hawaii Trip	4/13/2015	\$727.20	2015 Q2	United Airlines	Transportation	Travel-related payments made during same time period as Hawaii trip.
Travel	Hawaii Trip	3/25/2015	\$11.97	2015 Q1	United Airlines	Transportation Fee	Travel-related payments made during same time period as Hawaii trip.
Travel	Hawaii Trip	3/25/2015	\$265.10	2015 Q1	United Airlines	Transportation	Travel-related payments made during same time period as Hawaii trip.
Travel	Unknown Destination 4	2/26/2015	\$15.96	2015 Q1	United Airlines	Transportation Fee	Admitted personal payments to United Airlines made the same day.
Travel	Unknown Destination 4	2/24/2015	\$127.10	2015 Q1	United Airlines	Transportation	Admitted personal payments to United Airlines made the same day.
Travel	Unknown Destination 4	2/24/2015	\$358.60	2015 Q1	United Airlines	Transportation	Admitted personal payments to United Airlines made the same day.
Travel	Unknown Destination 4	2/23/2015	\$601.20	2015 Q1	United Airlines	Transportation	Admitted personal payments to United Airlines made the same day.
Travel	Unknown Destination 3	1/30/2015	\$8.78	2015 Q1	ADY UBER Technologies	Transportation	Travel-related payment made the same day as admitted personal United Airlines payment.
Food	Grocery Store	12/16/2014	\$12.94	2014 YE	Vons	Food & Beverages	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	12/16/2014	\$398.25	2014 YE	Vons	Food & Beverages	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	11/24/2014	\$215.40	2014 30G	Albertsons	Food & Beverages	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Travel	Unknown Destination 2	11/12/2014	\$546.20	2014 30G	United Airlines	Transportation	Admitted personal payments to United Airlines made the same day.
Travel	Unknown Destination 2	11/12/2014	\$546.20	2014 30G	United Airlines	Transportation	Admitted personal payments to United Airlines made the same day.
Travel	Unknown Destination 2	11/12/2014	\$546.20	2014 30G	United Airlines	Transportation	Admitted personal payments to United Airlines made the same day.
Travel	Unknown Destination 2	11/12/2014	\$546.20	2014 30G	United Airlines	Transportation	Admitted personal payments to United Airlines made the same day.

Vehicle Expenses	Gasoline	9/29/2014	\$79.18	2014 Q3	Shell Oil Co	Gas	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Travel	Unknown Destination 1	7/15/2014	\$2,035.59	2014 Q3	NWL Lodging	Lodging	Travel-related payment made a few days after admitted personal payment to United Airlines on July 11, 2014. NB: the payee is apparently the Nemacolin Woodlands Resort.
Travel	Unknown Destination 1	7/14/2014	\$1,530.52	2014 Q3	Hyatt	Accommodation s	Travel-related payment made a few days after admitted personal payment to United Airlines on July 11, 2014.
Travel	Unknown Destination 1	7/11/2014	\$39.00	2014 Q3	United Airlines	Airline Fee	Admitted personal payment to United Airlines made the same day.
Travel	Unknown Destination 1	7/11/2014	\$39.00	2014 Q3	United Airlines	Airline Fee	Admitted personal payment to United Airlines made the same day.
Travel	Unknown Destination 1	7/11/2014	\$7.15	2014 Q3	ADY UBER Technologies	Transportation Services	Travel-related payment made the same day as admitted personal United Airlines payment.
Retail Store Purchases	Big Box	3/3/2014	\$73.38	2014 Q1	Walmart	Office Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	2/28/2013	\$59.04	2013 Q1	Vons	Decorations	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	1/28/2013	\$30.28	2013 Q1	Vons	See Memo - Floral Arrangement	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	1/28/2013	\$44.20	2013 Q1	Walmart	See Memo - Wrapping Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	1/28/2013	\$194.16	2013 Q1	Walmart	See Memo - Gift Basket Items For Family Programs	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	1/28/2013	\$205.00	2013 Q1	Vons	See Memo - Items For Adopted Family Program	All disbursements to this payee during 2016 election cycle were admitted to be personal.

Retail Store Purchases	Big Box	1/28/2013	\$233.34	2013 Q1	Walmart	See Memo - Camp Pendleton Gift Baskets	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Book Store	1/28/2013	\$256.81	2013 Q1	Barnes and Noble	See Memo - Camp Pendleton Gift Baskets	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Book Store	1/28/2013	\$359.57	2013 Q1	Barnes and Noble	See Memo - Basket For Children's Drives	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	1/2/2013	\$110.61	2013 Q1	Costco	See Memo - Christmas Gift Baskets	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	1/2/2013	\$219.13	2013 Q1	Walmart	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Home Improvement	1/2/2013	\$240.82	2013 Q1	Home Depot	See Memo - Floral And Christmas Decor	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Home Improvement	1/2/2013	\$389.42	2013 Q1	Home Depot	See Memo - Floral And Christmas Decor	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	12/3/2012	\$150.00	2012 YE	Costco	See Memo - Membership Dues	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	12/3/2012	\$177.43	2012 YE	Costco	See Memo - Campaign Reception	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Sporting Goods	12/3/2012	\$282.58	2012 YE	Dick's Clothing & Sporting Store	See Memo - Gift Basket Items	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Book Store	11/1/2012	\$77.84	2012 30G	Barnes and Noble	See Memo - Gift Basket Items	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	11/1/2012	\$221.34	2012 30G	Walmart	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	11/1/2012	\$447.70	2012 30G	Costco	See Memo - Food For Supporter Dinner	All disbursements to this payee during 2016 election cycle were admitted to be personal.

Food	Grocery Store	10/2/2012	\$92.13	2012 12G	Vons	See Memo - Meals For Workers	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	9/4/2012	\$56.69	2012 Q3	Vons	See Memo - Meals For Workers	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	9/4/2012	\$131.40	2012 Q3	Vons	See Memo - BBQ Social Event Expenses	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	9/4/2012	\$180.19	2012 Q3	Vons	See Memo - Event Flowers	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	9/4/2012	\$315.64	2012 Q3	Costco	See Memo - Picnic Event Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	9/4/2012	\$349.51	2012 Q3	Walmart	See Memo - Picnic Event Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	7/31/2012	\$175.68	2012 Q3	Vons	See Memo - Gift Basket Items	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	7/31/2012	\$184.50	2012 Q3	Vons	See Memo - Flowers	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Book Store	7/31/2012	\$206.84	2012 Q3	Barnes and Noble	See Memo - Gift Basket Items	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	7/9/2012	\$185.46	2012 Q3	Vons	See Memo - Food For Workers	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	7/9/2012	\$263.63	2012 Q3	Walmart	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	7/9/2012	\$278.34	2012 Q3	Costco	See Memo - Food For Workers	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	5/7/2012	\$455.48	2012 12P	Vons	Event Expense	All disbursements to this payee during 2016 election cycle were admitted to be personal.

Retail Store Purchases	Book Store	5/4/2012	\$110.36	2012 12P	Barnes and Noble	See Memo - Campaign Gift Baskets	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	5/4/2012	\$200.93	2012 12P	Walmart	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	5/4/2012	\$282.60	2012 12P	Costco	See Memo - Campaign Gift Baskets	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	4/2/2012	\$152.74	2012 12P	Costco	See Memo - Campaign Gift Baskets	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	4/2/2012	\$270.94	2012 12P	Walmart	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	1/30/2012	\$90.31	2012 Q1	Costco	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	1/30/2012	\$100.25	2012 Q1	Vons	See Memo - Holiday Gift Basket	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	1/30/2012	\$160.11	2012 Q1	Costco	See Memo - Holiday Gift Basket	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	1/30/2012	\$326.20	2012 Q1	Target	See Memo - Holiday Gift Basket	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	1/2/2012	\$226.35	2012 Q1	Vons	See Memo - Gift Baskets	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Book Store	1/2/2012	\$238.18	2012 Q1	Barnes and Noble	See Memo - Gift Baskets	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	8/29/2011	\$841.53	2011 Q3	Costco	See Memo - Campaign Computer	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	10/19/2010	\$299.88	2010 30G	Costco	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.

Retail Store Purchases	Big Box	8/10/2010	\$114.09	2010 Q3	Costco	See Memo - Event Expense	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	7/20/2010	\$135.64	2010 Q3	Target	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	7/20/2010	\$170.53	2010 Q3	Costco	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	6/18/2010	\$942.47	2010 Q2	Costco	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	6/18/2010	\$307.72	2010 Q2	Target	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	5/21/2010	\$394.34	2010 Q2	Costco	See Memo - Event Catering	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Food	Grocery Store	2/17/2010	\$243.80	2010 Q1	Vons	See Memo - Event Catering	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	11/20/2009	\$50.00	2009 YE	Costco	Membership Dues	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Big Box	1/20/2009	\$421.16	2009 Q1	Costco	See Memo - Event Catering	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Home Improvement	10/15/2008	\$350.48	2008 12G	Home Depot	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Home Improvement	9/9/2008	\$75.83	2008 Q3	Home Depot	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Home Improvement	9/9/2008	\$121.21	2008 Q3	Home Depot	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Home Improvement	5/30/2008	\$118.21	2008 Q2	Home Depot	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.

