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SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

September 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DUNCAN D. HUNTER (1),
MARGARET E. HUNTER (2),

Defendants.

Case No. 18CR3677W

INDICTMENT

Title 18, U.S.C., Sec. 371 – Conspiracy to Commit Offenses; Title 18, U.S.C., Sec. 1343 – Wire Fraud; Title 18, U.S.C., Sec. 1519 – Falsification of Records; Title 52, U.S.C., Secs. 30109(d) and 30114(b)(1) – Prohibited Use of Campaign Contributions; Title 18, U.S.C., Sec. 1344 – Bank Fraud; Title 18, U.S.C., Sec. 2 – Aiding and Abetting

The grand jury charges at all times relevant herein:

The Integrity of the Electoral Process

1. United States citizens have a right to choose their political representatives through free and fair elections. To ensure the integrity, accountability, and transparency of federal elections, Congress enacted a series of laws governing campaign fundraising and spending. Among other things, these laws strictly regulate the use of funds donated to candidates for federal office, and require public disclosure of the use of those funds.

2. Campaign funds raised by candidates and Members of Congress are largely restricted to supporting the candidate's election (or re-election) efforts and duties in office, and cannot be used for their own or their family's personal use or enjoyment. This restriction helps prevent donors from exercising undue influence over candidates and federal officeholders.

1 3. The prohibition against personal use of campaign funds prohibits the
2 disbursement of campaign funds for any expense that would exist irrespective of a
3 candidate's election campaign or duties as a holder of federal office. Among other such
4 personal expenses, candidates and Members of Congress are explicitly prohibited from
5 spending campaign funds on clothing, vacations, household food items, school tuition,
6 utilities, payments to recreational facilities, and entertainment not associated with the
7 election campaign.

8 4. Federal law also requires regular disclosure of the receipt and disbursement of
9 campaign funds. Specifically, candidates for election (or re-election) to the U.S. House of
10 Representatives must periodically file public reports with the Federal Election Commission
11 ("FEC") that disclose, among other things, the total amount of their disbursements, as well
12 as the recipient and purpose of any expenditure totaling more than \$200 (in aggregate)
13 during any two-year election cycle. These reports provide citizens with a record of the
14 expenditure of campaign funds, provide donors with a measure of accountability with
15 regard to the use of funds, and assist voters in making informed decisions at the polls.

16 5. The FEC is an independent regulatory agency of the United States whose
17 purpose is to enforce campaign finance laws in United States federal elections. Among other
18 things, the FEC – along with the Federal Bureau of Investigation ("FBI"), an agency of the
19 United States – is responsible for investigating the potential improper use of campaign funds
20 by candidates for elected office and Members of Congress.

21 **Hunter Campaign Committee**

22 6. On April 1, 2007, Defendant DUNCAN HUNTER established the Duncan D.
23 Hunter for Congress campaign committee (the "Campaign") to fund a campaign to seek the
24 congressional seat held by his father. At all times relevant herein, DUNCAN HUNTER
25 exercised authority and control over the hiring of staff for his Campaign as well as for the
26 expenditure of funds on its behalf, including through Campaign debit cards, credit cards,
27 and reimbursements for funds expended on behalf of the Campaign.

1 12. Defendant MARGARET HUNTER married Defendant DUNCAN HUNTER
2 in 1998. According to the Campaign's published spending reports, MARGARET
3 HUNTER served as a campaign consultant on DUNCAN HUNTER's congressional
4 campaigns. Between 2010 and 2017, the Committee reported paying MARGARET
5 HUNTER \$116,000 for "management services," "consulting," and "salary." During this
6 time, DUNCAN HUNTER also gave MARGARET HUNTER access to Campaign funds
7 through Campaign debit cards, credit cards, and reimbursements for funds expended on
8 behalf of the Campaign.

9 **Other Individuals**

10 13. Between 2010 and 2017, DUNCAN HUNTER and MARGARET HUNTER
11 (referred to collectively as "the HUNTERS") had personal relationships with the following
12 individuals:

13 1) "Individual 1A" and his wife "Individual 1B" were close friends with
14 both DUNCAN HUNTER and MARGARET HUNTER. They lived in Southern California.
15 In addition to socializing together as couples, DUNCAN HUNTER played golf regularly
16 with Individual 1A.

17 2) "Individual 2A" and his wife "Individual 2B" lived in the Washington,
18 D.C. area and became close friends with the HUNTERS in 2013. DUNCAN HUNTER
19 regularly socialized with Individuals 2A and 2B at their home, at other locations around
20 Washington D.C., in California, and on occasional trips out of town (including to visit the
21 HUNTERS in San Diego).

22 3) "Individual 3A" became friends with DUNCAN HUNTER in around
23 2008. He lived with his wife "Individual 3B" in the Southeast. Individuals 3A and 3B
24 vacationed with the HUNTERS in 2011.

25 4) "Individual 4A" lived in the San Diego area and was a longtime friend
26 of DUNCAN HUNTER. In addition to playing golf together, Individual 4A and DUNCAN
27 HUNTER socialized as couples with MARGARET HUNTER and Individual 4A's wife,
28 "Individual 4B."

1 5) “Individual 5” was a friend of DUNCAN HUNTER’s from childhood.
2 He lived in the Washington, D.C. area and socialized with DUNCAN HUNTER at
3 Individual 5’s home and at other locations around Washington, D.C.

4 6) “Individual 6” became friends with DUNCAN HUNTER in 2016.
5 Although he did not live in the Washington, D.C. area, he visited occasionally and would
6 socialize with DUNCAN HUNTER and their mutual friends in Washington D.C. They also
7 vacationed together at Individual 6’s home in the Northeast, in California, and elsewhere.

8 7) “Individual 7” lived in the San Diego area and became close friends with
9 MARGARET HUNTER in around 2015. She and MARGARET HUNTER socialized
10 together in the San Diego area and occasionally on family trips out of town.

11 8) “Individual 8” was a childhood friend of DUNCAN HUNTER’s brother.
12 He lived in the Washington, D.C. area.

13 9) “Individual 9” lived in the San Diego area and was a close family friend
14 of DUNCAN HUNTER and DUNCAN HUNTER’s father. In addition to working for the
15 Congressional Office, Individual 9 socialized with DUNCAN HUNTER and his family
16 regularly, often over golf.

17 10) “Individual 10” met DUNCAN HUNTER in around 2002 and they
18 remained friends for many years. Although Individual 10 did not live in the San Diego area,
19 he visited occasionally and would socialize with DUNCAN HUNTER over golf.

20 11) “Individual 11” lived in the San Diego area and was friends with
21 DUNCAN HUNTER. Among other things, they played golf together on occasion.

22 12) “Individual 12” lived in the San Diego area and was friends with
23 DUNCAN HUNTER. They played golf occasionally with mutual friends, including
24 Individual 1A. Later, Individual 12 began working with DUNCAN HUNTER.

25 13) “Individual 13” lived in the San Diego area. He became friends with
26 DUNCAN HUNTER and they played golf together on occasion.

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1 **Count 1: Conspiracy**

2 (18 USC § 371)

3 18. Paragraphs 1 through 17 of this Indictment are realleged and incorporated
4 herein by reference.

5 19. Beginning as early as December 2009 and continuing up to and including at
6 least the end of 2016, within the Southern District of California and elsewhere, Defendants
7 DUNCAN D. HUNTER and MARGARET E. HUNTER knowingly conspired with each
8 other to commit offenses against the United States, to wit:

9 1) To knowingly and willfully convert Campaign funds to personal use by
10 using them to fulfill personal commitments, obligations, and expenses that would have
11 existed irrespective of DUNCAN HUNTER's election campaign and duties as a federal
12 officeholder, in amounts of \$25,000 and more in a calendar year, in violation of Title 52,
13 United States Code, Section 30109(d) and 30114(b);

14 2) To knowingly and with intent to defraud devise and execute a material
15 scheme to defraud the Campaign, and to obtain money and property, by means of materially
16 false and fraudulent pretenses, representations and promises, and by intentional
17 concealment of material facts, and to cause interstate wire transmissions in furtherance
18 thereof, in violation of Title 18, United States Code, Section 1343;

19 3) To knowingly conceal, cover up, falsify, and make a false entry in a
20 record and document – that is, an official FEC filing – with the intent to impede, obstruct,
21 and influence the investigation and proper administration of a matter within the jurisdiction
22 of an agency of the United States – that is, the FEC and the FBI – in violation of Title 18,
23 United States Code, Section 1519; and

24 4) To knowingly and with intent to defraud devise and execute a material
25 scheme to defraud a financial institution, and to obtain any of the money and funds owned
26 by and under the custody and control of a financial institution by means of materially false
27 and fraudulent pretenses, representations and promises, and by intentional concealment of
28 material facts, in violation of Title 18, United States Code, Section 1344.

1 **Goal of the Conspiracy**

2 20. The goal of the conspiracy was for DUNCAN HUNTER and MARGARET
3 HUNTER to enrich themselves, and others at their direction, by converting Campaign funds
4 for their own personal benefit and enjoyment, and for the personal benefit of others with
5 whom the HUNTERS had personal relationships.

6 **Manner and Means of the Conspiracy**

7 21. In furtherance of their conspiracy, and to effect its objects, Defendants
8 DUNCAN HUNTER and MARGARET HUNTER used the following manner and means,
9 among others:

10 1) The HUNTERS illegally converted and stole more than \$250,000 in
11 Campaign funds to purchase goods and services for their personal use and enjoyment.

12 2) DUNCAN HUNTER facilitated the HUNTERS' theft of Campaign
13 funds by directing his Treasurer to obtain a Campaign credit card for MARGARET
14 HUNTER at a time when she had no official role with the Campaign and received no official
15 salary, knowing that she would spend Campaign funds for the HUNTERS' personal benefit.

16 3) DUNCAN HUNTER installed MARGARET HUNTER as his paid
17 Campaign Manager despite the protests of his Treasurer and with full knowledge of her
18 long history of misuse of campaign funds, in part because – as they discussed – the
19 HUNTERS “need[ed] the extra money” that would come from her salary.

20 4) The HUNTERS disregarded rules implemented by the Treasurer to track
21 legitimate expenses (such as not purchasing gas using Campaign funds, withdrawing cash
22 from ATMs, using “petty cash” without keeping a proper record of how it was spent, and
23 failing to provide receipts which listed the names of donors and volunteers with whom
24 MARGARET HUNTER claimed to be spending Campaign funds), and, when pressed by
25 the Treasurer to comply, dismissed the rules as “silly.”

26 5) DUNCAN HUNTER facilitated the HUNTERS' theft of Campaign
27 funds by ignoring his Campaign staff's multiple warnings about MARGARET HUNTER's
28 improper use of Campaign funds, accusing Campaign staff of disloyalty by “trying to create

1 some kind of paper trail on me” when they raised concerns about improper spending, and
2 continually refusing to remove her access to Campaign funds.

3 6) MARGARET HUNTER concealed and disguised the personal nature of
4 many of her campaign expenditures by refusing to allow the Campaign Fundraiser to review
5 her credit card statements and spending.

6 7) The HUNTERS concealed and disguised the personal nature of many of
7 their campaign expenditures by either falsely stating the expenses were “campaign related”
8 or by falsely reporting the item or service purchased when providing information to the
9 Treasurer (by, for example, buying personal clothing items at a golf course so that the
10 purchase could be falsely reported to the Treasurer as “balls for the wounded warriors”).

