



NICOLE CARROLL

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ESCONDIDO CA 92025

March 11, 2017

OFFICE OF GENERAL COUNSEL

Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

MUR # 7233

Re: Request for Further Investigation or Audit Regarding Duncan D. Hunter for Congress

Dear Sir/Madam:

As a constituent and voter in Southern California, I respectfully request that the Federal Election Commission commence an investigation into expenditures from Duncan D. Hunter for Congress ("Hunter Committee") the primary campaign committee of Representative Duncan D. Hunter – R-CA – to assure that they meet Federal Election Campaign Act (FECA) and FEC regulations.

In April 2016, the FEC conducted a similar investigation into 66 disbursements to "Steam Games" occurring between 10/13/2015 and 12/16/2015. As a result of this investigation, there exist comments in each of these itemized charges in the FEC's Two Year Summary Report 2016 that read "Fraudulent Charge".<sup>1</sup>

An additional group of charges that I find puzzling and request further inquiry into are 33 disbursements to "Margaret Hunter" between 1/6/2015 and 11/29/2016 for a total of \$8,640.<sup>2</sup> Apparently Mrs. Hunter serves as "Campaign Consultant" to her husband for \$3,000/month, but these charges appear to have been outside of her salary.

Mr. Hunter's highly irregular and liberal interpretation of FECA and FEC regulations have been widely recognized by the press (e.g. San Diego Union Tribune - most recently on 11/16/2016<sup>3</sup>, Los Angeles Times on 11/17/2016<sup>4</sup>, Salon Magazine on 11/4/2016<sup>5</sup>, ABC News on April 7, 2016<sup>6</sup> and USA Today on 1/4/2017<sup>7</sup> to name a few). Additionally, on April 28, 2016, Citizens

Nicole Carroll

<sup>1</sup> See <http://www.fec.gov/fecviewer/CandCmteTransaction.do>.

<sup>2</sup> Duncan D. Hunter for Congress, FEC Form 3, Two Year Summary Report 2016, available at <http://docquery.fec.gov/cgi-bin/fecimg/?201604159012567441>.

<sup>3</sup> See <http://www.sandiegouniontribune.com/news/watchdog/sd-me-hunter-spending-20161116-story.htm>.

<sup>4</sup> See <http://www.latimes.com/local/lanow/la-me-duncan-hunter-20161117-story.html>.

<sup>5</sup> See <http://www.salon.com/2016/11/04/rep-duncan-hunter-spent-49000-in-campaign-funds-on-video-games-a-disneyland-trip-and-other-personal-expenses/>.

<sup>6</sup> Rep. Duncan Hunter Under Fire Over Spending, ABC 10News, April 7, 2016, available at <https://www.youtube.com/watch?v=xnwjzaUHRpc>.

<sup>7</sup> See <http://www.usatoday.com/story/news/politics/onpolitics/2017/01/04/duncan-hunter-campaign-funds-rabbit/96147014>.

for Responsibility and Ethics in Washington formally requested that the FEC conduct a full audit of campaign disbursements over the last two years<sup>8</sup>.

Borrowing from the summary statement made in CREW's request to the FEC for a full audit: "To ensure that the money raised for political campaigns is not misused, campaign finance law clearly forbids spending campaign funds on the personal expenses of a candidate or a candidate's family. The Hunter Committee already has admitted it did exactly that, making thousands of dollars in payments for expenditures unrelated to Rep. Hunter's campaign. A review of the committee's disclosure reports further indicates it may have made additional disbursements for personal expenses."<sup>9</sup>

I have drawn attention to one category of such disbursements in this letter. I hereby request that the FEC conduct further review of the Hunter Committee to assure that it is in compliance with the law. I look forward to hearing from you.

Sincerely,

  

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<sup>8</sup> See <http://s3.amazonaws.com/storage.citizensforethics.org/wp-content/uploads/2016/07/20021535/Duncan%20Hunter%20FEC%20request%20for%20audit%204-28-16.pdf>.

<sup>9</sup> Id.

# CALIFORNIA JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )

County of San Diego )

Subscribed and sworn to (or affirmed) before me on this 11<sup>th</sup> day

of March, 20 17, by Nicole Carrols

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



(Seal)

Signature Joan C Bennett

## Optional Information

Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this jurat to an unauthorized document and may prove useful to persons relying on the attached document.

### Description of Attached Document

This certificate is attached to a document titled/for the purpose of

Ethics Complaint Letter

containing 2 pages, and dated March 11, 2017.

### Additional Information

#### Method of Affiant Identification

Proved to me on the basis of satisfactory evidence:  
 Form(s) of identification     credible witness(es)

Notarial event is detailed in notary journal on:  
Page # 7 Entry # 6

Notary contact: \_\_\_\_\_

#### Other

Affiant(s) Thumbprint(s)     Describe: \_\_\_\_\_