Retail Store Purchases	Home Improvement	5/5/2008	\$297.92	2008 12P	Home Depot	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Home Improvement	5/5/2008	\$232.31	2008 12P	Home Depot	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.
Retail Store Purchases	Home Improvement	4/22/2008	\$290.39	2008 12P	Home Depot	See Memo - Campaign Supplies	All disbursements to this payee during 2016 election cycle were admitted to be personal.

# FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

Respondent: Rep. Duncan D. Hunter MURs 7058, 7228, & 7233

## I. INTRODUCTION

9 These matters were generated by complaints filed with the Federal Election Commission  
10 by Citizens for Responsibility and Ethics in Washington and 54 individual complainants alleging  
11 that Rep. Duncan D. Hunter violated the Federal Election Campaign Act of 1971, as amended  
12 (the “Act”) by converting campaign funds to personal use. For the reasons stated below, the  
13 Commission finds reason to believe that Rep. Hunter violated 52 U.S.C. § 30114(b).

## 14 II. FACTUAL BACKGROUND

15 Rep. Duncan D. Hunter has been the congressman from California’s 50th congressional  
16 district since 2013, and previous to that he represented California’s 52nd congressional district  
17 since 2009. Duncan D. Hunter for Congress and Chris Marston in his official capacity as  
18 treasurer (the “Committee” or “DDHC”) is his principal campaign committee. Margaret Hunter,  
19 his wife, receives a salary from DDHC for “campaign consulting” and “campaign management  
20 services.”<sup>1</sup> Rep. Hunter has publicly stated that he and Margaret Hunter were the sole holders of  
21 the only two credit cards issued by DDHC during the relevant period.<sup>2</sup> Almost all of the alleged  
22 personal spending was apparently made using the two campaign credit cards.<sup>3</sup>

<sup>1</sup> See, e.g., DDHC 2017 Apr. Quarterly Rpt. at 53 (Apr. 15, 2017).

<sup>2</sup> Morgan Cook, *Hunter Repaid Funds Spent on Surf Shop, Garage Door*, SAN DIEGO UNION-TRIBUNE, Apr. 19, 2016 (cited by MUR 7058 Compl. at 3 (Apr. 29, 2016)); Olivia Nuzzi, *Trump's Guy, Rep. Duncan Hunter, Spent Campaign \$\$\$ at Disney*, DAILY BEAST, Apr. 10, 2016 (cited by MUR 7058 First Supp. Compl. at 1 (May 11, 2016)); Morgan Cook, *Did Hunter Campaign Pay for his Kids' School Lunches?*, SAN DIEGO UNION-TRIBUNE, June 15, 2016 (attached to MUR 7058 Second Supp. Compl. (July 21, 2016)).

<sup>3</sup> This is based on statements in the Responses and notations in the Committee's disclosure reports. See, e.g., MUR 7058 Second Supp. Resp. (Nov. 21, 2016), Attach. at 1 (DDHC Misc. Report to FEC) (Nov. 16, 2016).

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1        The improper spending can be divided into the following four categories, which are  
2    discussed in further detail in Sections II.A-D below: (1) 112 disbursements totaling at least  
3    \$18,939 reported on the Committee's original reports with the word "personal" or "mistaken";  
4    (2) several hundred disbursements totaling at least \$48,642 initially reported with campaign-  
5    related purposes, but later disclosed as personal in a Miscellaneous Report; (3) over 100  
6    additional disbursements totaling approximately \$32,000 reported with campaign-related  
7    purposes, but that may have been personal use based on the available information; and (4) salary  
8    payments (\$3,000 per-month) and reimbursements totaling \$15,619 from the Committee to  
9    Margaret Hunter that are alleged to have not been for *bona fide* campaign work.

10        **A.    Disbursements Reported on Original Disclosure Reports With the Word**  
11        **"Personal" or "Mistaken" Listed as the Purpose**

12        Between March 31, 2015 and March 29, 2016, DDHC made 112 disbursements totaling  
13    at least \$18,939 that, with few exceptions, were reported with the word "personal" or "mistaken"  
14    on the Purpose of Disbursement line on the original disclosure reports.<sup>4</sup> They were apparently  
15    related to the Hunters' personal lives. For instance, the disbursements included payments to the  
16    private school attended by their children, allegedly for tuition, and payments to fix the garage  
17    door of their residence.<sup>5</sup> In addition, a series of "mistaken" cash withdrawals were made directly  
18    to Margaret Hunter.

19        The Hunters reimbursed some disbursements while the spending was in progress, Rep.

20        Hunter reimbursed others after the Committee's spending issues were reported in the media, and

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<sup>4</sup>        E.g., "Personal Expense – To Be Paid Back" and "Mistaken Charge – To Be Reimbursed." A handful were unitemized but identified as "Mistaken Charges" on miscellaneous text forms attached to disclosure reports.

<sup>5</sup>        MUR 7058 Compl. at 4-5.

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1 additional disbursements have yet to be reimbursed.<sup>6</sup> The initial reimbursement payments were  
 2 made in June 2015 (Rep. Hunter) and October 2015 (Mrs. Hunter).<sup>7</sup> Afterwards, the Hunters  
 3 apparently continued to make “personal” and “mistaken” disbursements. However, on April 4,  
 4 2016, the Commission’s Reports Analysis Division (“RAD”) issued a Request for Additional  
 5 Information (“RFAI”)<sup>8</sup> regarding “personal” disbursements that resulted in widespread media  
 6 coverage.<sup>9</sup> Rep. Hunter almost immediately made reimbursements totaling \$11,896 — no  
 7 “personal” or “mistaken” disbursements have been reported since then.<sup>10</sup> Despite the Hunters’  
 8 aggregate \$17,311 reimbursement payments, it appears that at least \$1,302 in disbursements to  
 9 Legoland and Steam Games have not yet been reimbursed.<sup>11</sup>

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<sup>6</sup> After each of the reimbursements, DDHC amended the relevant reports to reflect that the disbursements had been repaid. *E.g.*, “Mistaken Transaction – Refunded 4/5/2016.”

<sup>7</sup> DDHC Amended 2015 July Quarterly Rpt. at 66 (Apr. 15, 2016) (reimbursement of \$5,245.71 from Rep. Hunter on June 20, 2015); DDHC Amended 2015 Year-End Rpt. at 29 (Apr. 15, 2016) (reimbursement of \$169.21 from Margaret Hunter on October 21, 2015).

<sup>8</sup> See Letter from Bradley Matheson, Sr. Campaign Finance & Reviewing Analyst, RAD to Chris Marston, Treasurer, DDHC (Apr. 4, 2016) (requesting additional information regarding one disbursement to Christian Unified Schools reported as “Personal Expense – To Be Paid Back” and 67 disbursements to Steam Games also reported as “Personal Expense – To Be Paid Back”).

<sup>9</sup> See *e.g.*, Brendan O’Connor, *The Vaping Congressman Spent \$1,302 of His Campaign Funds Last Year on Video Games*, GAWKER, Apr. 5, 2016.

<sup>10</sup> DDHC Pre-Primary Rpt. at 27 (May 26, 2016) (reimbursements of \$6,150 on April 5, 2016, and \$5,746 on April 8, 2016, from Rep. Hunter).

<sup>11</sup> The disbursement to Legoland was unitemized and DDHC has not disclosed the amount. Based on our calculations, Rep. Hunter repaid only \$0.50, but the true amount is likely to have been larger. The disbursements to Steam Games were amended to “Fraudulent Charge[s] – Refunded 4/5/16,” but DDHC has not reported the receipt of any refunds, and there is information suggesting the charges were not actually fraudulent. See Morgan Cook, *Rep. Hunter’s Probe Covers Possible Fraud Involving Video Game Charges*, SAN DIEGO UNION-TRIBUNE, Aug. 9, 2017 (citing a search warrant for the offices of the DDHC’s treasurer which describes an alleged “scheme to defraud First National Bank by making false statements related to video game charges which resulted in the refunding or crediting of charges not properly due”).