11 8) MARGARET HUNTER concealed and disguised her family’s use of
12 Campaign funds for personal vacations by reserving hotels and paying other personal
13 vacation expenses through Expedia, with the expectation that Campaign records would not
14 reveal the names or locations of their destinations.

15 9) DUNCAN HUNTER belatedly attempted to arrange supposed
16 Campaign-related meetings during family vacations to conceal and disguise the fact that the
17 HUNTERS were using Campaign funds for personal family vacations.

18 10) The HUNTERS concealed and disguised the personal nature of their
19 family’s purchases of video games using Campaign funds by falsely claiming to a financial
20 institution that the payments were fraudulent charges and then reporting the purchases to
21 the FEC and the public as fraudulent charges.

22 11) The HUNTERS discussed how much money was in their family bank
23 accounts in order to determine when it was necessary to purchase certain goods and services
24 with Campaign funds and to withdraw cash from Campaign accounts (discussing, for
25 example, that they withdrew “petty cash all the time with [the former Treasurer] it was
26 great”).

1 12) The HUNTERS monitored the amount of “cash on hand” that was
2 maintained by the Campaign, and would moderate their theft of Campaign funds when the
3 account was excessively low or depleted.

4 13) DUNCAN HUNTER facilitated the HUNTERS’ theft of Campaign
5 funds by giving MARGARET HUNTER his Campaign credit and debit cards so that she
6 could use them to purchase a wide variety of family groceries, household items, and
7 personal gifts.

8 14) The HUNTERS concealed and disguised the personal nature of many of
9 their Campaign expenditures by attempting to have the Campaign’s name taken off the
10 official Campaign credit cards.

11 15) The HUNTERS illegally used Campaign funds, among other things, to
12 purchase the following:

13 (i) Hotel rooms, airline tickets and upgrades, meals and food, and
14 entertainment expenses for vacations for themselves and their friends and family, including
15 more than \$14,000 for a family Thanksgiving vacation in Italy in November 2015; more
16 than \$6,500 for a family vacation to Hawaii in April 2015; more than \$3,700 for a family
17 vacation to Las Vegas and Boise in July 2015; more than \$2,400 for a Las Vegas couples’
18 vacation in August 2011; and more vacations to destinations such as Lake Tahoe,
19 Pittsburgh, London, and Washington D.C.;

20 (ii) Food and drinks for themselves and their friends and family at various
21 restaurants such as Mister A’s, the Capital Grille, Bellagio-Olives, Spago, Caesars Mesa
22 Grill, Sally’s Fish House & Bar, Blue Point Coastal, Island Prime, Harney Sushi, Lou &
23 Mickey’s, Del Frisco’s Double Eagle Steak House, Jake’s Del Mar, the Studio at the
24 Montage, and Sonoma Restaurant;

25 (iii) Household and other personal items for their family from a wide variety
26 of stores, such as Costco (where they spent more than \$11,300 in Campaign funds), Walmart
27 (where they spent more than \$5,700), Barnes & Noble (where they spent more than \$2,500),
28 Target (where they spent more than \$2,300), Michaels craft store (where they spent more

1 than \$2,200), and other retailers such as Aaron Brothers, Party City, World Market, Crate
2 & Barrel, Pier 1, JC Penny, Sears, and Rite Aid;

3 (iv) Beer, wine, alcohol and groceries for themselves, their family, and
4 friends at various stores, including more than \$9,000 spent at Vons, Albertsons, Haggen,
5 and the Miramar Commissary;

6 (v) Food for themselves and their children at various fast food restaurants,
7 including more than \$3,300 spent at In N Out, Carl's Jr., Jack in the Box, Wendy's,
8 McDonalds, Burger King, Taco Bell, La Salsa, Pizza Hut, Rubio's, Domino's Pizza,
9 Weinerschnitzel, Panda Express, Kentucky Fried Chicken, and Menchie's Frozen Yogurt;

10 (vi) Tobacco, personal items, and various sundries at airports kiosks and
11 convenience stores; and

12 (vii) Airline tickets and hotel rooms totaling more than \$15,000 for, among
13 others, their children, other relatives, family friends, and a family pet.

14 16) The HUNTERS agreed to repay the Campaign for their malversation
15 only when, and if: (i) the Treasurer inquired further or insisted on repayment; (ii) repayment
16 would avoid attention where the personal nature of the purchase was evident from financial
17 records; (iii) the FEC highlighted what appeared to be the "personal use of campaign funds"
18 and warned DUNCAN HUNTER that it might "consider taking further legal action;" or
19 (iv) the news media or DUNCAN HUNTER's constituents requested explanations for
20 expenditures that appeared to be personal on their face.

21 Overt Acts

22 22. In furtherance of the conspiracy and to effect its objects, the following overt
23 acts, among others, were committed on the below listed approximate dates (with all amounts
24 below being approximate) within the Southern District of California and elsewhere:

25 1) In or around late 2009, DUNCAN HUNTER requested that his
26 Treasurer obtain Campaign credit cards for himself and MARGARET HUNTER, to which
27 the Treasurer explained that these credit cards could only be used for campaign-related
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1 expenses, not personal expenses that would exist irrespective of DUNCAN HUNTER's
2 campaign or office.

3 2) On or about January 22 to 25, 2010, in Reno, Nevada, DUNCAN
4 HUNTER spent \$351.04 in Campaign funds at Alamo Rent A Car so that he could drive
5 from Reno, Nevada to Lake Tahoe for a personal ski trip with Individual 14.

6 3) On or about January 25, 2010, in Incline Village, Nevada, DUNCAN
7 HUNTER spent \$1,008.72 in Campaign funds at the Hyatt Regency Lake Tahoe Resort,
8 Spa and Casino for food, drinks, and three nights lodging during a personal ski trip with
9 Individual 14. On this day, the HUNTER family bank account had a negative balance and
10 incurred six separate insufficient funds fees (totaling \$198). Also on this same day,
11 DUNCAN HUNTER withdrew \$20 from his personal bank account, leaving a balance of
12 \$15.02.

13 4) On or about March 22, 2010, in La Mesa, California, MARGARET
14 HUNTER spent \$85.18 in Campaign funds at Barnes & Noble to purchase various
15 children's books and puzzles – one of 22 separate occasions that MARGARET HUNTER
16 spent a total of \$2,569.96 in Campaign funds at Barnes & Noble primarily to purchase items
17 for her family and friends. In order to conceal and disguise the illegal use of Campaign
18 funds for personal expenses, MARGARET HUNTER falsely told the Treasurer that the
19 March 22, 2010 charge was for "booklets on San Diego."

20 5) On or about March 24, 2010, in Alexandria, Virginia, DUNCAN
21 HUNTER spent \$121.34 in Campaign funds at the Birchmere Music Hall for food and beer
22 while attending a concert with Individual 14, Congressman A, and Congressman A's date.

23 6) On or about March 31, 2010, in La Quinta, California, the HUNTERS
24 spent \$181.12 in Campaign funds at the La Quinta Resort to reserve a room for the wedding
25 of their friends, Individuals 1A and 1B.

26 7) In or around March-April 2010, DUNCAN HUNTER met with his
27 Treasurer to discuss concerns that MARGARET HUNTER's use of the Campaign card
28 could be a serious problem. At the meeting, the Treasurer suggested that her credit card be

1 taken away. DUNCAN HUNTER acknowledged that her use of the Campaign card could
2 be a serious problem, but declined to take it away.

3 8) On or about April 2, 2010, DUNCAN HUNTER claimed a \$257.40
4 reimbursement from Campaign funds for driving his car on a 468-mile trip to Virginia
5 Beach with Individual 14, Congressman A, and Congressman A's date despite the fact that
6 they did not use DUNCAN HUNTER's car on the trip.

7 9) On or about April 26, 2010, in El Cajon, California, MARGARET
8 HUNTER spent \$64.72 in Campaign funds at Albertsons – one of 45 occasions between
9 2010 and 2016 that MARGARET HUNTER and DUNCAN HUNTER spent a total of
10 \$6,312.81 in Campaign funds at Albertsons and Haggen Food & Pharmacy primarily to
11 purchase groceries and other household items for the HUNTER family.

12 10) On or about April 28, 2010, MARGARET HUNTER spent \$226.40 in
13 Campaign funds at American Airlines to purchase an airline ticket for her sister.

14 11) On or about May 19, 2010, in Santee, California, MARGARET
15 HUNTER spent \$307.72 in Campaign funds at Target to purchase a tablecloth, three square
16 pillows, a three-piece brush set, a metal tray, four temporary shades, four window panels, a
17 white duck, two Punky Brewster items, a ring pop, and two five-packs of "animals." In
18 order to conceal and disguise this illegal charge, MARGARET HUNTER falsely told the
19 Treasurer that it was for "teacher/parent & supporter events."

20 12) On or about May 20, 2010, in El Cajon, California, MARGARET
21 HUNTER spent \$80 in Campaign funds at Shell Oil – one of 155 different occasions
22 between 2010 and 2016 that MARGARET HUNTER spent a total of \$8,181.57 in
23 Campaign funds at various gas stations in the San Diego area after she was informed by the
24 Treasurer that it was impermissible to charge gas directly to the Campaign.

25 13) On or about June 24, 2010, in Alexandria, Virginia, DUNCAN
26 HUNTER spent \$41.75 in Campaign funds at 7-Eleven to purchase personal items while
27 also withdrawing \$20 in cash from his savings account using an ATM at the 7-Eleven,
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1 leaving an account balance of \$0.06. On this day, the HUNTER family bank account had
2 a negative balance and incurred an insufficient funds fee.

3 14) On or about August 21, 2010, in Alpine, California, DUNCAN
4 HUNTER spent \$32.31 in Campaign funds at Albertsons to purchase family groceries and
5 personal items, including milk, apples, beer, chewing tobacco, and a pack of cigarettes.

6 15) On or about August 28, 2010, in San Diego, California, DUNCAN
7 HUNTER spent \$41.04 in Campaign funds to buy a video game at the Apple Store on the
8 same day he used Campaign funds to purchase a \$1,199 iMac computer.

9 16) On or about September 13, 2010, in San Diego, California, DUNCAN
10 HUNTER spent \$164.29 in Campaign funds for, among other things, a round of golf and
11 beer at Riverwalk Golf Club with Individual 1A. When asked by the Treasurer if this
12 expenditure (among several others) was campaign related, DUNCAN HUNTER falsely
13 responded, "Yessir. All good."

14 17) On or about September 27, 2010, in San Diego, California,
15 MARGARET HUNTER spent \$155.96 in Campaign funds at the Miramar Commissary to
16 purchase groceries for the HUNTER family. To conceal and disguise this illegal charge,
17 MARGARET HUNTER falsely informed the Treasurer that it was for "misc. items and
18 docor [sic] for school-related and campaign events."

19 18) In or around November 2010, DUNCAN HUNTER discussed with the
20 Treasurer and the Campaign Fundraiser the idea of hiring MARGARET HUNTER as the
21 paid Campaign Manager, but relented when the Treasurer made it clear that this would not
22 be a good idea.

23 19) On or about November 6, 2010, in San Diego, California, MARGARET
24 HUNTER spent \$704 in Campaign funds at the Old Globe Theatre for seven adult and five
25 children's tickets to the play, "*How the Grinch Stole Christmas*." MARGARET HUNTER
26 later falsely described this purchase to the Treasurer as being for "holiday gift certificates."

