



employee of the United States House of Representatives—specifically the Office of Representative Chris Cannon—who terminated his employment with the House on January 2, 2009.

### **STATUTORY REQUIREMENTS**

6. The Act establishes financial disclosure requirements for certain employees and appointed and elected officials of the government of the United States. The government officials and employees who are subject to the Act's reporting requirements are enumerated in 5 U.S.C. app. 4, § 101.

7. Individuals subject to the Act's reporting requirements are required to report, among other things, the following:

The source, type, and amount or value of income (other than income referred to in subparagraph (B)) from any source (other than from current employment by the United States Government) and the source, date, and amount of honoraria from any source, received during the preceding calendar year, aggregating \$200 or more in value . . . .

5 U.S.C. app. 4, § 102(a)(1)(A).

8. The Act authorizes the Attorney General to bring a civil action against any individual who knowingly and willfully falsifies or who knowingly and willfully fails to file or report any information required to be reported pursuant to the Act. 5 U.S.C. app. 4, § 104(a).

9. The Act provides that the court in which such action is brought may assess a civil penalty against such individual in any amount, not to exceed \$50,000. 5 U.S.C. app. 4, § 104(a).

### **MR. HUNTER'S WILLFUL VIOLATION OF THE ACT**

10. Mr. Hunter is subject to the Act's public financial disclosure reporting requirements because, as Chief of Staff to Representative Cannon, Mr. Hunter was an "officer or employee of the Congress" who, for at least 60 days, occupied "a position for which the rate of

basic pay is equal to or greater than 120 percent of the minimum rate of basic pay payable for GS-15 of the General Schedule.” *See* 5 U.S.C. app. 4, § 101(f)(10); *id.* § 108(13)(B).

11. Mr. Hunter terminated his employment with Congress on or about January 2, 2009.

12. Subsequent to his termination, Mr. Hunter was made aware by the Clerk of the House that he was required to file a financial disclosure report by March 20, 2009, as specified in a letter from the Clerk of the House to Mr. Hunter.

13. On or about September 15, 2010, Mr. Hunter was informed by letter from the House Committee on Ethics (“the Committee”) that his termination financial disclosure report had not been received and was asked to submit it within 30 days of the date of that letter.

14. On or about November 4, 2011, Mr. Hunter was informed by letter from the Committee that his termination financial disclosure report had still not been received and was asked to submit it and a late filing fee “immediately,” or else the Committee would take appropriate action.

15. On or about August 7, 2012, Mr. Hunter was informed by letter from the Committee marked “FINAL NOTICE” and sent by certified mail indicating that his termination financial disclosure report had still not been received and was again asked to submit it and a late filing fee “immediately,” or else the Committee would take appropriate action.

16. On August 10, 2012, Mr. Hunter signed a certified mail receipt attesting to his receipt of the letter described in paragraph 15.

17. To date, Mr. Hunter has not filed the required termination financial disclosure report.

**COUNT I**

18. Plaintiff reincorporates the allegations of Paragraphs 1 through 17 above as if fully set forth herein.

19. Mr. Hunter violated the Ethics in Government Act, 5 U.S.C. app. 4, § 104, by knowingly and willfully failing to file his termination financial disclosure report within the time required by the Act.

**RELIEF REQUESTED**

WHEREFORE, the plaintiff, the United States of America, prays that this Court enter judgment against the defendant, Joseph Hunter, as follows:

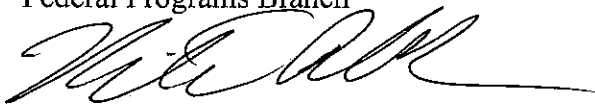
- A. Assess a civil penalty under Count I of up to \$50,000; and
- B. Grant the plaintiff such further relief as the Court may deem just and equitable, including the plaintiff's costs.

Respectfully submitted this 18th day of March, 2014,

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