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**Figure 1. “Personal” and “Mistaken” Disbursements**

Category	Amount	Reimbursed	Outstanding Balance
Hawaii Trip	\$6,289	\$6,289	\$0
Online Video Games	\$1,556	\$254	\$1,302
Oral Surgery Clinic	\$1,137	\$1,137 <sup>12</sup>	\$0
Private School	\$6,150	\$6,150	\$0
Payments to Margaret Hunter	\$2,023	\$2,023	\$0
Garage Door Repair	\$1,200	\$1,200	\$0
Retail Stores	\$583	\$583	\$0
Theme Parks	<i>Unknown</i>	\$0.50	<i>Unknown</i>
<b>Total</b>	<b>\$18,939+</b>	<b>\$17,311</b>	<b>\$1,302+</b>

2 There is no information regarding what (or who) caused this spending or why it  
 3 continued for so long. Rep. Hunter, mostly through his spokesperson, has offered various  
 4 explanations to the news media suggesting it was a series of mix-ups, but information contained  
 5 in the MUR 7058 Complaint and public record suggests that some of those explanations may not  
 6 be accurate.<sup>13</sup>

7       **B. Disbursements Initially Reported With Campaign-Related Purposes but**  
 8       **Later Identified as “Personal Expenditures” on a Miscellaneous Report**

9       After the April 4, 2016 RFAI was issued and the MUR 7058 Complaint was filed, DDHC  
 10 completed an “independent financial review” of its 2016 election cycle activity and filed a  
 11 November 16, 2016 Miscellaneous Report listing numerous additional “personal expenditures.”  
 12 Respondent also filed a supplement in MUR 7058, attaching the Miscellaneous Report.<sup>14</sup> The

<sup>12</sup> Includes a \$326 refund from the Center for Oral & Facial Surgery.

<sup>13</sup> See MUR 7058 Compl. at 4-5.

<sup>14</sup> MUR 7058 Second Supp. Resp., Attach. (DDHC Misc. Report to the FEC) (Nov. 16, 2016). The report also states that, “out of an abundance of caution, the campaign has deemed any expense without adequate support as necessary for reimbursement.” *Id.* at 1. Because lack of documentation has no bearing on whether a disbursement was made irrespective of a campaign, the Commission considers any such item to be a personal disbursement, especially given that the subject line is “Duncan D. Hunter repayment of personal expenditures.” *Id.*

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1      Miscellaneous Report does not identify who or what caused the spending, but makes vague  
 2      assertions that the disbursements were “unauthorized” or “inadvertently charged.”<sup>15</sup> As  
 3      discussed further below, each of the disbursements was initially reported with an apparent  
 4      campaign-related purpose. Despite admitting that the disbursements were personal, DDHC has  
 5      not amended the relevant disclosure reports.

6              Rep. Hunter repaid \$48,651 to the Committee,<sup>16</sup> which is *slightly more* than the total of  
 7      the amounts listed on the Miscellaneous Report (\$48,642). However, the Commission calculates  
 8      that the “personal expenditures” add to \$51,788 (and include 348 individual disbursements)  
 9      based on the actual amounts disclosed in the Committee’s reports.

10              ***Figure 2. “Personal Expenditures” on Nov. 16, 2016 Miscellaneous Report***

Category	Amount Listed on Misc. Report	Amount on DDHC Disclosure Reports	Difference
Travel	\$14,913	\$14,913	\$0
Utilities	\$2,743	\$4,473	\$1,730
Food	\$7,089	\$7,029	(\$60)
Retail Stores	\$14,628	\$16,182	\$1,554
Gasoline	\$6,036	\$5,957	(\$78)
Theme Parks	\$1,249	\$1,249	\$0
Miscellaneous	\$1,984	\$1,984	\$0
<b>Total</b>	<b>\$48,642</b>	<b>\$51,788</b>	<b>\$3,145</b>

11              There are multiple examples of personal disbursements that, based on the available  
 12      information, were clearly related to the Hunters’ personal lives. First, there were payments to  
 13      Ki’s Restaurant, which delivered school lunches to Christian Unified Schools, attended by the

<sup>15</sup> *Id.*

<sup>16</sup> DDHC 2016 Post-General Election Rpt. at 18 (Dec. 8, 2016).

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1     Hunters' children.<sup>17</sup> The disbursements were made during the school year, and the restaurant's  
 2     website allows parents to add value to their children's account using a credit card.<sup>18</sup> Second,  
 3     there was a purchase at Educational Outfitters, which supplied uniforms for Christian Unified  
 4     Schools.<sup>19</sup> Third, there were payments to FEIS Productions, the children's traditional Irish dance  
 5     competition at which the Hunters' daughter competed.<sup>20</sup> Fourth, there were payments in Italy at  
 6     the same time as when Rep. Hunter posted a photograph on his personal social media account of  
 7     him and his wife enjoying what appears to be the Amalfi coastline.<sup>21</sup> The disbursements  
 8     occurred in multiple Italian cities and coincided with Thanksgiving. One disbursement was to a  
 9     Florentine jewelry store disclosed with "Food/Beverages" as the purpose.<sup>22</sup>

10        Fifth, there were disbursements in Boise, Idaho for travel, accommodations, and  
 11     recreation at the same time as when Rep. Hunter posted photographs to his personal social media  
 12     account of his family floating down and fishing the Boise River.<sup>23</sup> There were also payments at  
 13     rest areas in California and Nevada, along the route from Southern California, suggesting that the  
 14     Hunters were on a road trip. Sixth, there were payments at a Disneyland gift shop and restaurant  
 15     at the same time as when Rep. Hunter posted a photograph to his personal social media account

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<sup>17</sup>     MUR 7058 Second Supp. Compl. at 2-3.

<sup>18</sup>     *Id.* at 3.

<sup>19</sup>     MUR 7058 Compl. at 6.

<sup>20</sup>     *Results: - Feis Productions*, <http://www.feisinfo.com/results/schooldetails.php?feisid=78&school=Rose-Ritchie+Academy+of+Irish+Dance> (Results of Hidden Valley Feis 2015).

<sup>21</sup>     MUR 7058 Compl. at 5-6.

<sup>22</sup>     *Id.* at 5.

<sup>23</sup>     *Duncan Duane on Instagram: Boise River Float*, <https://www.instagram.com/p/42vMAsk6kS> (uploaded July 7, 2015). Included among the Boise-related disbursements is a payment to Epleys Boise River Rental.

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1 of his family riding Space Mountain.<sup>24</sup> Seventh, there were disbursements for water, electricity,  
 2 and Internet at the same time as when Rep. Hunter was apparently using his personal residence  
 3 as campaign headquarters.<sup>25</sup>

4 These disbursements were reported with descriptions that implied a campaign-related or  
 5 charitable purpose. For example, there are payments to: (1) Hotel L'Ancora, a hotel in Positano,  
 6 Italy, described as "Catering & Venue;" (2) FEIS Productions, the children's dance competition,  
 7 described as "Event Entertainment;" (3) the North Face, at which a purchase was made during  
 8 the Boise trip, described as "Fundraiser for Local Groups;" and (4) Educational Outfitters, the  
 9 uniform outfitter for Christian Unified Schools, described as "Gift Certificate for Donation to  
 10 Local Organization Event." It is unknown who produced or verified these descriptions.

11 **C. Additional Disbursements That May Have Been Personal Use**

12 The available information indicates that there may be other disbursements, totaling over  
 13 \$32,000 (\$21,600 within the statute of limitations period), that may have been personal use but  
 14 have yet to be reimbursed or acknowledged by the Hunters. First, although the November 16,  
 15 2016 Miscellaneous Report acknowledges many of the personal use allegations in the MUR  
 16 7058 Complaint, there are still remaining allegations (disbursements totaling \$2,045). For  
 17 instance, there are \$315 in payments to Hotel San Gallo Palace in Florence during the Italy trip,  
 18 and \$1,326 in payments to Haggen grocery store (DDHC admitted that payments to other  
 19 grocery stores were personal).<sup>26</sup> Second, DDHC's disclosure reports include approximately

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<sup>24</sup> *Duncan Duane on Instagram: SpaceX Mountain*, [https://www.instagram.com/p/8XF\\_yek6uU](https://www.instagram.com/p/8XF_yek6uU) (uploaded on Oct. 2, 2015). The payments to Disneyland were made on September 28, 2015.

<sup>25</sup> MUR 7058 Compl. at 6; MUR 7058 First Supp. Compl. at 2.

<sup>26</sup> See MUR 7058 Compl. at 5; MUR 7058 First Supp. Compl. at 2.

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1    \$30,000 in disbursements that are substantially similar or apparently connected to the admitted  
 2    personal disbursements, raising questions of personal use. Specifically, they include  
 3    disbursements made for groceries, an oil change, gasoline, travel, retail store purchases, and  
 4    dining at a fast food restaurant.

5            **D.      Salary and Reimbursement Payments to Margaret Hunter**

6            The MUR 7058 Complaint alleges that Margaret Hunter may not have performed *bona*  
 7    *fide* work in exchange for her \$3,000 (formerly \$2,000) per-month salary and, further, that  
 8    reimbursement payments she received from DDHC (totaling \$15,619) may have been for  
 9    personal expenses.<sup>27</sup> The allegations are based mostly on the fact that she was an apparent  
 10   beneficiary of the personal spending described above. Respondent has neither denied the  
 11   allegations nor explained Margaret Hunter's duties and responsibilities for the campaign.