27 20) On or about November 18, 2010, DUNCAN HUNTER discussed with
28 the Treasurer questionable charges by MARGARET HUNTER that had been of continuing

1 concern to the Treasurer; most recently, the Old Globe tickets. In order to lower suspicions
2 and reduce the risk of detection, DUNCAN HUNTER decided that they would use personal
3 funds to repay the Campaign for MARGARET HUNTER's purchase.

4 21) On or about November 19 to 22, 2010, in Pittsburgh, Pennsylvania and
5 elsewhere, the HUNTERS spent \$1,912.66 in Campaign funds as a birthday gift for a family
6 member to attend a Pittsburgh Steelers game at Heinz Field at the invitation of Congressman
7 B. To conceal and disguise these illegal personal charges, the HUNTERS failed to inform
8 the Treasurer that they were for a football game or that a family member was one of the
9 attendees. When asked if the charges were campaign related, DUNCAN HUNTER falsely
10 confirmed, "Yessir."

11 22) On or about December 10, 2010, in response to an email from his
12 Treasurer questioning a variety of charges and noting that Campaign money could not be
13 used "for a leisure outing at which the discussion occasionally focuses on the campaign,"
14 DUNCAN HUNTER asked the Treasurer if he was "trying to create some kind of paper
15 trail" on him.

16 23) On or about December 22, 2010, after the Treasurer again warned the
17 HUNTERS that "campaign funds may not be used for a leisure outing" even if campaign
18 business is occasionally discussed, MARGARET HUNTER told the Treasurer that she
19 refused to provide the names of individuals she allegedly took out for meals with Campaign
20 funds because "that's silly."

21 24) In or around late December 2010, after the Treasurer stated that he might
22 resign, DUNCAN HUNTER agreed to ensure that MARGARET HUNTER would not use
23 her Campaign credit card and he would get her to put it away in a safe place.

24 25) On or about February 5, 2011, in San Diego and El Cajon, California,
25 on a date DUNCAN HUNTER's calendar indicated a 7:00 am appointment for "Personal -
26 Cottonwood," DUNCAN HUNTER spent \$169.24 in Campaign funds for golf at
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1 Cottonwood Golf Club at 6:51 am, and for a later meal at Harney Sushi, both with
2 Individual 1A.

3 26) On or about March 15, 2011, DUNCAN HUNTER, when asked by his
4 Treasurer to confirm that his credit card charges for the prior month were all Campaign-
5 related, responded, "Of course they are all campaign. Why else would I charge them to the
6 campaign card."

7 27) On or about May 17, 2011, the HUNTERS spent \$103.57 in Campaign
8 funds to reserve a room at the Treasure Island hotel in Las Vegas, Nevada, for an upcoming
9 vacation with their friends, Individuals 3A and 3B.

10 28) On or about May 26, 2011, MARGARET HUNTER requested that the
11 Treasurer order her a new Campaign credit card.

12 29) Beginning in about June 2011 and continuing throughout the year, in
13 San Diego and elsewhere, after being informed by his Treasurer that MARGARET
14 HUNTER was making problematic purchases (including at grocery stores and various retail
15 stores), DUNCAN HUNTER allowed her to continue to use the Campaign card.

16 30) On or about June 9, 2011, in El Cajon, California, DUNCAN HUNTER
17 spent \$164.63 in Campaign funds at Best Buy to purchase an iPod Nano.

18 31) On or about June 11, 2011, in San Diego, California, DUNCAN
19 HUNTER spent \$110.63 in Campaign funds at the Riverwalk Golf Club to buy beer and
20 play golf with friends, including Individual 1A.

21 32) On or about June 17, 2011, in La Mesa, California, DUNCAN HUNTER
22 spent \$142.36 in Campaign funds at the Men's Wearhouse to "re-cut" two pairs of pants.
23 When this charge was uncovered by the Treasurer, DUNCAN HUNTER falsely explained
24 the charge: "Lol. Men's warehouse was a possible semi-embarrassment that I had to let ride.
25 I used the wrong card, then didn't want to explain the forced refund"

26 33) On or about June 21, 2011, in Washington, D.C., DUNCAN HUNTER
27 spent \$162.02 in Campaign funds for a personal stay at the Liaison Capitol Hill hotel with
28 Individual 14.

1 34) On or about June 29, 2011, in Woodbridge, Virginia, DUNCAN
2 HUNTER spent \$253.56 in Campaign funds for greens fees and beer at Old Hickory Golf
3 Club to play golf with Individual 14 and purchase clothing.

4 35) On or about July 3, 2011, in El Cajon, California, DUNCAN HUNTER
5 spent \$90 in Campaign funds to play golf at Cottonwood Golf Club with Individual 1A –
6 one of 24 occasions between 2010 and 2016 that DUNCAN HUNTER spent a total of
7 \$881.60 in Campaign funds at Cottonwood Golf Club for greens fees, food, and drinks
8 while golfing with family (including his father and minor children) and friends (including
9 Individual 1A and Individual 9).

10 36) On or about July 3, 2011, in San Diego, California, DUNCAN
11 HUNTER spent \$148.90 in Campaign funds at Sally's Fish House and Bar to pay his half
12 of the bill during a personal dinner with Individuals 1A and 1B and MARGARET
13 HUNTER.

14 37) On or about July 13, 2011, in Washington, D.C., MARGARET
15 HUNTER spent \$65.19 in Campaign funds at the International Spy Museum for gifts for
16 the HUNTER family.

17 38) On or about July 24, 2011, in Del Mar, California, the HUNTERS spent
18 \$102 in Campaign funds to purchase tickets to the Del Mar Racetrack for the following
19 month for a day at the races with Individuals 1A and 1B.

20 39) On or about August 6 to 10, 2011, in Las Vegas, Nevada and elsewhere,
21 the HUNTERS spent \$2,448.27 in Campaign funds on a personal vacation with Individuals
22 3A and 3B. During this vacation, the HUNTER family bank account began incurring
23 insufficient funds fees until a check from DUNCAN HUNTER's parents was deposited into
24 the account on August 10. To conceal and disguise these illegal charges, DUNCAN
25 HUNTER falsely informed his Treasurer that all the charges related to this trip were
26 "campaign related." Similarly, MARGARET HUNTER misled the Treasurer by describing
27 that the Las Vegas charges were for "couple meals."
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1 40) On or about August 18, 2011, the HUNTERS spent \$1,419 in Campaign
2 funds at Southwest Airlines to purchase five roundtrip tickets to Boise, Idaho for a family
3 vacation. To conceal and disguise these illegal charges, DUNCAN HUNTER falsely
4 informed his Treasurer that these charges were "campaign related."

5 41) On or about August 20, 2011; in Del Mar, California, DUNCAN
6 HUNTER spent \$113.73 in Campaign funds at Jake's Del Mar to split a \$227.45 tab during
7 a personal dinner with Individuals 1A and 1B. To conceal and disguise this illegal charge,
8 DUNCAN HUNTER falsely informed his Treasurer that it was "campaign related."

9 42) On or about August 21, 2011, in Del Mar, California, DUNCAN
10 HUNTER spent \$156.22 in Campaign funds at Del Mar Racetrack to purchase food and
11 drinks during a day at the races with Individuals 1A and 1B. To conceal and disguise this
12 illegal charge, DUNCAN HUNTER falsely informed his Treasurer that it was "campaign
13 related."

14 43) On or about August 28, 2011, in Coronado, California, the HUNTERS
15 spent \$511.03 in Campaign funds at the Hotel del Coronado for a family celebration. To
16 conceal and disguise these personal charges, DUNCAN HUNTER falsely informed his
17 Treasurer that all the charges were "campaign related."

18 44) On or about September 5, 2011, in El Cajon, California, DUNCAN
19 HUNTER spent \$399.06 in Campaign funds at Best Buy to purchase a Nikon CoolPix
20 S9100 digital camera, plus battery and SD card, which he used to photograph his upcoming
21 family vacation to Idaho and other events. To conceal and disguise this illegal transaction,
22 he falsely informed his Treasurer that the charge was for ink, paper, and computer software.

23 45) On or about September 12, 2011, despite opposition by his Treasurer
24 and individuals in his Washington, D.C. office, DUNCAN HUNTER hired MARGARET
25 HUNTER as his "Campaign Manager" at a salary of \$2,000 per month.

26 46) On or about September 16 to 19, 2011, in Boise, Idaho and elsewhere,
27 the HUNTERS spent an additional \$640.05 in Campaign funds for a family vacation
28 centered on a family member's participation in a dance competition.

1 47) On or about October 22 to 24, 2011, in Los Angeles, California and
2 elsewhere, the HUNTERS spent \$432.81 in Campaign funds for a family vacation centered
3 on a family member's participation in a dance competition.

4 48) On or about October 24, 2011, in San Diego, California, DUNCAN
5 HUNTER spent \$344.56 in Campaign funds at Enterprise Rent-A-Car to rent a vehicle so
6 that he could drive from Los Angeles International Airport ("LAX") for a family member's
7 dance competition in Orange County.

8 49) On or about October 28, 2011, in and around Washington, D.C., the
9 HUNTERS spent \$3,754.73 in Campaign funds for a family vacation in which the
10 HUNTERS ran the Marine Corps Marathon (10K course) and took their family to a fall
11 festival. DUNCAN HUNTER falsely informed his Treasurer that the charges associated
12 with this trip were "all campaign" and MARGARET HUNTER added that they were
13 "during a trip to dc. Meals mostly."

14 50) On November 16, 2011, in La Mesa, California, MARGARET
15 HUNTER spent \$25 in Campaign funds at Vons to purchase prescription medication. To
16 conceal and disguise the illegal transaction, she falsely told the Treasurer that she "[b]ought
17 Target gift card donation to church family." She later changed her story and falsely claimed
18 the charge was for "Applebee's Restaurant – Republican Women."

19 51) On or about November 19, 2011, in Anaheim, California and elsewhere,
20 the HUNTERS spent \$168.89 in Campaign funds to watch a family member compete at a
21 dance competition.

22 52) On or about December 17, 2011, after the Treasurer reminded
23 DUNCAN HUNTER and MARGARET HUNTER that it was impermissible "to mix
24 personal and Campaign expenses on the Amex card" – specifically referencing charges
25 made at Barnes & Noble, Michaels craft store, the Disney Store, Vons, Walmart, and World
26 Market – the HUNTERS failed to reclassify or reimburse these personal expenses.

27 53) On or about January 11, 2012, in La Mesa, California, MARGARET
28 HUNTER spent \$98.05 in Campaign funds at Costco – one of 29 different dates between

1 2010 and 2016 that MARGARET HUNTER and DUNCAN HUNTER spent a total of
2 \$11,375.46 in Campaign funds at Costco primarily to purchase personal items for the
3 HUNTER family, including groceries, household items, toiletries, cosmetics, medicine and
4 vitamins, clothing, pet supplies, and video games. To conceal and disguise the illegal
5 January 11, 2012 charge, MARGARET HUNTER falsely told the Treasurer that the
6 January 11 purchase was for "gift basket items for basket donation - Temecula chamber
7 gala auction."

8 54) On or about January 12, 2012, in Alpine, California, MARGARET
9 HUNTER spent \$918.60 in Campaign funds at Expedia to fly her sister and two other family
10 members to a funeral in Tucson. To conceal and disguise the illegal charges, she falsely
11 told the Treasurer that they were for a "flight to Baltimore for NRCC winter meeting."

