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DR #P002-2012-1375 – AGO SIS
Downtown Justice Precinct

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,
Plaintiff,

v.

JOHN DAVID MacDONALD (001),
Defendant.

Case No: *CR2012-009016-001-ST*

DIRECT COMPLAINT

CHARGING VIOLATIONS OF:

**COUNT 1: FAILURE TO REPORT
PRINCIPAL EXPENDITURES**, a Class 1
Misdemeanor, in violation of A.R.S. §§ 41-
1232.02(A)

The complainant herein personally appears and, being duly sworn, complains on information and belief against **JOHN DAVID MacDONALD** charging that in Maricopa County, Arizona:

COUNT 1

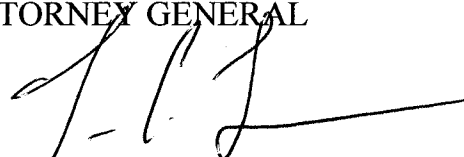
FAILURE TO REPORT PRINCIPAL EXPENDITURES

On or about November 23, 2009, defendant **JOHN DAVID MacDONALD** did knowingly file a document provided for in Title 41, Chapter 7, Article 8.1 that contained a materially false statement or material omission, in violation of A.R.S. §§41-1232.02(A), 41-1232, 41-1231, 41-1237, 13-301, 13-302, 13-303, 13-304, 13-306, 13-707 and 13-802.

Said conduct occurred when the defendant **JOHN DAVID MacDONALD** did file a "Principal Annual Report of Lobbying Expenditures" for his client the Tostitos Fiesta Bowl for the year 2008 which contained a material false statement, to wit, that expenses benefitting nine (9) legislators as a part of a trip to Boston, Massachusetts on or about October 16-19, 2008, were reportable as Special Event expenses, when they were not in fact Special Event expenses because all members of the legislature were not invited on the trip.

DATED this 7th day of September, 2012.

THOMAS C. HORNE
ATTORNEY GENERAL



TODD C. LAWSON
Assistant Attorney General
Criminal Division

 #381 AGENCY: Arizona Attorney General's Office,
SPECIAL AGENT LAUREN BUHROW, COMPLAINANT

SUBSCRIBED AND SWORN upon information and belief this 7th day of September, 2012.