12          **III.    LEGAL ANALYSIS**

13           The Act provides that campaign funds “shall not be converted by any person to personal  
 14   use,” and defines personal use as using funds “to fulfill any commitment, obligation, or expense  
 15   of a person that would exist irrespective of the candidate’s election campaign or individual’s  
 16   duties as holder of Federal office.”<sup>28</sup> Examples of personal use, as outlined in the statute,  
 17   include utility payments, non-campaign related automobile expenses, vacations or other non-  
 18   campaign related trips, household food items, and tuition payments.<sup>29</sup>

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<sup>27</sup>           MUR 7058 Compl. at 7. From September 2011 through December 2012 and January 2014 through February 2017, Margaret Hunter received a monthly salary from DDHC of \$2,000 and \$3,000, respectively.

<sup>28</sup>           52 U.S.C. § 30114(b). Permitted uses of campaign funds include, among other things, charitable donations and any other lawful purpose that is not personal use. *Id.* § 30114(a)(1)-(6); *see* 11 C.F.R. § 113.2.

<sup>29</sup>           *Id.* § 30114(b)(2).

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1        The Commission’s implementing regulation enumerates types of disbursements that are  
2        *per se* personal use.<sup>30</sup> These include household food items or supplies, tuition payments other  
3        than those associated with training campaign staff, utility payments for any part of any personal  
4        residence of the candidate, salary payments to a member of the candidate’s family unless the  
5        family member is providing *bona fide* services and the payments are not in excess of the fair  
6        market value, and vacations.<sup>31</sup> For all other disbursements, the regulation provides that the  
7        Commission shall determine on a case-by-case basis whether a given disbursement is personal  
8        use by applying the “irrespective test” formulated in the statute.<sup>32</sup> Meal, travel, and vehicle  
9        expenses are examples of disbursements that may be personal use.<sup>33</sup>

10       The available information indicates that Rep. Hunter violated the Act by converting  
11      campaign funds to personal use. DDHC admits that it used \$65,962 in campaign funds for  
12      personal disbursements, which the Commission calculates to be \$70,726. Although Respondent  
13      does not provide any details explaining the circumstances surrounding the disbursements, it  
14      appears that the Hunters were directly responsible. First, it was the Hunters who reimbursed the  
15      Committee for the admitted personal disbursements. Second, the Hunters were in control of the  
16      campaign credit cards during the relevant period. Third, it appears that numerous admitted  
17      personal disbursements were connected to the Hunters’ personal lives.

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<sup>30</sup>       11 C.F.R. § 113.1(g)(1)(i).

<sup>31</sup>       *Id.* § 113.1(g)(1)(i)(A), (D), (E)(1), (F), (H), (J).

<sup>32</sup>       *Id.* § 113.1(g)(1)(ii).

<sup>33</sup>       *Id.*

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1        There is no basis to support DDHC's vague assertions that disbursements were  
2        "inadvertent" or "unauthorized."<sup>34</sup> Given Rep. Hunter's years of experience as a candidate and  
3        congressman and Margaret Hunter's years of experience as a salaried campaign official, it is  
4        questionable that they were capable of making hundreds of inadvertent purchases with the wrong  
5        credit card over multiple reporting periods and failed to notice that their personal funds were not  
6        used to pay for significant life expenses. Moreover, it appears that the Hunters were aware that  
7        spending campaign funds on personal items was impermissible. They made reimbursements in  
8        June and October 2015 for "personal" and "mistaken" spending, but apparently continued to use  
9        campaign funds for personal spending until shortly before the April 4, 2016 RFAI.

10        Respondent's argument that there was no violation because Rep. Hunter reimbursed  
11        DDHC which amended its disclosure reports is erroneous. Although reimbursements may  
12        mitigate a violation, they do not absolve Respondent of liability. Indeed, Rep. Hunter did not  
13        reimburse the Committee for over \$48,000 in personal disbursements until after the MUR 7058  
14        Complaint was filed. In addition, many of the other reimbursements were made in response to  
15        the RFAI and subsequent widespread news coverage months after the original disbursements  
16        were made. Furthermore, it appears that the Hunters have not fully reimbursed the Committee  
17        for the disbursements which Respondent has admitted were personal in nature (the Commission  
18        calculates that \$4,764 likely remains outstanding). And, as described above, there may \$32,000  
19        of more in personal disbursements that have neither been admitted nor reimbursed.

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<sup>34</sup>        See Misc. Rpt. at 1. It is unclear what DDHC means by "unauthorized." The Committee does not contend that anyone other than the Hunters were responsible for making the disbursements.

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1           In conclusion, based on the available information, it appears that Rep. Hunter converted  
2    campaign funds to personal use. Therefore, the Commission finds reason to believe that Rep.  
3    Hunter violated 52 U.S.C. § 30114(b).

# FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

Respondent: Margaret Hunter MURs 7058 & 7233

## I. INTRODUCTION

9       These matters were generated by complaints filed with the Federal Election Commission  
10      by Citizens for Responsibility and Ethics in Washington and Nicole Carroll alleging that  
11      Margaret Hunter violated the Federal Election Campaign Act of 1971, as amended (the “Act”)  
12      by converting campaign funds to personal use. For the reasons stated below, the Commission  
13      finds reason to believe that Margaret Hunter violated 52 U.S.C. § 30114(b).

## 14 II. FACTUAL BACKGROUND

15 Rep. Duncan D. Hunter has been the congressman from California’s 50th congressional  
16 district since 2013, and previous to that he represented California’s 52nd congressional district  
17 since 2009. Duncan D. Hunter for Congress and Chris Marston in his official capacity as  
18 treasurer (the “Committee” or “DDHC”) is his principal campaign committee. Margaret Hunter,  
19 his wife, receives a salary from DDHC for “campaign consulting” and “campaign management  
20 services.”<sup>1</sup> Rep. Hunter has publicly stated that he and Margaret Hunter were the sole holders of  
21 the only two credit cards issued by DDHC during the relevant period.<sup>2</sup> Almost all of the alleged  
22 personal spending was apparently made using the two campaign credit cards.<sup>3</sup>

<sup>1</sup> See, e.g., DDHC 2017 Apr. Quarterly Rpt. at 53 (Apr. 15, 2017).

<sup>2</sup> Morgan Cook, *Hunter Repaid Funds Spent on Surf Shop, Garage Door*, SAN DIEGO UNION-TRIBUNE, Apr. 19, 2016 (cited by MUR 7058 Compl. at 3 (Apr. 29, 2016)); Olivia Nuzzi, *Trump's Guy, Rep. Duncan Hunter, Spent Campaign \$\$\$ at Disney*, DAILY BEAST, Apr. 10, 2016 (cited by MUR 7058 First Supp. Compl. at 1 (May 11, 2016)); Morgan Cook, *Did Hunter Campaign Pay for his Kids' School Lunches?*, SAN DIEGO UNION-TRIBUNE, June 15, 2016 (attached to MUR 7058 Second Supp. Compl. (July 21, 2016)).

<sup>3</sup> This is based on statements in the Responses and notations in the Committee's disclosure reports. *See, e.g.*, DDHC Misc. Report to FEC (Nov. 16, 2016).

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1        The improper spending can be divided into the following four categories, which are  
2    discussed in further detail in Sections II.A-D below: (1) 112 disbursements totaling at least  
3    \$18,939 reported on the Committee's original reports with the word "personal" or "mistaken";  
4    (2) several hundred disbursements totaling at least \$48,642 initially reported with campaign-  
5    related purposes, but later disclosed as personal in a Miscellaneous Report; (3) over 100  
6    additional disbursements totaling approximately \$32,000 reported with campaign-related  
7    purposes, but that may have been personal use based on the available information; and (4) salary  
8    payments (\$3,000 per-month) and reimbursements totaling \$15,619 from the Committee to  
9    Margaret Hunter that are alleged to have not been for *bona fide* campaign work.

10        **A.    Disbursements Reported on Original Disclosure Reports With the Word  
11        "Personal" or "Mistaken" Listed as the Purpose**

12        Between March 31, 2015 and March 29, 2016, DDHC made 112 disbursements totaling  
13    at least \$18,939 that, with few exceptions, were reported with the word "personal" or "mistaken"  
14    on the Purpose of Disbursement line on the original disclosure reports.<sup>4</sup> They were apparently  
15    related to the Hunters' personal lives. For instance, the disbursements included payments to the  
16    private school attended by their children, allegedly for tuition, and payments to fix the garage  
17    door of their residence.<sup>5</sup> In addition, a series of "mistaken" cash withdrawals were made directly  
18    to Margaret Hunter.