12 55) On or about January 22, 2012, MARGARET HUNTER spent \$504.20
13 in Campaign funds to buy a roundtrip United Airlines ticket for her mother from San Diego
14 to Chicago. To conceal and disguise the illegal charge, she falsely told the Treasurer that
15 they were for a "flight to Baltimore for NRCC winter meeting."

16 56) On or about February 8 and 16, 2012, the HUNTERS spent \$306.80 in
17 Campaign funds at United Airlines for additional charges related to a ticket for
18 MARGARET HUNTER's mother to fly from San Diego to Chicago. In response to whether
19 the charge was campaign related, DUNCAN HUNTER told his Treasurer: "Yes sir."

20 57) On or about March 16, 2012, the HUNTERS spent \$36.96 in Campaign
21 funds at United Airlines for additional charges related to a ticket for MARGARET
22 HUNTER's mother to fly from Warsaw, Poland to Chicago. In response to whether the
23 charges were campaign related, DUNCAN HUNTER told his Treasurer: "Yes they are."

24 58) On or about March 17, 2012, in San Diego, California, the HUNTERS
25 spent \$235.72 in Campaign funds at Blue Point Coastal and the Hyatt Andaz for food and
26 drinks during a St. Patrick's Day celebration with Individuals 1A and 1B.

27 59) On or about May 6 to 12, 2012, in Washington, D.C. and elsewhere, the
28 HUNTERS spent approximately \$10,000 in Campaign funds to pay for a family vacation

1 (which included a nephew), during which time MARGARET HUNTER attended a "First
2 Ladies Lunch" at the Washington Hilton. To conceal and disguise the illegal charges,
3 DUNCAN HUNTER told his Treasurer that the charges were "[a]ll campaign related."

4 60) On or about May 12, 2012, in El Cajon, California, MARGARET
5 HUNTER spent \$323.62 in Campaign funds at Party City and Vons to purchase supplies
6 for a family member's birthday party.

7 61) In or around June 2012, DUNCAN HUNTER continued to authorize
8 MARGARET HUNTER's expenditure of Campaign funds, even after being informed by
9 his Chief of Staff of concerns about MARGARET HUNTER's spending on gift cards that
10 she claimed were for charitable donations, restaurants, and supermarkets.

11 62) On or about June 9, 2012, the HUNTERS spent \$1,276.80 in Campaign
12 funds at United Airlines to fly MARGARET HUNTER's sister and two other family
13 members from San Diego to New Orleans. In response to whether the charges were
14 campaign related, DUNCAN HUNTER falsely responded, "All campaign related."

15 63) On or about June 9, 2012, in San Diego, California, DUNCAN
16 HUNTER spent \$369.08 in Campaign funds to play golf at Riverwalk Golf Club with
17 Individual 1A, followed by dinner at Asti Ristoranti with MARGARET HUNTER and
18 Individuals 1A and 1B. To conceal and disguise this illegal activity, DUNCAN HUNTER
19 falsely confirmed to his Treasurer that the charges were all "campaign related."

20 64) On or about June 24, 2012, in La Mesa, California, MARGARET
21 HUNTER spent \$46.98 in Campaign funds at Safeway to purchase family groceries and
22 alcohol. To conceal and disguise the illegal charge, MARGARET HUNTER falsely
23 described it to the Treasurer as being for "flowers."

24 65) On or about July 10, 2012, in San Diego, California, MARGARET
25 HUNTER spent \$259.31 in Campaign funds to take her family to the San Diego Natural
26 History Museum and the Prado restaurant in Balboa Park. To conceal and disguise the
27 illegal charges, she falsely told the Treasurer that they were for gift basket items and a meal
28 with supporters.

1 66) On or about July 17, 2012, in La Mesa, California, MARGARET
2 HUNTER spent \$105.28 in Campaign funds at Olive Garden to purchase one adult and two
3 kids' meals. To conceal and disguise the illegal transaction, she falsely told the Treasurer
4 that the charge was for a "meal with support[ers]."

5 67) On or about July 21, 2012, in Del Mar, California, DUNCAN HUNTER
6 spent \$59.26 in Campaign funds at the Del Mar Country Club to purchase a pair of Under
7 Armor shorts. At this time, the HUNTERS had a negative balance in their family bank
8 account and had incurred six insufficient funds fees, one overdraft fee, and one returned
9 item fee (totaling \$253) during the prior six days.

10 68) On or about July 28 to 30, 2012, in Irvine, California and elsewhere, the
11 HUNTERS spent more than \$445 in Campaign funds to watch a family member's dance
12 competition. To conceal and disguise these illegal charges, MARGART HUNTER misled
13 the Treasurer by claiming that they were for a "Newport [Campaign] Event."

14 69) On or about August 12, 2012, in Del Mar, California, DUNCAN
15 HUNTER spent \$310.45 in Campaign funds at the Del Mar Racetrack to purchase food and
16 drinks while attending the races with Individuals 1A and 1B. Although he acknowledged
17 to his Treasurer that the entrance tickets should be paid with personal funds, DUNCAN
18 HUNTER falsely asserted that the food and drink charges were all "campaign related."

19 70) On or about August 29, 2012, in El Cajon, California, MARGARET
20 HUNTER spent \$92.13 in Campaign funds at Vons to purchase family groceries and
21 supplies for a family member's birthday party – one of 29 different dates between 2010 and
22 2015 that MARGARET HUNTER and DUNCAN HUNTER spent a total of \$2,928.06 in
23 Campaign funds at Vons primarily to purchase groceries and other household items for the
24 HUNTER family. To conceal the illegal August 29, 2012 purchase, MARGARET
25 HUNTER misled the Treasurer by saying only that it was for a "[Campaign] get-together
26 [in their] home."

27 71) On or about October 10, 2012, MARGARET HUNTER spent \$541.60
28 in Campaign funds at United Airlines to purchase a ticket for a family member's friend to

1 travel to Washington, D.C., along with the HUNTER family. DUNCAN HUNTER falsely
2 confirmed to his Treasurer that the charges were campaign related.

3 72) On or about October 21, 2012, in El Cajon, California, MARGARET
4 HUNTER spent \$28.88 in Campaign funds at Panda Express to purchase food – one of 200
5 separate occasions between 2010 and 2016 that MARGARET HUNTER spent a total of
6 \$5,068.34 in Campaign funds at fast food restaurants such as In N Out, Carl's Jr., Jack in
7 the Box, Wendy's, McDonalds, Burger King, Taco Bell, La Salsa, Pizza Hut, Domino's
8 Pizza, Weinerschnitzel, Kentucky Fried Chicken, and Menchie's Frozen Yogurt, without
9 documenting a legitimate campaign purpose. To conceal and disguise the illegal
10 October 21, 2012 charge, she told the Treasurer that it was for a "meal on campaign go."

11 73) On or about October 30, 2012, following an article in the *San Diego*
12 *Reader* publicizing MARGARET HUNTER's salary and various expense reimbursements,
13 DUNCAN HUNTER relieved her of her formal duties with the Campaign. Although the
14 Campaign was in dire financial condition, and had just canceled a pre-election mailer due
15 to insufficient funds, DUNCAN HUNTER continued to pay MARGARET HUNTER a
16 salary from Campaign funds and allowed her to keep her Campaign credit card.

17 74) On or about November 23, 2012, in Lakeside, California, DUNCAN
18 HUNTER spent \$560 in Campaign funds to play golf at the Barona Creek Golf Resort with
19 his father, Individual 10, and Individual 10's father. At this time, the HUNTER family bank
20 account had a negative balance and had incurred three insufficient funds fees and one
21 overdraft fee two days previously (totaling \$117).

22 75) On or about December 4, 2012, in San Diego, California, MARGARET
23 HUNTER spent \$145.46 in Campaign funds at Bloomingdale's to purchase cosmetics for
24 personal use.

25 76) On or about December 19, 2012, after reassuring the Chief of Staff in
26 the morning that she would rein in her campaign spending and vowing that "[a]s of now, I
27 am done with any donation item purchases related to the campaign," MARGARET
28 HUNTER spent Campaign funds at World Market (\$155.66, allegedly for "holiday basket

1 gift items”) and Barnes & Noble (\$359.57, allegedly for “items for multiple toy
2 drives/childrens hospital book drive”).

3 77) On or about December 22, 2012, in La Mesa, California, MARGARET
4 HUNTER spent \$233.34 in Campaign funds at Walmart – one of 48 different dates between
5 2010 and 2016 that MARGARET HUNTER spent a total of \$5,789.30 in Campaign funds
6 at Walmart primarily to purchase personal items for the HUNTER family, including
7 groceries, household items, gifts, cosmetics, pet supplies, and games.

8 78) On or about December 31, 2012, after being advised that the Campaign
9 could not pay its outstanding bills, DUNCAN HUNTER told his Treasurer that he would
10 raise \$11,000 to \$15,000 from Campaign donors by mid-January in order to make up for
11 the shortfall. He also stopped paying MARGARET HUNTER’s salary and took away the
12 Campaign credit card.

13 79) In or around February 2013, in Washington, D.C., DUNCAN HUNTER
14 hired a new Treasurer located in Virginia. Shortly thereafter, the new Treasurer obtained a
15 debit card for DUNCAN HUNTER’s Campaign use.

16 80) On or about April 20, 2013, in San Diego, California, DUNCAN
17 HUNTER spent \$219.93 in Campaign funds at Island Prime during a personal dinner with
18 MARGARET HUNTER and Individuals 1A and 1B. To disguise the personal nature of
19 this illegal charge, DUNCAN HUNTER misled his Chief of Staff by describing his friend
20 Individual 1A as just a “State Farm Insurance guy” who did business with churches.

21 81) On or about June 7, 2013, in Owings Mills, Maryland, DUNCAN
22 HUNTER spent \$302.10 in Campaign funds at Caves Valley Golf Club to purchase a jacket
23 for his personal use.

24 82) On or about June 17, 2013, in El Cajon, California, DUNCAN
25 HUNTER spent \$163.53 in Campaign funds at Best Buy to purchase a pair of sports
26 headphones for his personal use. At this time, the HUNTER family bank account had a
27 negative balance and incurred three insufficient funds fees (totaling \$102).

28

1 83) In or around July 2013, in Washington, D.C., DUNCAN HUNTER
2 spent a total of \$36 in Campaign funds for Uber rides to the residence of Individual 15.

3 84) On or about July 21, 2013, in San Diego, California, DUNCAN
4 HUNTER spent \$138.19 in Campaign funds at the Apple Store to purchase iPhone
5 accessories for his personal use, including a camera lens for his iPhone. To conceal and
6 disguise this personal charge, he told his Chief of Staff that it was a "campaign receipt."

7 85) On or about November 16, 2013, in La Mesa, California, DUNCAN
8 HUNTER spent \$100.69 in Campaign funds at Casa De Pico to take the HUNTER family
9 out to dinner with Individuals 1A and 1B, before they all attended a high school football
10 game. To conceal and disguise the illegal charge, DUNCAN HUNTER misled his Chief of
11 Staff by telling her that the meal was a dinner with "volunteers/contributors."

12 86) On or about November 26, 2013, in San Diego, California, DUNCAN
13 HUNTER spent \$313.05 in Campaign funds at the Apple Store to purchase iPhone camera
14 lenses and other accessories for his personal use.

