



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

July 15, 2026

Dr. Michael Hunter
Forensic Doctors Group
Via email only: [REDACTED]

No Action Closure Letter re FPPC No. 2025-00353; Dr Michael Hunter, Forensic Doctors Group

Dear Dr. Hunter:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to an anonymous complaint alleging that your contracts with San Joaquin County to provide services for the Office of the Medical Examiner, individually and via your company Forensic Doctors Group, violated conflict of interest laws under the Political Reform Act and Section 1090 of the Government Code. The Enforcement Division completed its investigation and has decided to close its file on this matter without further action.

The allegations contained in the anonymous complaint were disproven by the Enforcement Division’s investigation. With respect to the initial contract that you and your company entered with the City in 2019, there was no violation of the Political Reform Act or Section 1090 because you were not a County official at the time. With respect to the 2023 contract, “[a]ctions by a public official relating to compensation or the terms of the official’s employment or consulting contract” do not fall within the scope of Section 87100—the Political Reform Act’s general conflict of interest provision relating to participation in governmental decisions. (Regulation 18704(d)(3).) Additionally, independent contractors are covered by Section 1090 where they have “duties to engage in or advise on public contracting that they are expected to carry out on the government’s behalf.” (*People v. Superior Court (Sahlolbei)* (2017) 3 Cal.5th 230, 245.) During our investigation, we confirmed with the County Counsel that you had no administrative duties with respect to contracting on behalf of the County and did not advise the County on its public contracts, nor did you provide any input to the County regarding contracts in your capacity as a public official/independent contractor. Consequently, we determined the second contract from 2023 also did not implicate Section 1090.

For these reasons, we are closing this matter.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in sections 18109 through 18997 of Title 2 of the California Code of Regulations.

Should you have any questions regarding this letter, please feel free to contact me at (279) 237-5924 or kcornwall@fppc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'KC' followed by a stylized flourish.

Kevin Cornwall
Senior Commission Counsel
Enforcement Division