19        The Hunters reimbursed some disbursements while the spending was in progress, Rep.

20        Hunter reimbursed others after the Committee's spending issues were reported in the media, and

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<sup>4</sup>        E.g., "Personal Expense – To Be Paid Back" and "Mistaken Charge – To Be Reimbursed." A handful were unitemized but identified as "Mistaken Charges" on miscellaneous text forms attached to disclosure reports.

<sup>5</sup>        MUR 7058 Compl. at 4-5.

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1 additional disbursements have yet to be reimbursed.<sup>6</sup> The initial reimbursement payments were  
 2 made in June 2015 (Rep. Hunter) and October 2015 (Mrs. Hunter).<sup>7</sup> Afterwards, the Hunters  
 3 apparently continued to make “personal” and “mistaken” disbursements. However, on April 4,  
 4 2016, the Commission’s Reports Analysis Division (“RAD”) issued a Request for Additional  
 5 Information (“RFAI”)<sup>8</sup> regarding “personal” disbursements that resulted in widespread media  
 6 coverage.<sup>9</sup> Rep. Hunter almost immediately made reimbursements totaling \$11,896 — no  
 7 “personal” or “mistaken” disbursements have been reported since then.<sup>10</sup> Despite the Hunters’  
 8 aggregate \$17,311 reimbursement payments, it appears that at least \$1,302 in disbursements to  
 9 Legoland and Steam Games have not yet been reimbursed.<sup>11</sup>

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<sup>6</sup> After each of the reimbursements, DDHC amended the relevant reports to reflect that the disbursements had been repaid. *E.g.*, “Mistaken Transaction – Refunded 4/5/2016.”

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<sup>11</sup> The disbursement to Legoland was unitemized and DDHC has not disclosed the amount. Based on our calculations, Rep. Hunter repaid only \$0.50, but the true amount is likely to have been larger. The disbursements to Steam Games were amended to “Fraudulent Charge[s] – Refunded 4/5/16,” but DDHC has not reported the receipt of any refunds, and there is information suggesting the charges were not actually fraudulent. See Morgan Cook, *Rep. Hunter’s Probe Covers Possible Fraud Involving Video Game Charges*, SAN DIEGO UNION-TRIBUNE, Aug. 9, 2017 (citing a search warrant for the offices of the DDHC’s treasurer which describes an alleged “scheme to defraud First National Bank by making false statements related to video game charges which resulted in the refunding or crediting of charges not properly due”).

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**Figure 1. “Personal” and “Mistaken” Disbursements**

Category	Amount	Reimbursed	Outstanding Balance
Hawaii Trip	\$6,289	\$6,289	\$0
Online Video Games	\$1,556	\$254	\$1,302
Oral Surgery Clinic	\$1,137	\$1,137 <sup>12</sup>	\$0
Private School	\$6,150	\$6,150	\$0
Payments to Margaret Hunter	\$2,023	\$2,023	\$0
Garage Door Repair	\$1,200	\$1,200	\$0
Retail Stores	\$583	\$583	\$0
Theme Parks	<i>Unknown</i>	\$0.50	<i>Unknown</i>
<b>Total</b>	<b>\$18,939+</b>	<b>\$17,311</b>	<b>\$1,302+</b>

2 There is no information regarding what (or who) caused this spending or why it  
 3 continued for so long. Rep. Hunter, mostly through his spokesperson, has offered various  
 4 explanations to the news media suggesting it was a series of mix-ups, but information contained  
 5 in the MUR 7058 Complaint and public record suggests that some of those explanations may not  
 6 be accurate.<sup>13</sup>

7       **B. Disbursements Initially Reported With Campaign-Related Purposes but**  
 8       **Later Identified as “Personal Expenditures” on a Miscellaneous Report**

9       After the April 4, 2016 RFAI was issued and the MUR 7058 Complaint was filed, DDHC  
 10 completed an “independent financial review” of its 2016 election cycle activity and filed a  
 11 November 16, 2016 Miscellaneous Report listing numerous additional “personal  
 12 expenditures.”<sup>14</sup> The Miscellaneous Report does not identify who or what caused the spending,  
 13 but makes vague assertions that the disbursements were “unauthorized” or “inadvertently

<sup>12</sup> Includes a \$326 refund from the Center for Oral & Facial Surgery.

<sup>13</sup> See MUR 7058 Compl. at 4-5.

<sup>14</sup> DDHC Misc. Report to the FEC (Nov. 16, 2016). The report also states that, “out of an abundance of caution, the campaign has deemed any expense without adequate support as necessary for reimbursement.” *Id.* at 1. Because lack of documentation has no bearing on whether a disbursement was made irrespective of a campaign, the Commission considers any such item to be a personal disbursement, especially given that the subject line is “Duncan D. Hunter repayment of personal expenditures.” *Id.*

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1 charged.”<sup>15</sup> As discussed further below, each of the disbursements was initially reported with an  
 2 apparent campaign-related purpose. Despite admitting that the disbursements were personal,  
 3 DDHC has not amended the relevant disclosure reports.

4 Rep. Hunter repaid \$48,651 to the Committee,<sup>16</sup> which is *slightly more* than the total of  
 5 the amounts listed on the Miscellaneous Report (\$48,642). However, the Commission calculates  
 6 that the “personal expenditures” add to \$51,788 (and include 348 individual disbursements)  
 7 based on the actual amounts disclosed in the Committee’s reports.

8 ***Figure 2. “Personal Expenditures” on Nov. 16, 2016 Miscellaneous Report***

Category	Amount Listed on Misc. Report	Amount on DDHC Disclosure Reports	Difference
Travel	\$14,913	\$14,913	\$0
Utilities	\$2,743	\$4,473	\$1,730
Food	\$7,089	\$7,029	(\$60)
Retail Stores	\$14,628	\$16,182	\$1,554
Gasoline	\$6,036	\$5,957	(\$78)
Theme Parks	\$1,249	\$1,249	\$0
Miscellaneous	\$1,984	\$1,984	\$0
<b>Total</b>	<b>\$48,642</b>	<b>\$51,788</b>	<b>\$3,145</b>

9 There are multiple examples of personal disbursements that, based on the available  
 10 information, were clearly related to the Hunters’ personal lives. First, there were payments to  
 11 Ki’s Restaurant, which delivered school lunches to Christian Unified Schools, attended by the  
 12 Hunters’ children.<sup>17</sup> The disbursements were made during the school year, and the restaurant’s

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<sup>15</sup> *Id.*

<sup>16</sup> DDHC 2016 Post-General Election Rpt. at 18 (Dec. 8, 2016).

<sup>17</sup> MUR 7058 Second Supp. Compl. at 2-3.

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1 website allows parents to add value to their children's account using a credit card.<sup>18</sup> Second,  
 2 there was a purchase at Educational Outfitters, which supplied uniforms for Christian Unified  
 3 Schools.<sup>19</sup> Third, there were payments to FEIS Productions, the children's traditional Irish dance  
 4 competition at which the Hunters' daughter competed.<sup>20</sup> Fourth, there were payments in Italy at  
 5 the same time as when Rep. Hunter posted a photograph on his personal social media account of  
 6 him and his wife enjoying what appears to be the Amalfi coastline.<sup>21</sup> The disbursements  
 7 occurred in multiple Italian cities and coincided with Thanksgiving. One disbursement was to a  
 8 Florentine jewelry store disclosed with "Food/Beverages" as the purpose.<sup>22</sup>

9 Fifth, there were disbursements in Boise, Idaho for travel, accommodations, and  
 10 recreation at the same time as when Rep. Hunter posted photographs to his personal social media  
 11 account of his family floating down and fishing the Boise River.<sup>23</sup> There were also payments at  
 12 rest areas in California and Nevada, along the route from Southern California, suggesting that the  
 13 Hunters were on a road trip. Sixth, there were payments at a Disneyland gift shop and restaurant  
 14 at the same time as when Rep. Hunter posted a photograph to his personal social media account  
 15 of his family riding Space Mountain.<sup>24</sup> Seventh, there were disbursements for water, electricity,

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<sup>18</sup> *Id.* at 3.

<sup>19</sup> MUR 7058 Compl. at 6.

<sup>20</sup> *Results: - Feis Productions*, <http://www.feisinfo.com/results/schooldetails.php?feisid=78&school=Rose-Ritchie+Academy+of+Irish+Dance> (Results of Hidden Valley Feis 2015).

<sup>21</sup> MUR 7058 Compl. at 5-6.

<sup>22</sup> *Id.* at 5.

<sup>23</sup> *Duncan Duane on Instagram: Boise River Float*, <https://www.instagram.com/p/42vMAsk6kS> (uploaded July 7, 2015). Included among the Boise-related disbursements is a payment to Epleys Boise River Rental.

<sup>24</sup> *Duncan Duane on Instagram: SpaceX Mountain*, [https://www.instagram.com/p/8XF\\_yek6uU](https://www.instagram.com/p/8XF_yek6uU) (uploaded on Oct. 2, 2015). The payments to Disneyland were made on September 28, 2015.