15 87) On or about December 12, 2013, in Washington, D.C., DUNCAN
16 HUNTER spent \$238 in Campaign funds at Matchbox Vintage Pizza Bistro ("Matchbox")
17 to watch a San Diego Chargers football game with Individual 2A and Congressman C. On
18 that day, the HUNTER family bank account balance was \$28.16 and MARGARET
19 HUNTER forwarded a low balance alert to DUNCAN HUNTER and urged him to only
20 "take out the \$20!"

21 88) On or about December 13, 2013, in Reston, Virginia, DUNCAN
22 HUNTER spent \$63.57 in Campaign funds at Best Buy to purchase a pair of gloves and a
23 car charger for an upcoming trip to Pittsburgh.

24 89) On or about December 13 to 16, 2013, in Pittsburgh, Pennsylvania and
25 elsewhere, the HUNTERS spent \$2,217.34 in Campaign funds to pay for a family trip to a
26 Pittsburgh Steelers football game at Heinz Field (at the invitation of Congressman B).
27 Although DUNCAN HUNTER arranged to have a business meeting in Pittsburgh on
28

1 Monday, he failed to inform his Chief of Staff or his Treasurer that they were using
2 Campaign funds primarily for a family vacation.

3 90) On or about December 30, 2013, after considering the benefits of
4 bringing more money to the HUNTERS' household on a monthly basis, DUNCAN
5 HUNTER hired MARGARET HUNTER back as Campaign Manager at a salary of \$2,500
6 per month (although the Campaign ended up actually paying her \$3,000 per month).

7 91) On or about December 31, 2013, MARGARET HUNTER, referring to
8 the new salary she was about to receive, texted DUNCAN HUNTER: "[Y]ou need the extra
9 money as much as I do[.]"

10 92) On or about February 10, 2014, in Washington, D.C., DUNCAN
11 HUNTER spent a total of \$64 in Campaign funds for drinks at Hill Country BBQ and an
12 Uber ride while socializing with Individual 15.

13 93) On or about February 14, 2014, in La Jolla, California, DUNCAN
14 HUNTER spent \$99 in Campaign funds at Torrey Pines Golf Course to purchase golf shoes.

15 94) On or about March 18, 2014, in La Quinta, California, the HUNTERS
16 spent \$1,386.48 in Campaign funds for two rooms at the La Quinta Resort & Club for a
17 personal vacation with Individuals 1A and 1B, in connection with an event taking place at
18 the hotel. To conceal and disguise that they were paying for a second hotel room for their
19 friends, MARGARET HUNTER misled DUNCAN HUNTER's Chief of Staff by claiming
20 that the hotel "had issue [sic] with one room and ended up switching."

21 95) On or about May 20, 2014, MARGARET HUNTER spent \$261.12 in
22 Campaign funds at Cox Communications to pay a portion of the overdue balance on their
23 home cable subscription, one of ten payments totaling \$3,166.06 that MARGARET
24 HUNTER made to Cox using Campaign funds to pay cable bills. To conceal and disguise
25 her illegal activity, MARGARET HUNTER told the Chief of Staff that the May 20, 2014
26 charge was a "one time set up" fee for an "internet printer and fax line" (the nine additional
27 payments being made only after the Chief of Staff retired at the end of 2014).

28

1 96) On or about June 28, 2014, in Laguna Beach, California, the HUNTERS
2 spent \$1,163.68 in Campaign funds at the Montage Resort for food and drinks with
3 Individuals 1A and 1B, which the HUNTERS promised would be “our treat” because their
4 lodging would be provided free by the hotel. At that time, the HUNTER family bank
5 account had a negative balance and, during the preceding week, had incurred four separate
6 insufficient funds fees, four separate returned item fees, and one overdraft fee (totaling
7 \$287).

8 97) On or about July 8, 2014, in Washington, D.C., DUNCAN HUNTER
9 declined Individual 2A’s offer to pay for HUNTER’s Uber ride to his house, which
10 Individual 2A had extended in order to help HUNTER “keep some of those [personal Uber
11 charges] off of your [Campaign] account.” Instead, that same day, DUNCAN HUNTER
12 spent \$7.28 in Campaign funds for an Uber ride to Individual 2A’s house – one of
13 approximately 43 different dates between 2013 and 2016 that DUNCAN HUNTER spent a
14 total of \$990.60 in Campaign funds on Uber rides to socialize with his friends – including
15 Individual 2A, Individual 2B, Individual 5, and Individual 15 – and for other personal
16 outings.

17 98) On or about July 9, 2014, the HUNTERS spent \$250 in Campaign funds
18 at United Airlines to fly a family pet to Washington, D.C. for a family vacation.

19 99) On or about July 13, 2014, in Farmington, Pennsylvania, DUNCAN
20 HUNTER spent \$1,067 in Campaign funds, including \$399 for a zipline ride, at the
21 Nemacolin Woodlands Resort for family activities that were not part of a scheduled work
22 event held at the hotel.

23 100) On or about July 17, 2014, in San Diego, California, MARGARET
24 HUNTER obtained \$201.38 from the Campaign as reimbursement for the HUNTERS’
25 share of a personal meal on July 4th with Individuals 1A and 1B at Sally’s Fish House and
26 Bar to celebrate Independence Day. To obtain this reimbursement, MARGARET
27 HUNTER misleadingly described the expense as being simply for “meals.”
28

1 101) On or about July 17, 2014, in San Diego, California, MARGARET
2 HUNTER spent \$187.60 in Campaign funds to purchase airline tickets for a nephew to
3 travel roundtrip from New Orleans to San Diego.

4 102) On or about October 22, 2014, in San Diego, California, DUNCAN
5 HUNTER spent \$204.34 in Campaign funds for two greens fees, food, and drinks at the
6 Rancho Bernardo Golf Resort, during a personal golf outing with friends, including
7 Individual 1A. To conceal and disguise his illegal activity, he misled his Chief of Staff by
8 describing his regular golf outing with Individual 1A as “a Christian thing” with a supporter.

9 103) On or about November 5, 2014, in El Cajon, California, DUNCAN
10 HUNTER spent \$138 in Campaign funds to play golf at the Sycuan Golf Resort with a
11 minor family member, Individual 1A, and Individual 9, although DUNCAN HUNTER told
12 Individual 1A he had “nada, zip, zero” scheduled on his official calendar.

13 104) On or about November 12, 2014, MARGARET HUNTER spent \$211
14 in Campaign funds at United Airlines for a variety of charges related to personal travel for
15 her mother and her mother’s boyfriend. To conceal and disguise these illegal charges,
16 MARGARET HUNTER falsely told the Chief of Staff in an email (copying to DUNCAN
17 HUNTER) that they were “for campaign travel plane changes.”

18 105) On or about November 23, 2014, in Alpine, California, DUNCAN
19 HUNTER spent \$215.40 in Campaign funds at Albertsons to purchase family groceries and
20 food and drinks for a family member’s youth football team’s end-of-the-season party. To
21 conceal and disguise their illegal activity, MARGARET HUNTER misled the Chief of Staff
22 (copying DUNCAN HUNTER) by saying that the transaction was for an “AYF event
23 contribution,” and concealing the fact that the expense actually paid for a private party for
24 the family member’s football team.

25 106) On or about November 28, 2014, in Coronado, California, DUNCAN
26 HUNTER spent \$200.24 in Campaign funds at the Hotel del Coronado and Tent City for an
27 evening out with his family.

28

1 107) On or about December 14, 2014, in Alpine, California, DUNCAN
2 HUNTER spent \$411.19 in Campaign funds at Vons to purchase family groceries, including
3 air freshener, butter, chopped spinach, brownie mix, and juice.

4 108) On or about January 7, 2015, MARGARET HUNTER obtained \$800.33
5 in Campaign funds by falsely claiming to the Treasurer that she paid Hyatt hotel charges
6 with her “personal card because [her] camp[aign card] had ran [sic] up daily limit due to
7 airline purchases,” when in reality, she paid the hotel bill using her Campaign debit card
8 and incurred only \$33.05 in incidental hotel charges on her personal card, thereby
9 effectively stealing \$800 from the Campaign.

10 109) On or about January 28, 2015, MARGARET HUNTER spent \$413 in
11 Campaign funds at United Airlines to purchase a ticket for DUNCAN HUNTER to fly to
12 Hawaii for an upcoming family vacation.

13 110) On or about February 15, 2015, MARGARET HUNTER told the
14 Treasurer “[w]e really need to up the 1k daily limit to 4 or 5” on the Campaign debit card,
15 but after learning that the bank would not allow this change, the HUNTERS instructed the
16 Treasurer to instead open a credit card account in addition to their debit card.

17 111) On or about February 17, 2015, MARGARET HUNTER spent \$60.25
18 in Campaign funds at Ki’s School Lunches to pay for school lunches for their family – one
19 of 22 different occasions in 2015 and 2016 that MARGARET HUNTER spent a total of
20 \$1,372.55 in Campaign funds at Ki’s to purchase school lunches.

21 112) On or about March 8, 2015, in San Diego, California, DUNCAN
22 HUNTER spent a total of \$258.95 in Campaign funds at Sally’s Fish House and Bar for
23 food and drinks with MARGARET HUNTER and Individuals 1A and 1B.

24 113) On or about March 16, 2015, in Alpine, California, the HUNTERS spent
25 \$19.99 in Campaign funds at Steam Games to pay for video game charges – one of 82
26 separate occasions in 2015 that the HUNTERS spent a total of \$1,528.68 in Campaign funds
27 at Steam Games on video game charges.

28

1 114) On or about March 18, 2015, by misleading the Treasurer, MARGARET
2 HUNTER requested \$131.76 from the Campaign as reimbursement for a personal night out
3 at Blue Point Coastal (on February 28, 2015) with Individuals 4A and 4B.

4 115) That same day, in San Diego, California, MARGARET HUNTER
5 obtained an additional \$438.48 from the Campaign as reimbursement for a personal night
6 out at Island Prime (on March 7, 2015) with Individuals 1A and 1B and Individual 2A.
7 MARGARET HUNTER requested and obtained reimbursement for the full check despite
8 the fact the HUNTERS' friends had paid for \$366.48 of the total bill. When she requested
9 these reimbursements, the HUNTER family bank account had a negative balance and
10 incurred seven insufficient funds fees and one returned item fee (totaling \$272) during the
11 prior week.

12 116) On or about March 20, 2015, when DUNCAN HUNTER told
13 MARGARET HUNTER that he was planning "to buy my Hawaii shorts" but had run out
14 of money, she counseled him to buy the shorts at a golf pro shop so that they could falsely
15 describe the purchase later as "some [golf] balls for the wounded warriors."

16 117) On or about March 20, 2015, MARGARET HUNTER told DUNCAN
17 HUNTER that he could not access any funds until the next day using his personal credit
18 card. Instead, she counseled him to withdraw up to \$100 in "petty cash" using his "work
19 card." She reminded him, "[W]e used to do petty cash all the time with [the former
20 Treasurer] it was great."

21 118) Later that same day, DUNCAN HUNTER spent \$199.60 in Campaign
22 funds at Albertsons where he bought \$99.60 worth of groceries, including dog food, and
23 received \$100 back in cash.

24 119) On or about April 7, 2015, in Lahaina, Hawaii, the HUNTERS spent
25 \$6,288.74 in Campaign funds at the Aston Kaanapali Shores resort to pay for a family
26 vacation.

27 120) On or about April 8, 2015, DUNCAN HUNTER gave MARGARET
28 HUNTER his new Campaign credit card (in his name) despite her prior and ongoing misuse

1 of campaign funds. DUNCAN HUNTER kept the Campaign debit card, which he used to
2 access Campaign funds when not with MARGARET HUNTER.

3 121) On or about April 20, 2015, MARGARET HUNTER spent \$995.50 in
4 Campaign funds at United Airlines to buy tickets for her mother and her mother's boyfriend
5 to fly to Warsaw, Poland. MARGARET HUNTER falsely told the Treasurer that they were
6 related to Campaign trips to New Orleans and Kentucky.

7 122) On or about May 3, 2015, in San Diego, California, the HUNTERS spent
8 \$869.26 in Campaign funds to pay for dinner and drinks at the Cowboy Star Restaurant &
9 Butcher Shop for a personal meal with the HUNTER family, Individual 1A, and
10 Individual 2A.

11 123) On or about May 10, 2015, in Coronado, California, the HUNTERS
12 spent \$999.68 in Campaign funds at the Hotel del Coronado to purchase tickets to a
13 Mother's Day brunch for their family (including MARGARET HUNTER's mother) and
14 items at the gift shop.

15 124) On or about June 3, 2015, in Washington, D.C., DUNCAN HUNTER
16 spent \$202.70 in Campaign funds at H Street Country Club for a personal dinner with
17 Individual 16, Individuals 2A and 2B, and Congressman C and his date.

18 125) On or about June 10, 2015, in El Cajon, California, MARGARET
19 HUNTER spent \$1,137 in Campaign funds at the Center for Oral & Facial Surgery to pay
20 an outstanding, overdue balance for family dental work.

21 126) On or about June 12, 2015, in Washington, D.C., DUNCAN HUNTER
22 spent \$352.60 in Campaign funds at Matchbox for, in his words, "a nice family evening"
23 with his nephew, Individual 16, and Individuals 2A and 2B.

24 127) On or about June 13, 2015, in Davidsonville, Maryland, DUNCAN
25 HUNTER spent \$87.69 in Campaign funds to play golf at Renditions Golf Course with
26 Individual 2A.

27 128) On or about June 29 to July 6, 2015, in Boise, Idaho, Las Vegas, Nevada,
28 and elsewhere, the HUNTERS spent \$3,724.07 in Campaign funds to pay for a family

1 vacation to their nephew's Boise wedding with a stopover in Las Vegas. At the time their
2 trip began, the HUNTER family bank account had a negative balance and incurred six
3 insufficient funds fees (totaling \$204).

4 129) On or about June 30, 2015, after the Treasurer questioned a number of
5 charges that were made during their recent vacation in Hawaii, the HUNTERS repaid
6 \$5,245.71 to the Campaign. The Treasurer reported this payment as "reimbursement for
7 personal expenses."

8 130) On or about July 8, 2015, in La Mesa, California, MARGARET
9 HUNTER spent \$700 in Campaign funds at a local dentist toward the family's overdue
10 balance of \$7,258 resulting from a variety of family dental services.

11 131) On or about July 18, 2015, the HUNTERS spent \$87.50 in Campaign
12 funds at Fandango to purchase tickets for a movie that same day. To conceal and disguise
13 this illegal payment, MARGARET HUNTER told the Treasurer that the charge was to "gift
14 ticks towards a local league football fundraiser."

15 132) On or about July 19, 2015, in Alpine, California, DUNCAN HUNTER
16 withdrew \$300 in Campaign funds from an ATM before heading to the Del Mar Racetrack
17 with Individuals 1A and 1B – one of approximately 26 occasions in 2015 and 2016 that
18 DUNCAN HUNTER and MARGARET HUNTER withdrew a total of more than \$4,800 in
19 cash from the Campaign's accounts for primarily personal use. To conceal and disguise
20 their personal use of the money withdrawn on July 19, 2015, MARGARET HUNTER
21 falsely told the Treasurer that the "cash was needed for various small projects & events
22 involving volunteers." She later falsely claimed that the cash "was used for hardware
23 supplies."

24 133) On or about July 19, 2015, in Del Mar, California, the HUNTERS spent
25 \$362.06 in Campaign funds for food, drinks, and tickets to the Del Mar Racetrack with their
26 family and Individuals 1A and 1B.

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1 134) On or about July 21, 2015, in Washington, D.C., DUNCAN HUNTER
2 spent a total of \$114.91 in Campaign funds on drinks at the speakeasy above Acqua Al 2
3 and an Uber ride while socializing with Individual 15.

4 135) On or about July 26, 2015, in Alpine, California, DUNCAN HUNTER
5 spent \$296.58 in Campaign funds at Albertsons, where he bought \$196.58 in family
6 groceries, including dog food, milk, roasted chickens, and paper towels, and received \$100
7 back in cash.

8 136) On or about July 29, 2015, in Chula Vista, California, MARGARET
9 HUNTER spent \$253.62 in Campaign funds at SeaWorld's Aquatica Family Waterpark to
10 entertain family members. To conceal and disguise this illegal payment, she suggested to
11 the Treasurer that the charges should be classified as an "educational tour" as they were
12 related to a "daylong entrance and educational meet on their issues and programs."

13 137) On or about August 5, 2015, in La Mesa, California, MARGARET
14 HUNTER spent \$700 in Campaign funds at a local dentist to continue to pay down the
15 family's overdue balance. In order to conceal and disguise this illegal payment, she told
16 the Treasurer that part of the payment was a charitable contribution for "Smiles for Life."

17 138) On or about August 8, 2015, in Alpine, California, MARGARET
18 HUNTER spent \$300 in Campaign funds at the local water utility after the utility threatened
19 to discontinue the HUNTERS' water service due to unpaid bills.

20 139) On or about August 12, 2015, in El Cajon, California, MARGARET
21 HUNTER spent \$3,500 in Campaign funds to pay the family's tuition bill at Christian
22 Unified Schools – one of three different dates in 2015 that MARGARET HUNTER spent a
23 total of \$6,150 in Campaign funds to pay tuition. To conceal and disguise these illegal
24 payments, the HUNTERS provided a number of conflicting explanations, including that the
25 payments were charitable contributions.

26 140) On or about August 16, 2015, in El Cajon, California, MARGARET
27 HUNTER spent \$216.50 in Campaign funds at Dick's Sporting Goods to purchase a pair of
28 running shoes and other items. To conceal and disguise this illegal charge, MARGARET

1 HUNTER falsely informed the Treasurer that the items were for an annual dove hunting
2 event involving wounded warriors and were, therefore, "equipment related (event
3 supplies)."

4 141) On or about August 16, 2015, in El Cajon, California, MARGARET
5 HUNTER spent \$99.53 in Campaign funds at Regis Hair Salon for haircuts and other
6 services. To conceal and disguise this illegal purchase, she falsely informed the Treasurer
7 that it was for "Gift Basket Items."

8 142) On or about August 17, 2015, MARGARET HUNTER spent \$152.25 in
9 Campaign funds at Nordstrom to make an online purchase of cosmetics. To conceal and
10 disguise this illegal charge, she falsely told the Treasurer that the charge was for "gift basket
11 items Boys and Girls Clubs of San Diego."

12 143) On or about August 27, 2015, in San Diego, California, DUNCAN
13 HUNTER spent \$276.84 in Campaign funds to play golf at the Riverwalk Golf Club with
14 Individual 10.

15 144) On or about September 5, 2015, in El Cajon, California, MARGARET
16 HUNTER spent \$235.36 in Campaign funds at Michaels craft store – one of 14 different
17 occasions between 2010 and 2015 that MARGARET HUNTER spent a total of \$2,264 in
18 Campaign funds primarily to purchase decorative items, crafts, candy, children's books, and
19 cooking supplies for her and the HUNTER family's personal use.

20 145) On or about September 17, 2015, MARGARET HUNTER spent
21 \$140.00 in Campaign funds at PayPal to enter a family member in a dance competition.

22 146) On or about September 24, 2015, MARGARET HUNTER spent
23 \$402.90 in Campaign funds at Expedia to reserve two rooms at the Westin LAX during the
24 dance competition.

25 147) On or about September 26, 2015, in Anaheim, California, the
26 HUNTERS spent \$229.44 in Campaign funds at Disneyland's Star Trader shop on gifts,
27 including two Minnie Mouse Ear headbands, a Star Wars droid knit beanie, and a raglan-
28 sleeve black-and-gray Star Wars girls T-shirt. In order to conceal and disguise this

1 transaction, MARGARET HUNTER falsely informed the Treasurer that the charge was for
2 “food/bev.”

3 148) On or about September 27, 2015, in Los Angeles, California, the
4 HUNTERS spent \$219.23 in Campaign funds at the Westin LAX for food, drinks, and
5 incidentals for their family during a dance competition.

6 149) On or about October 6, 2015, in Alpine, California, after his Campaign
7 debit card was disabled, DUNCAN HUNTER retrieved his Campaign credit card from
8 MARGARET HUNTER but allowed her to retain access to the Campaign credit card
9 number for online purchases.

10 150) On or about October 13, 2015, MARGARET HUNTER paid \$1,268 in
11 Campaign funds to SDG&E for utilities at the HUNTERS’ family home.

12 151) On or about October 21, 2015, in response to a fraud alert on the
13 Campaign credit card relating to a number of Steam Games charges (totaling at least \$119),
14 MARGARET HUNTER told the Treasurer that the charges were not fraudulent, asserting
15 that “these should not have fallen under this card they’re personal.” She promised to “nix
16 this saved card in [the] computer and pay it personal later today.”

17 152) On or about October 21, 2015, MARGARET HUNTER asked the
18 Treasurer to order her a Campaign debit card issued in her name. He complied and she
19 received her own Campaign debit card shortly thereafter.

20 153) On or about October 27 to 28, 2015, in Washington, D.C., DUNCAN
21 HUNTER spent \$42.36 in Campaign funds for an Uber ride to and from the home of
22 Individual 17.

23 154) On or about October 31, 2015, in San Diego, California, DUNCAN
24 HUNTER spent \$223.32 in Campaign funds at Jake’s Del Mar for the HUNTERS’ portion
25 of a personal dinner with Individuals 4A and 4B.

26 155) On or about November 13, 2015, in El Cajon, California, MARGARET
27 HUNTER spent \$286.41 in Campaign funds at Macy’s to purchase a three-piece luggage
28 set in advance of the family’s upcoming vacation in Italy.

1 156) On or about November 19 to 29, 2015, the HUNTERS spent \$14,261.33
2 (including airfare) in Campaign funds to pay for a family vacation to Italy.

3 157) On or about November 23, 2015, in an attempt to justify the use of
4 Campaign funds to pay for the family's trip to Italy, DUNCAN HUNTER attempted to set
5 up a day tour of a U.S. naval facility in Italy. After Navy officials responded that they could
6 only provide a tour on a particular date, DUNCAN HUNTER said he would discuss the
7 proposed date with MARGARET HUNTER, then subsequently told his Chief of Staff, "tell
8 the navy to go f*** themselves [no alteration in original]," and no tour occurred.

9 158) In or about late 2015, to conceal the illegal use of Campaign funds to
10 pay for the Italy vacation, MARGARET HUNTER falsely told the Treasurer that the
11 various charges related to this vacation "were mostly military/defense meet related" despite
12 emailing a friend that "Italy was amazing. Truly our best family trip so far. Like that saying
13 'if traveling was free you'd never see me again'!"