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1 and Internet at the same time as when Rep. Hunter was apparently using his personal residence  
 2 as campaign headquarters.<sup>25</sup>

3 These disbursements were reported with descriptions that implied a campaign-related or  
 4 charitable purpose. For example, there are payments to: (1) Hotel L'Ancora, a hotel in Positano,  
 5 Italy, described as "Catering & Venue;" (2) FEIS Productions, the children's dance competition,  
 6 described as "Event Entertainment;" (3) the North Face, at which a purchase was made during  
 7 the Boise trip, described as "Fundraiser for Local Groups;" and (4) Educational Outfitters, the  
 8 uniform outfitter for Christian Unified Schools, described as "Gift Certificate for Donation to  
 9 Local Organization Event." It is unknown who produced or verified these descriptions.

10 **C. Additional Disbursements That May Have Been Personal Use**

11 The available information indicates that there may be other disbursements, totaling over  
 12 \$32,000 (\$21,600 within the statute of limitations period), that may have been personal use but  
 13 have yet to be reimbursed or acknowledged by the Hunters. First, although the November 16,  
 14 2016 Miscellaneous Report acknowledges many of the personal use allegations in the MUR  
 15 7058 Complaint, there are still remaining allegations (disbursements totaling \$2,045). For  
 16 instance, there are \$315 in payments to Hotel San Gallo Palace in Florence during the Italy trip,  
 17 and \$1,326 in payments to Haggen grocery store (DDHC admitted that payments to other  
 18 grocery stores were personal).<sup>26</sup> Second, DDHC's disclosure reports include approximately  
 19 \$30,000 in disbursements that are substantially similar or apparently connected to the admitted  
 20 personal disbursements, raising questions of personal use. Specifically, they include

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<sup>25</sup> MUR 7058 Compl. at 6; MUR 7058 First Supp. Compl. at 2.

<sup>26</sup> See MUR 7058 Compl. at 5; MUR 7058 First Supp. Compl. at 2.

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1 disbursements made for groceries, an oil change, gasoline, travel, retail store purchases, and  
2 dining at a fast food restaurant.

3 **D. Salary and Reimbursement Payments to Margaret Hunter**

4 The MUR 7058 Complaint alleges that Margaret Hunter may not have performed *bona*  
5 *fide* work in exchange for her \$3,000 (formerly \$2,000) per-month salary and, further, that  
6 reimbursement payments she received from DDHC (totaling \$15,619) may have been for  
7 personal expenses.<sup>27</sup> The allegations are based mostly on the fact that she was an apparent  
8 beneficiary of the personal spending described above. Respondent has neither denied the  
9 allegations nor explained her duties and responsibilities for the campaign.

10 **III. LEGAL ANALYSIS**

11 The Act provides that campaign funds “shall not be converted by any person to personal  
12 use,” and defines personal use as using funds “to fulfill any commitment, obligation, or expense  
13 of a person that would exist irrespective of the candidate’s election campaign or individual’s  
14 duties as holder of Federal office.”<sup>28</sup> Examples of personal use, as outlined in the statute,  
15 include utility payments, non-campaign related automobile expenses, vacations or other non-  
16 campaign related trips, household food items, and tuition payments.<sup>29</sup>

17 The Commission’s implementing regulation enumerates types of disbursements that are  
18 *per se* personal use.<sup>30</sup> These include household food items or supplies, tuition payments other  
19 than those associated with training campaign staff, utility payments for any part of any personal

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<sup>27</sup> MUR 7058 Compl. at 7. From September 2011 through December 2012 and January 2014 through February 2017, Margaret Hunter received a monthly salary from DDHC of \$2,000 and \$3,000, respectively.

<sup>28</sup> 52 U.S.C. § 30114(b). Permitted uses of campaign funds include, among other things, charitable donations and any other lawful purpose that is not personal use. *Id.* § 30114(a)(1)-(6); *see* 11 C.F.R. § 113.2.

<sup>29</sup> *Id.* § 30114(b)(2).

<sup>30</sup> 11 C.F.R. § 113.1(g)(1)(i).

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1 residence of the candidate, salary payments to a member of the candidate's family unless the  
 2 family member is providing *bona fide* services and the payments are not in excess of the fair  
 3 market value, and vacations.<sup>31</sup> For all other disbursements, the regulation provides that the  
 4 Commission shall determine on a case-by-case basis whether a given disbursement is personal  
 5 use by applying the "irrespective test" formulated in the statute.<sup>32</sup> Meal, travel, and vehicle  
 6 expenses are examples of disbursements that may be personal use.<sup>33</sup>

7 The available information indicates that Margaret Hunter violated the Act by converting  
 8 campaign funds to personal use. DDHC admits that it used \$65,962 in campaign funds for  
 9 personal disbursements, which the Commission calculates to be \$70,726. Although Respondent  
 10 does not provide any details explaining the circumstances surrounding the disbursements, it  
 11 appears that the Hunters were directly responsible. First, it was the Hunters who reimbursed the  
 12 Committee for the admitted personal disbursements. Second, the Hunters were in control of the  
 13 campaign credit cards during the relevant period. Third, it appears that numerous admitted  
 14 personal disbursements were connected to the Hunters' personal lives.

15 There is no basis to support DDHC's vague assertions that disbursements were  
 16 "inadvertent" or "unauthorized."<sup>34</sup> Given Rep. Hunter's years of experience as a candidate and  
 17 congressman and Margaret Hunter's years of experience as a salaried campaign official, it is  
 18 questionable that they were capable of making hundreds of inadvertent purchases with the wrong  
 19 credit card over multiple reporting periods and failed to notice that their personal funds were not

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<sup>31</sup> *Id.* § 113.1(g)(1)(i)(A), (D), (E)(1), (F), (H), (J).

<sup>32</sup> *Id.* § 113.1(g)(1)(ii).

<sup>33</sup> *Id.*

<sup>34</sup> See Misc. Rpt. at 1. It is unclear what DDHC means by "unauthorized." The Committee does not contend that anyone other than the Hunters were responsible for making the disbursements.

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1 used to pay for significant life expenses. Moreover, it appears that the Hunters were aware that  
2 spending campaign funds on personal items was impermissible. They made reimbursements in  
3 June and October 2015 for “personal” and “mistaken” spending, but apparently continued to use  
4 campaign funds for personal spending until shortly before the April 4, 2016 RFAI.

5 Respondent’s argument that there was no violation because Rep. Hunter reimbursed  
6 DDHC which amended its disclosure reports is erroneous. Although reimbursements may  
7 mitigate a violation, they do not absolve Respondent of liability. Indeed, Rep. Hunter did not  
8 reimburse the Committee for over \$48,000 in personal disbursements until after the MUR 7058  
9 Complaint was filed. In addition, many of the other reimbursements were made in response to  
10 the RFAI and subsequent widespread news coverage months after the original disbursements  
11 were made. Furthermore, it appears that the Hunters have not fully reimbursed the Committee  
12 for the disbursements which DDHC has admitted were personal in nature (the Commission  
13 calculates that \$4,764 likely remains outstanding). And, as described above, there may \$32,000  
14 of more in personal disbursements that have neither been admitted nor reimbursed.

15 In conclusion, based on the available information, it appears Margaret Hunter converted  
16 campaign funds to personal use. Therefore, the Commission finds reason to believe that  
17 Margaret Hunter violated 52 U.S.C. § 30114(b).

## FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

Respondent: Duncan D. Hunter for Congress and  
Chris Marston in his official  
capacity as treasurer MURs 7058, 7228, & 7233

## I. INTRODUCTION

11 These matters were generated by complaints filed with the Federal Election Commission  
12 by Citizens for Responsibility and Ethics in Washington and 54 individual complainants alleging  
13 that Duncan D. Hunter for Congress and Chris Marston in his official capacity as treasurer (the  
14 “Committee” or “DDHC”), Rep. Duncan D. Hunter’s principal campaign committee, violated  
15 the Federal Election Campaign Act of 1971, as amended (the “Act”) by converting campaign  
16 funds to personal use. For the reasons stated below, the Commission finds reason to believe that  
17 DDHC violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use, and also  
18 finds reason to believe that DDHC violated 52 U.S.C. § 30104(b)(6)(A) by failing to accurately  
19 report disbursements.

## 20 II. FACTUAL BACKGROUND

21 Rep. Duncan D. Hunter has been the congressman from California’s 50th congressional  
22 district since 2013, and previous to that he represented California’s 52nd congressional district  
23 since 2009. Margaret Hunter, his wife, receives a salary from DDHC for “campaign consulting”  
24 and “campaign management services.”<sup>1</sup> Rep. Hunter has publicly stated that he and Margaret  
25 Hunter were the sole holders of the only two credit cards issued by DDHC during the relevant

<sup>1</sup> See, e.g., DDHC 2017 Apr. Quarterly Rpt. at 53 (Apr. 15, 2017).