14 159) On or about December 13, 2015, in Coronado, California, MARGARET
15 HUNTER spent \$291.64 in Campaign funds at the Hotel del Coronado for a family ice
16 skating outing.

17 160) On or about December 21, 2015, in San Diego, California, the
18 HUNTERS spent \$677.42 in Campaign funds at Lou & Mickey's for food and drinks during
19 a personal dinner with Individuals 1A and 1B.

20 161) On or about January 3, 2016, in Ramona, California, DUNCAN
21 HUNTER spent \$140.62 in Campaign funds to play golf at the Mount Woodson Golf Club
22 with his brother, his father, and Individual 4A.

23 162) On or about January 5, 2016, MARGARET HUNTER spent \$835.50 in
24 Campaign funds at Event Tickets for family tickets to see Riverdance at the San Diego Civic
25 Theater. To conceal and disguise this illegal charge, she falsely informed the Treasurer that
26 it was for "San Diego Civic Center for Republican Women Federated/Fundraising."

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1 163) On or about January 9, 2016, in Lakeside, California, DUNCAN
2 HUNTER spent \$276.15 in Campaign funds to golf at the Barona Creek Golf Resort with
3 family members and Individual 9.

4 164) On or about January 15, 2016, in San Diego, California, MARGARET
5 HUNTER spent \$418.99 in Campaign funds to take her family and their friends to
6 SeaWorld.

7 165) On or about January 17, 2016, in Phoenix, Arizona, the HUNTERS
8 spent \$632.53 in Campaign funds at the Arizona Grand Resort & Spa for a family vacation
9 centered on a family member's dance competition.

10 166) On or about January 31, 2016, in Alpine, California, DUNCAN
11 HUNTER and his Chief of Staff discussed how to address the fact that the Campaign's draft
12 2015 Year-End report to be filed with the FEC contained more than \$22,000 in Campaign
13 spending that could be perceived to have been converted for personal use.

14 167) On or about January 31, 2016, DUNCAN HUNTER authorized his
15 Treasurer to file the Campaign's 2015 Year-End report with the FEC. Among other
16 personal charges, this report disclosed that 67 charges (totaling \$1,302) to Steam Games
17 and one charge to Christian Unified Schools (\$1,650) were "personal expense[s] – to be
18 paid back." However, the report falsely claimed as legitimate campaign expenses other
19 personal charges, including another \$1,000 charge to Christian Unified Schools ("Donation
20 For Local Organization Fundraiser"), \$655.47 in charges to Albertsons
21 ("Food/Beverages"), \$2,745.94 in charges to Costco ("Office Supplies" and
22 "Food/Beverages"), \$1,339.86 in charges to Cox Communications ("Utilities"), \$230 in
23 charges to Feis Productions ("Event Entertainment"), a \$223.32 charge to Jake's Del Mar
24 ("Food/Beverages"), \$728.45 in charges to Ki's Restaurant ("Food/Beverage"), \$394.40 in
25 charges to Macy's ("Donations For Gift Baskets For Local Organizations"), \$525.02 in
26 charges to Target ("Office Supplies"), and \$1,363.03 in charges to Walmart ("Office
27 Supplies" and "Food/Beverages").

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1 168) On or about February 1, 2016, in response to questions raised by the
2 Treasurer for about ten months, MARGARET HUNTER falsely claimed for the first time
3 that the Steam Games charges were fraudulent.

4 169) On or about February 12 to 14, 2016, in Phoenix, Arizona,
5 MARGARET HUNTER spent \$2,856.72 in Campaign funds to pay for a family vacation
6 at the Arizona Grand Resort & Spa.

7 170) On or about February 19 to 21, 2016, in Garden Grove, California,
8 MARGARET HUNTER spent \$961.24 in Campaign funds at the Hyatt Regency Orange
9 County to pay for a family vacation centered on a family member's dance competition.

10 171) On or about March 4, 2016, at 11:52 p.m., in Washington, D.C.,
11 DUNCAN HUNTER spent \$354.25 in Campaign funds for drinks at the Jack Rose Dining
12 Saloon while entertaining his brother at a bachelor party for Individual 8.

13 172) On or about March 4, 2016, in Washington, D.C., DUNCAN HUNTER
14 spent \$462.46 in Campaign funds for 30 shots of tequila and one steak at El Tamarindo
15 restaurant during Individual 8's bachelor party.

16 173) On or about March 5, 2016, in Washington, D.C., DUNCAN HUNTER
17 spent \$127.56 in Campaign funds for food and drinks at Stoney's Bar and Restaurant with
18 his brother.

19 174) On or about March 5, 2016, in Washington, D.C., DUNCAN HUNTER
20 spent \$220.63 in Campaign funds for food and drinks at Fado's Irish Pub while watching a
21 televised UFC fight with his brother and friends, including Individual 2A and Individual 8.

22 175) On or about March 5, 2016, in Coronado, California, MARGARET
23 HUNTER spent \$360.58 in Campaign funds at Emerald City Surf Shop purchasing a variety
24 of clothing items for personal use.

25 176) On or about March 5, 2016, in La Jolla, California, MARGARET
26 HUNTER spent \$203.20 in Campaign funds for lunch at Duke's restaurant with a family
27 member and the family member's friends.

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1 177) On or about March 7, 2016, in Lakeside, California, MARGARET
2 HUNTER spent \$1,200 in Campaign funds at the Easy Open Door Company to purchase a
3 garage door for the HUNTERS' personal residence.

4 178) On or about March 13, 2016, MARGARET HUNTER spent \$668.20 in
5 Campaign funds at United Airlines to purchase round-trip plane tickets for her nephew to
6 fly from Philadelphia to New Orleans.

7 179) On or about March 17, 2016, in La Mesa, California, MARGARET
8 HUNTER spent \$271.22 in campaign funds at Best Buy to buy a gaming keyboard and
9 gaming mouse.

10 180) On or about March 21, 2016, in Washington, D.C., DUNCAN HUNTER
11 spent \$130.10 in Campaign funds for drinks at Busboys and Poets during a personal night
12 out with friends including Individuals 2A and 2B, Individual 7, and Congressman C.

13 181) On or about March 23, 2016, in Washington, D.C., DUNCAN HUNTER
14 spent \$865.63 in Campaign funds for a room at the Liaison Capitol Hill while Individual 7
15 visited from San Diego.

16 182) On or about March 24, 2016, in San Diego, California DUNCAN
17 HUNTER spent \$145.55 at the Riverwalk Golf Club to play golf with Individual 1A and
18 1A's friend.

19 183) On or about March 27, 2016, in Coronado, California, the HUNTERS
20 spent \$669.07 in Campaign funds at the Hotel del Coronado for a family Easter Sunday
21 Brunch in the Crown Room.

22 184) On or about March 28, 2016, in Alpine, California, MARGARET
23 HUNTER spent \$38.20 in campaign funds at Fandango to purchase three tickets for a movie
24 that same day. To conceal and disguise the illegal transaction, she falsely informed the
25 Treasurer that the charge was for a "Gift bundle basket for foothills republican women
26 spring fashion show."

27 185) On or about April 4, 2016, in El Cajon, California, MARGARET
28 HUNTER spent \$87.73 in Campaign funds at Home Depot – one of nine separate occasions

1 between 2012 and 2016 that MARGARET HUNTER spent a total of \$1,831.63 at Home
2 Depot primarily to purchase personal household and decorative items.

3 186) On or about April 5, 2016, the day after the FEC inquired about 67
4 Steam Game charges, MARGARET HUNTER called First National Bank and falsely
5 reported that the video game charges were fraudulent. In this call, she insisted that no
6 teenagers had access to the credit card. Following this false report, the bank credited \$1,302
7 to the Campaign account.

8 187) On or about April 5, 2016, the day after the FEC inquired about the
9 Christian Unified School Charge, MARGARET HUNTER repaid \$6,150 to the Campaign
10 to cover three charges she had made to the school using Campaign funds.

11 188) On or about April 7, 2016, after numerous articles appeared in the San
12 Diego Union Tribune and other media outlets, the HUNTERS repaid \$5,746 to the
13 Campaign related to additional personal charges identified in news reports.

14 189) On or about May 12, 2016, in Washington, D.C., DUNCAN HUNTER
15 spent \$560.90 in Campaign funds at Del Frisco's Double Eagle Steak House for dinner and
16 drinks with his mother.

17 190) On or about May 18, 2016, MARGARET HUNTER spent \$265.94 in
18 Campaign funds with Expedia to reserve a hotel room at the Holiday Inn Express in
19 Picayune, Mississippi for a family vacation.

20 191) On or about June 24, 2016, in Washington, D.C., DUNCAN HUNTER
21 spent \$409.45 in Campaign funds at L'Homage Bistro Francais while socializing with
22 Individuals 2A and 2B, Individual 6, and Congressman C and his date. That same day, the
23 HUNTER family bank account had a negative balance and incurred two insufficient funds
24 fees.

25 192) On or about July 5, 2016, MARGARET HUNTER obtained \$441.63
26 from the Campaign as reimbursement for a July 4, 2016 personal outing at Sally's Fish
27 House and Bar with the HUNTER family and Individual 7.

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1 193) On or about August 4, 2016, in Palm Springs, California, DUNCAN
2 HUNTER spent \$592.63 in Campaign funds at LG's Prime Steakhouse for dinner during a
3 personal golfing weekend with Individual 1A, Individual 11, and Individual 12.

4 194) On or about September 15, 2016, at 7:40 a.m., in Washington, D.C.,
5 DUNCAN HUNTER spent \$32.27 in Campaign funds for an Uber ride from Individual 18's
6 home to DUNCAN HUNTER's office.

7 195) On or about October 2, 2016, in San Diego, California, the HUNTERS
8 spent \$339.18 in Campaign funds at Blue Point Coastal for a personal night out with
9 Individual 7, Individual 13, and Individual 13's wife.

10 196) On or about October 13, 2016, in Santa Barbara, California, DUNCAN
11 HUNTER spent \$300 in Campaign funds to purchase two greens fees for a round of golf at
12 the Sandpiper Golf Club with Individual 1A (who gave DUNCAN HUNTER \$150 in cash
13 for his share of the fees). That same day, the HUNTER family bank account had a negative
14 balance and incurred two separate insufficient funds fees.

15 197) On or about November 5, 2016, in San Diego, California, the
16 HUNTERS spent \$111.18 in Campaign funds at Pinzimini restaurant for appetizers and
17 drinks with Individuals 1A and 1B.

18 198) On or about November 5, 2016, in San Diego, California, the
19 HUNTERS spent \$300 in Campaign funds at Searsucker restaurant during a birthday party
20 for Individual 1A.

21 199) On or about November 8, 2016, in Alpine, California, after repeated
22 questioning by the FEC and news media about certain Campaign expenditures, DUNCAN
23 HUNTER repaid \$48,650.98 to the Campaign to offset charges the HUNTERS had made
24 over the past year to purchase goods or services from 57 different merchants. DUNCAN
25 HUNTER characterized the repayment as being for "unauthorized expenditures" that he
26 now deemed either "personal in nature" or "without adequate support," and continued to
27 conceal more than \$200,000 in personal expense the HUNTERS had illegally paid with
28 Campaign funds.

1 200) On or about December 31, 2016, in Alpine, California, DUNCAN
2 HUNTER authorized MARGARET HUNTER to continue receiving a salary for
3 purportedly being the Campaign Manager.

4 All in violation of Title 18, United States Code, Section 371.

5 **Counts 2-44: Wire Fraud**

6 (18 USC §§ 1343 & 2)

7 23. Paragraphs 1 through 17 and all sub-paragraphs are realleged and incorporated
8 herein by reference.

9 24. Beginning as early as December 2009 and continuing up through and including
10 the end of 2016, within the Southern District of California and elsewhere, Defendants
11 DUNCAN HUNTER and MARGARET HUNTER, knowingly and with the intent to
12 defraud, devised a material scheme to defraud the Campaign and to obtain money and
13 property from it by means of materially false and fraudulent pretenses, representations and
14 promises, and by intentional concealment and omission of material facts.

15 25. Paragraphs 20 through 22 and all sub-paragraphs are realleged and
16 incorporated herein as more fully describing the scheme to defraud the Campaign and obtain
17 its money and property.

18 **Interstate Wires**

19 26. On or about the dates listed below (Column “A”), within the Southern District
20 of California and elsewhere, Defendants DUNCAN HUNTER and MARGARET
21 HUNTER, for the purpose of executing an essential part of the aforesaid scheme to defraud,
22 caused to be transmitted by wire in interstate commerce the writings, signs, and signals
23 described below (Column “B”), to wit:

24

Count	“A” Date	“B” Item Transmitted
2	4/20/13	A \$210.91 debit card payment by DUNCAN HUNTER at Island Prime in San Diego, California.
3	4/22/13	An email from DUNCAN HUNTER to his Chief of Staff enclosing photos of two Island Prime receipts.

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Count	"A" Date	"B" Item Transmitted
4	11/16/13	A \$100.69 debit card payment by DUNCAN HUNTER at Casa de Pico in La Mesa, California.
5	11/16/13	An email from DUNCAN HUNTER to his Chief of Staff regarding a "dinner with volunteers/contributors" at Casa de Pico.
6	12/10/13	An email from United Airlines to MARGARET HUNTER regarding the purchase of air miles used to fly a family member to the East Coast.
7	2/28/14	A text message from MARGARET HUNTER to DUNCAN HUNTER regarding obtaining a room at the La Quinta Resort & Club.
8	4/14/14	An email from MARGARET HUNTER to DUNCAN HUNTER's Chief of Staff regarding the "lodging and meals" at the La Quinta Resort & Club.
9	7/4/14	A \$184.38 debit card payment by MARGARET HUNTER at Sally's Restaurant in San Diego, California.
10	7/8/14	An electronic claim submitted by MARGARET HUNTER requesting a \$201.38 reimbursement for a meal at Sally's Restaurant
11	7/9/14	A \$125 debit card payment by MARGARET HUNTER at United Airlines related to airfare for the HUNTERS' pet.
12	7/14/14	An email from MARGARET HUNTER to DUNCAN HUNTER's Chief of Staff related to a payment to Cox Communications.
13	10/22/14	An email from DUNCAN HUNTER to his Chief of Staff falsely claiming that a golf outing at the Rancho Bernardo Golf Club was "a Christian thing" with a supporter.
14	12/2/14	An email from MARGARET HUNTER to DUNCAN HUNTER's Chief of Staff providing false explanations for expenses to appear on the FEC filing.
15	12/14/14	A \$411.19 debit card payment by DUNCAN HUNTER at Vons in Alpine, California.
16	3/18/15	An electronic claim submitted by MARGARET HUNTER requesting a \$131.76 reimbursement for a meal at Blue Point Coastal Cuisine.
17	3/18/15	An electronic claim submitted by MARGARET HUNTER requesting a \$438.48 reimbursement for a meal at Island Prime.
18	3/20/15	A \$199.60 debit card payment by DUNCAN HUNTER at Albertsons in Alpine, California.
19	5/3/15	An \$869.26 credit card payment by MARGARET HUNTER at Cowboy Star in San Diego, California.

Count	"A" Date	"B" Item Transmitted
20	5/09/15	An \$839.84 debit card payment by MARGARET HUNTER at Hotel Del Coronado in Coronado, California.
21	5/10/15	A \$159.84 credit card payment by MARGARET HUNTER at Hotel Del Coronado in Coronado, California.
22	5/26/15	An email from MARGARET HUNTER to the Treasurer providing false explanations for campaign expenditures.
23	6/10/15	A \$1,137.00 credit card payment by MARGARET HUNTER at Center for Oral and Facial Surgery in El Cajon, California.
24	7/7/15	An email from MARGARET HUNTER to the Treasurer regarding a \$202.15 debit card payment at Carmine's Las Vegas.
25	7/19/15	An \$87.50 credit card payment by MARGARET HUNTER at Fandango, based in Los Angeles, California.
26	7/19/15	A \$159.06 credit card payment by MARGARET HUNTER at Del Mar Race Track Restaurant in Del Mar, California.
27	7/29/15	A \$135.99 credit card payment by MARGARET HUNTER at Aquatica in Chula Vista, California.
28	8/5/15	A \$700.00 credit card payment by MARGARET HUNTER at Jeff Gray, DDS in La Mesa, California.
29	8/5/15	An email from MARGARET HUNTER to the Treasurer providing false explanations for campaign expenditures.
30	8/27/15	A \$232.00 debit card payment by DUNCAN HUNTER at Riverwalk Golf Club in San Diego, California.
31	10/14/15	An email from MARGARET HUNTER to the Treasurer in Alexandria, Virginia providing false explanations for campaign expenditures.
32	10/31/15	A \$223.32 credit card payment by DUNCAN HUNTER at Jake's Del Mar in Del Mar, California.
33	11/2/15	A \$403.20 credit card payment by MARGARET HUNTER at United Airlines based in Chicago, Illinois.
34	11/13/15	A \$286.41 credit card charge by MARGARET HUNTER at Macy's in El Cajon, California.
35	12/13/15	A \$100.00 credit card payment by MARGARET HUNTER at Hotel Del Coronado in Coronado, California.
36	1/3/16	A \$140.62 credit card payment by DUNCAN HUNTER at Mount Woodson Golf Club in Ramona, California.
37	1/9/16	A \$200.00 credit card payment by DUNCAN HUNTER at Barona Resort in El Cajon, California.
38	1/27/16	An email from MARGARET HUNTER to the Treasurer providing false explanations for campaign expenditures.

Count	"A" Date	"B" Item Transmitted
39	3/5/16	A \$203.20 credit card payment by MARGARET HUNTER at Duke's in La Jolla, California.
40	3/17/16	An email from MARGARET HUNTER to the Treasurer requesting reimbursement for a meal at Duke's in La Jolla, California.
41	5/18/16	An email from Expedia to MARGARET HUNTER confirming the reservation of a room at the Holiday Inn Express in Picayune, Mississippi.
42	7/5/16	An email from MARGARET HUNTER to the Treasurer requesting reimbursement for a meal at Sally's Restaurant in San Diego, California.
43	11/5/16	A \$111.18 credit card payment by DUNCAN HUNTER at Pinzimini in San Diego, California.
44	11/6/16	A \$300 credit card payment by DUNCAN HUNTER at Searsucker in San Diego, California.

All in violation of Title 18, United States Code, Section 1343 and 2.

Counts 45-57: Falsification of Records Related to Campaign Finance

(18 USC §§ 1519 & 2)

27. Paragraphs 1 through 17 and all sub-paragraphs are realleged and incorporated herein by reference.

28. On or about the dates listed below, within the Southern District of California and elsewhere, Defendants DUNCAN HUNTER and MARGARET HUNTER knowingly concealed, covered up, falsified, and made a false entry in the record and document listed below with the intent to impede, obstruct, and influence the investigation and proper administration of matters within the jurisdiction of the Federal Election Commission and the Federal Bureau of Investigation, and in relation to and in contemplation of such matters:

Count	Date	FEC Form 3 Report of Receipts and Disbursements
45	7/15/2013	The 2013 July Quarterly Report
46	1/31/2014	The 2013 Year-End Report
47	4/14/2014	The 2014 April Quarterly Report
48	7/15/14	The 2014 July Quarterly Report

Count	Date	FEC Form 3 Report of Receipts and Disbursements
49	10/15/2014	The 2014 October Quarterly Report
50	12/2/2014	The 2014 Post-General Election Report
51	4/15/2015	The 2015 April Quarterly Report
52	7/15/2015	The 2015 July Quarterly Report
53	10/15/2015	The 2015 October Quarterly Report
54	1/31/2016	The 2015 Year-End Report for 2015
55	4/15/2016	The 2016 April Quarterly Report
56	10/15/2016	The 2016 October Quarterly Report
57	12/8/2016	The 2016 Post-General Election Report

All in violation of Title 18, United States Code, Sections 1519 and 2.

Count 58: Prohibited Use of Campaign Contributions

(52 USC §§ 30109(d) & 30114(b)(1) & 18 USC § 2)

29. Paragraphs 1 through 17 and all sub-paragraphs are realleged and incorporated herein by reference.

30. In the calendar year 2014, within the Southern District of California and elsewhere, Defendants DUNCAN HUNTER and MARGARET HUNTER knowingly and willfully converted \$25,000 and more of Campaign funds to their personal use by using them to fulfill personal commitments, obligations, and expenses that would have existed irrespective of defendant DUNCAN HUNTER's election campaign or duties as a holder of federal office.

All in violation of Title 52, United States Code, Sections 30109(d) and 30114(b)(1), and Title 18, United States Code, Section 2.

Count 59: Prohibited Use of Campaign Contributions

(52 USC §§ 30109(d) & 30114(b)(1) & 18 USC § 2)

31. Paragraphs 1 through 17 and all sub-paragraphs are realleged and incorporated herein by reference.

1 32. In the calendar year 2015, within the Southern District of California and
2 elsewhere, Defendants DUNCAN HUNTER and MARGARET HUNTER knowingly and
3 willfully converted \$25,000 and more of Campaign funds to their personal use by using
4 them to fulfill personal commitments, obligations, and expenses that would have existed
5 irrespective of defendant DUNCAN HUNTER's election campaign or duties as a holder of
6 federal office.

7 All in violation of Title 52, United States Code, Sections 30109(d) and 30114(b)(1), and
8 Title 18, United States Code, Section 2.

9 **Count 60: Prohibited Use of Campaign Contributions**

10 (52 USC §§ 30109(d) & 30114(b)(1) & 18 USC § 2)

11 33. Paragraphs 1 through 17 and all sub-paragraphs are realleged and incorporated
12 herein by reference.

13 34. In the calendar year 2016, within the Southern District of California and
14 elsewhere, Defendants DUNCAN HUNTER and MARGARET HUNTER knowingly and
15 willfully converted \$25,000 and more of Campaign funds to their personal use by using
16 them to fulfill personal commitments, obligations, and expenses that would have existed
17 irrespective of defendant DUNCAN HUNTER's election campaign or duties as a holder of
18 federal office.

19 All in violation of Title 52, United States Code, Sections 30109(d) and 30114(b)(1), and
20 Title 18, United States Code, Section 2.

21 DATED: August 21, 2018.

22 A TRUE BILL


23 _____
24 Foreperson

23 ADAM L. BRAVERMAN
24 United States Attorney

25
26 By: 

27 EMILY W. ALLEN
28 W. MARK CONOVER
PHILLIP L.B. HALPERN
Assistant U.S. Attorneys