MURs 7058/7228/7233 (Duncan D. Hunter for Congress)

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1 period.<sup>2</sup> Almost all of the alleged personal spending was apparently made using the two  
 2 campaign credit cards.<sup>3</sup>

3       The improper spending can be divided into the following four categories, which are  
 4 discussed in further detail in Sections II.A-D below: (1) 112 disbursements totaling at least  
 5 \$18,939 reported on the Committee's original reports with the word "personal" or "mistaken";  
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12       **A. Disbursements Reported on Original Disclosure Reports With the Word**  
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<sup>3</sup>       This is based on statements in the Responses and notations in the Committee's disclosure reports. *See, e.g.*, MUR 7058 Second Supp. Resp. (Nov. 21, 2016), Attach. at 1 (DDHC Misc. Report to FEC) (Nov. 16, 2016).

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MURs 7058/7228/7233 (Duncan D. Hunter for Congress)

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MURs 7058/7228/7233 (Duncan D. Hunter for Congress)

## Factual and Legal Analysis

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*Figure 1. “Personal” and “Mistaken” Disbursements*

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Retail Stores	\$583	\$583	\$0
Theme Parks	<i>Unknown</i>	\$0.50	<i>Unknown</i>
<b>Total</b>	<b>\$18,939+</b>	<b>\$17,311</b>	<b>\$1,302+</b>

2 There is no information regarding what (or who) caused this spending or why it  
3 continued for so long. Rep. Hunter, mostly through his spokesperson, has offered various  
4 explanations to the news media suggesting it was a series of mix-ups, but information contained  
5 in the MUR 7058 Complaint and public record suggests that some of those explanations may not  
6 be accurate.<sup>13</sup>

**B. Disbursements Initially Reported With Campaign-Related Purposes but Later Identified as “Personal Expenditures” on a Miscellaneous Report**

9 After the April 4, 2016 RFAI was issued and the MUR 7058 Complaint was filed, DDHC  
10 completed an “independent financial review” of its 2016 election cycle activity and filed a  
11 November 16, 2016 Miscellaneous Report listing numerous additional “personal expenditures.”  
12 Respondent also filed a supplement in MUR 7058, attaching the Miscellaneous Report.<sup>14</sup> The

Steam Games were amended to “Fraudulent Charge[s] – Refunded 4/5/16,” but DDHC has not reported the receipt of any refunds, and there is information suggesting the charges were not actually fraudulent. *See infra* note 36.

<sup>12</sup> Includes a \$326 refund from the Center for Oral & Facial Surgery.

<sup>13</sup> See MUR 7058 Compl. at 4-5.

<sup>14</sup> MUR 7058 Second Supp. Resp., Attach. (DDHC Misc. Report to the FEC) (Nov. 16, 2016). The report also states that, “out of an abundance of caution, the campaign has deemed any expense without adequate support as necessary for reimbursement.” *Id.* at 1. Because lack of documentation has no bearing on whether a disbursement

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1      Miscellaneous Report does not identify who or what caused the spending, but makes vague  
 2      assertions that the disbursements were “unauthorized” or “inadvertently charged.”<sup>15</sup> As  
 3      discussed further below, each of the disbursements was initially reported with an apparent  
 4      campaign-related purpose. Despite admitting that the disbursements were personal, DDHC has  
 5      not amended the relevant disclosure reports.

6              Rep. Hunter repaid \$48,651 to the Committee,<sup>16</sup> which is *slightly more* than the total of  
 7      the amounts listed on the Miscellaneous Report (\$48,642). However, the Commission calculates  
 8      that the “personal expenditures” add to \$51,788 (and include 348 individual disbursements)  
 9      based on the actual amounts disclosed in the Committee’s reports.

10              ***Figure 2. “Personal Expenditures” on Nov. 16, 2016 Miscellaneous Report***

Category	Amount Listed on Misc. Report	Amount on DDHC Disclosure Reports	Difference
Travel	\$14,913	\$14,913	\$0
Utilities	\$2,743	\$4,473	\$1,730
Food	\$7,089	\$7,029	(\$60)
Retail Stores	\$14,628	\$16,182	\$1,554
Gasoline	\$6,036	\$5,957	(\$78)
Theme Parks	\$1,249	\$1,249	\$0
Miscellaneous	\$1,984	\$1,984	\$0
<b>Total</b>	<b>\$48,642</b>	<b>\$51,788</b>	<b>\$3,145</b>

11              There are multiple examples of personal disbursements that, based on the available  
 12      information, were clearly related to the Hunters’ personal lives. First, there were payments to

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was made irrespective of a campaign, the Commission considers any such item to be a personal disbursement, especially given that the subject line is “Duncan D. Hunter repayment of personal expenditures.” *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> DDHC 2016 Post-General Election Rpt. at 18 (Dec. 8, 2016).

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1 Ki's Restaurant, which delivered school lunches to Christian Unified Schools, attended by the  
 2 Hunters' children.<sup>17</sup> The disbursements were made during the school year, and the restaurant's  
 3 website allows parents to add value to their children's account using a credit card.<sup>18</sup> Second,  
 4 there was a purchase at Educational Outfitters, which supplied uniforms for Christian Unified  
 5 Schools.<sup>19</sup> Third, there were payments to FEIS Productions, the children's traditional Irish dance  
 6 competition at which the Hunters' daughter competed.<sup>20</sup> Fourth, there were payments in Italy at  
 7 the same time as when Rep. Hunter posted a photograph on his personal social media account of  
 8 him and his wife enjoying what appears to be the Amalfi coastline.<sup>21</sup> The disbursements  
 9 occurred in multiple Italian cities and coincided with Thanksgiving. One disbursement was to a  
 10 Florentine jewelry store disclosed with "Food/Beverages" as the purpose.<sup>22</sup>

11       Fifth, there were disbursements in Boise, Idaho for travel, accommodations, and  
 12 recreation at the same time as when Rep. Hunter posted photographs to his personal social media  
 13 account of his family floating down and fishing the Boise River.<sup>23</sup> There were also payments at  
 14 rest areas in California and Nevada, along the route from Southern California, suggesting that the  
 15 Hunters were on a road trip. Sixth, there were payments at a Disneyland gift shop and restaurant  
 16 at the same time as when Rep. Hunter posted a photograph to his personal social media account

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<sup>17</sup> MUR 7058 Second Supp. Compl. at 2-3.

<sup>18</sup> *Id.* at 3.

<sup>19</sup> MUR 7058 Compl. at 6.

<sup>20</sup> *Results: - Feis Productions*, <http://www.feisinfo.com/results/schooldetails.php?feisid=78&school=Rose-Ritchie+Academy+of+Irish+Dance> (Results of Hidden Valley Feis 2015).

<sup>21</sup> MUR 7058 Compl. at 5-6.

<sup>22</sup> *Id.* at 5.

<sup>23</sup> *Duncan Duane on Instagram: Boise River Float*, <https://www.instagram.com/p/42vMAsk6kS> (uploaded July 7, 2015). Included among the Boise-related disbursements is a payment to Epleys Boise River Rental.

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1 of his family riding Space Mountain.<sup>24</sup> Seventh, there were disbursements for water, electricity,  
 2 and Internet at the same time as when Rep. Hunter was apparently using his personal residence  
 3 as campaign headquarters.<sup>25</sup>

4 These disbursements were reported with descriptions that implied a campaign-related or  
 5 charitable purpose. For example, there are payments to: (1) Hotel L’Ancora, a hotel in Positano,  
 6 Italy, described as “Catering & Venue;” (2) FEIS Productions, the children’s dance competition,  
 7 described as “Event Entertainment;” (3) the North Face, at which a purchase was made during  
 8 the Boise trip, described as “Fundraiser for Local Groups;” and (4) Educational Outfitters, the  
 9 uniform outfitter for Christian Unified Schools, described as “Gift Certificate for Donation to  
 10 Local Organization Event.” It is unknown who produced or verified these descriptions.

### 11           C.     **Additional Disbursements That May Have Been Personal Use**

12           The available information indicates that there may be other disbursements, totaling over  
 13 \$32,000 (\$21,600 within the statute of limitations period), that may have been personal use but  
 14 have yet to be reimbursed or acknowledged by the Hunters. First, although the November 16,  
 15 2016 Miscellaneous Report acknowledges many of the personal use allegations in the MUR  
 16 7058 Complaint, there are still remaining allegations (disbursements totaling \$2,045). For  
 17 instance, there are \$315 in payments to Hotel San Gallo Palace in Florence during the Italy trip,  
 18 and \$1,326 in payments to Haggen grocery store (DDHC admitted that payments to other  
 19 grocery stores were personal).<sup>26</sup> Second, DDHC’s disclosure reports include approximately

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<sup>24</sup>       *Duncan Duane on Instagram: SpaceX Mountain*, [https://www.instagram.com/p/8XF\\_yek6uU](https://www.instagram.com/p/8XF_yek6uU) (uploaded on Oct. 2, 2015). The payments to Disneyland were made on September 28, 2015.

<sup>25</sup>       MUR 7058 Compl. at 6; MUR 7058 First Supp. Compl. at 2.

<sup>26</sup>       See MUR 7058 Compl. at 5; MUR 7058 First Supp. Compl. at 2.

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1    \$30,000 in disbursements that are substantially similar or apparently connected to the admitted  
 2    personal disbursements, raising questions of personal use. Specifically, they include  
 3    disbursements made for groceries, an oil change, gasoline, travel, retail store purchases, and  
 4    dining at a fast food restaurant.

5            **D.      Salary and Reimbursement Payments to Margaret Hunter**

6            The MUR 7058 Complaint alleges that Margaret Hunter may not have performed *bona*  
 7    *fide* work in exchange for her \$3,000 (formerly \$2,000) per-month salary and, further, that  
 8    reimbursement payments she received from DDHC (totaling \$15,619) may have been for  
 9    personal expenses.<sup>27</sup> The allegations are based mostly on the fact that she was an apparent  
 10   beneficiary of the personal spending described above. Respondent has neither denied the  
 11   allegations nor explained Margaret Hunter's duties and responsibilities for the campaign.

12        **III.    LEGAL ANALYSIS**

13            **A.      There is Reason to Believe that DDHC Converted Campaign Funds to**  
 14    **Personal Use in Violation of 52 U.S.C. § 30114(b)**

15            The Act provides that campaign funds “shall not be converted by any person to personal  
 16   use,” and defines personal use as using funds “to fulfill any commitment, obligation, or expense  
 17   of a person that would exist irrespective of the candidate’s election campaign or individual’s  
 18   duties as holder of Federal office.”<sup>28</sup> Examples of personal use, as outlined in the statute,  
 19   include utility payments, non-campaign related automobile expenses, vacations or other non-  
 20   campaign related trips, household food items, and tuition payments.<sup>29</sup>

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<sup>27</sup>            MUR 7058 Compl. at 7. From September 2011 through December 2012 and January 2014 through February 2017, Margaret Hunter received a monthly salary from DDHC of \$2,000 and \$3,000, respectively.

<sup>28</sup>            52 U.S.C. § 30114(b). Permitted uses of campaign funds include, among other things, charitable donations and any other lawful purpose that is not personal use. *Id.* § 30114(a)(1)-(6); *see* 11 C.F.R. § 113.2.

<sup>29</sup>            *Id.* § 30114(b)(2).

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1        The Commission's implementing regulation enumerates types of disbursements that are  
2        *per se* personal use.<sup>30</sup> These include household food items or supplies, tuition payments other  
3        than those associated with training campaign staff, utility payments for any part of any personal  
4        residence of the candidate, salary payments to a member of the candidate's family unless the  
5        family member is providing *bona fide* services and the payments are not in excess of the fair  
6        market value, and vacations.<sup>31</sup> For all other disbursements, the regulation provides that the  
7        Commission shall determine on a case-by-case basis whether a given disbursement is personal  
8        use by applying the "irrespective test" formulated in the statute.<sup>32</sup> Meal, travel, and vehicle  
9        expenses are examples of disbursements that may be personal use.<sup>33</sup>

10       The available information indicates that DDHC violated the Act by converting campaign  
11      funds to personal use. DDHC admits that it used \$65,962 in campaign funds for personal  
12      disbursements, which the Commission calculates to be \$70,726. Although Respondent does not  
13      provide any details explaining the circumstances surrounding the disbursements, it appears that  
14      the Hunters were directly responsible. First, it was the Hunters who reimbursed the Committee  
15      for the admitted personal disbursements. Second, the Hunters were in control of the campaign  
16      credit cards during the relevant period. Third, it appears that numerous admitted personal  
17      disbursements were connected to the Hunters' personal lives.

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<sup>30</sup>       11 C.F.R. § 113.1(g)(1)(i).

<sup>31</sup>       *Id.* § 113.1(g)(1)(i)(A), (D), (E)(1), (F), (H), (J).

<sup>32</sup>       *Id.* § 113.1(g)(1)(ii).

<sup>33</sup>       *Id.*

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1        There is no basis to support DDHC's vague assertions that disbursements were  
2        "inadvertent" or "unauthorized."<sup>34</sup> Given Rep. Hunter's years of experience as a candidate and  
3        congressman and Margaret Hunter's years of experience as a salaried campaign official, it is  
4        questionable that they were capable of making hundreds of inadvertent purchases with the wrong  
5        credit card over multiple reporting periods and failed to notice that their personal funds were not  
6        used to pay for significant life expenses. Moreover, it appears that the Hunters were aware that  
7        spending campaign funds on personal items was impermissible. They made reimbursements in  
8        June and October 2015 for "personal" and "mistaken" spending, but apparently continued to use  
9        campaign funds for personal spending until shortly before the April 4, 2016 RFAI.

10        Respondent's argument that there was no violation because Rep. Hunter reimbursed  
11        DDHC which amended its disclosure reports is erroneous. Although reimbursements may  
12        mitigate a violation, they do not absolve Respondent of liability. Indeed, Rep. Hunter did not  
13        reimburse the Committee for over \$48,000 in personal disbursements until after the MUR 7058  
14        Complaint was filed. In addition, many of the other reimbursements were made in response to  
15        the RFAI and subsequent widespread news coverage months after the original disbursements  
16        were made. Furthermore, it appears that the Hunters have not fully reimbursed the Committee  
17        for the disbursements which Respondent has admitted were personal in nature (the Commission  
18        calculates that \$4,764 likely remains outstanding). And, as described above, there may \$32,000  
19        of more in personal disbursements that have neither been admitted nor reimbursed.

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<sup>34</sup>        See Misc. Rpt. at 1. It is unclear what DDHC means by "unauthorized." The Committee does not contend that anyone other than the Hunters were responsible for making the disbursements.

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1           In conclusion, based on the available information, it appears that DDHC converted  
 2 campaign funds to personal use. Therefore, the Commission finds reason to believe that DDHC  
 3 violated 52 U.S.C. § 30114(b).

4           **B.       There is Reason to Believe That DDHC violated 52 U.S.C. § 30104(b)(6)(A)**  
 5           **by Failing to Accurately Report Disbursements**

6           Political committees shall disclose the name and address of each person who has received  
 7 a disbursement in an aggregate amount or value in excess of \$200 within the calendar year or  
 8 election cycle, in the case of an authorized committee, together with the date, amount, and  
 9 purpose of any such disbursement.<sup>35</sup>

10           As described above, DDHC failed to accurately describe the purpose of over \$50,000 in  
 11 disbursements that were actually converted to personal use. For example, at least \$48,651 in  
 12 disbursements initially disclosed with campaign-related purposes were subsequently identified  
 13 on the November 16, 2016 Miscellaneous Report as “personal expenditures.” There have been  
 14 no amendments. In addition, it appears that DDHC inaccurately reported online video game  
 15 purchases totaling \$1,302 as “Fraudulent Charge[s] – Refunded 4/5/16” when DDHC in fact  
 16 disclosed no actual refunds.<sup>36</sup>

17           Finally, DDHC failed to itemize several disbursements exceeding the aggregate \$200  
 18 threshold, including payments to: (1) Steam Games (unknown amount) on April 28, 2015,  
 19 because during the same election cycle, DDHC reported other disbursements totaling \$1,424 to

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<sup>35</sup>           52 U.S.C. § 30104(b)(6)(A); *see also* 11 C.F.R. § 104.3(b)(4).

<sup>36</sup>           Further, there is information on the public record suggesting that the disbursements were not the result of fraudulent activity on the credit card. *See* Morgan Cook, *Rep. Hunter's Probe Covers Possible Fraud Involving Video Game Charges*, SAN DIEGO UNION-TRIBUNE, Aug. 9, 2017 (citing a search warrant for the offices of the DDHC's treasurer which describes an alleged “scheme to defraud First National Bank by making false statements related to video game charges which resulted in the refunding or crediting of charges not properly due”).

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1 Steam Games; (2) Firenze S.M.N. Self Service (\$320) sometime in 2015; and (3) Rubio's (\$38)  
2 on July 23, 2015, because during the same election cycle, DDHC reported other disbursements  
3 totaling \$194 to Rubio's.<sup>37</sup>

4 Therefore, the Commission finds reason to believe that DDHC violated 52 U.S.C.  
5 § 30104(b)(6)(A) by failing to accurately report disbursements.

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<sup>37</sup> DDHC Amended 2015 July Quarterly Rpt. at 5 (Apr. 15, 2016) (Misc. Text); DDHC Miscellaneous Text Form to the FEC (Nov. 16, 2016).