

EXHIBIT 20

The Honorable Steven Palazzo
Member, U.S. House of Representatives

OFFICE OF CONGRESSIONAL ETHICS
WASHINGTON, DC 20515

**Re: REQUEST FOR INFORMATION
Review No. 20-2124**

- (7) The following documents and communication:
- a. All client engagement letters or agreements between Palazzo for Congress (or anyone acting on its behalf) and Palazzo & Company, LLC or Breazeale, Saunders & O'Neil, Ltd.
 - b. All invoices for services to Palazzo for Congress, between January 1, 2017 and December 31, 2019, from both Palazzo & Company, LLC and Breazeale, Saunders & O'Neil, Ltd.
 - c. All documents and communications related to services provided by Palazzo & Company, LLC and Breazeale, Saunders, O'Neil, Ltd. To Palazzo for Congress between January 1, 2017 and December 31, 2019.
 - d. Efforts made to establish the fair market value of Palazzo & Company, LLC's services.

Response with Documents Attached:

Payments to Palazzo & Company, LLC were for professional services rendered, such as general ledger, bill paying, correspondence, financial management, and data management. Payments to Breazeale, Saunders, O'Neil are also for professional services rendered, such as FEC reporting, consulting and compliance.

In July of 2019, the primary staff accountant from Palazzo & Company performing the work for Palazzo for Congress resigned. At or around that time, Palazzo for Congress transferred all accounting functions to Breazeale, Saunders, O'Neil.

Steven Palazzo does not have any ownership in either of the above accounting firms. Since he was divorced in 2016, he does not have any current knowledge of the ownership of Palazzo & Company, LLC.

EXHIBIT 21

Palazzo For Congress
Transaction List by Vendor
All Transactions

12:19 PM
06/24/2020

Greene Acres, LLC

Type	Date	Num	Memo	Account	Clr	Split	Debit	Credit
Bill	05/14/2018		February thru April 2018 Rent	Accounts Payable		Rent		9,000.00
Bill	06/05/2018		May Rent	Accounts Payable		Rent		3,000.00
Bill	07/02/2018			Accounts Payable		Rent		3,000.00
Bill	08/02/2018			Accounts Payable		Rent		3,000.00
Bill	09/10/2018			Accounts Payable		Rent		3,000.00
Bill	10/01/2018			Accounts Payable		Rent		3,000.00
Bill	11/01/2018			Accounts Payable		Rent		3,000.00
Bill	12/01/2018			Accounts Payable		Rent		3,000.00
Bill	12/31/2018		December Rent	Accounts Payable		Rent		3,000.00
Bill	02/01/2019		January Rent - 2019	Accounts Payable		Rent		3,000.00
Bill	02/19/2019		February Rent - 2019	Accounts Payable		Rent		3,000.00
Bill	03/01/2019		March Rent - 2019	Accounts Payable		Rent		3,000.00
Bill	04/01/2019		April Rent - 2019	Accounts Payable		Rent		3,000.00
Bill	05/01/2019		May Rent - 2019	Accounts Payable		Rent		3,000.00
Bill	06/01/2019		June Rent - 2019	Accounts Payable		Rent		3,000.00
Bill	06/28/2019		July Rent - 2019	Accounts Payable		Rent		3,000.00
Bill	07/29/2019		August Rent - 2019	Accounts Payable		Rent		3,000.00
								<u>57,000.00</u>
Bill Pmt -Check	05/15/2018		February thru April 2018 Rent	Bancorp South	✓	Accounts Payable		9,000.00
Bill Pmt -Check	06/18/2018		May Rent	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	07/02/2018		June Rent	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	08/02/2018		July Rent	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	09/10/2018		August Rent	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	10/01/2018		September Rent	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	11/01/2018		October Rent	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	12/01/2018		November Rent	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	12/31/2018		December Rent	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	02/01/2019		January Rent - 2019	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	02/19/2019		February Rent - 2019	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	03/01/2019		March Rent - 2019	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	04/01/2019		April Rent - 2019	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	05/01/2019		May Rent - 2019	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	06/01/2019		June Rent - 2019	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	06/28/2019		July Rent - 2019	Bancorp South	✓	Accounts Payable		3,000.00
Bill Pmt -Check	07/29/2019		August Rent - 2019	Bancorp South	✓	Accounts Payable		3,000.00
Check	08/27/2019			Bancorp South	✓	Rent		<u>60,000.00</u>
Check	05/19/2014	2945		Bancorp South	✓	Mileage		<u>1,400.00</u>
								<u>1,400.00</u>

EXHIBIT 22

Greene Acres of Ms, LLC
c/o The Honorable Steven Palazzo

OFFICE OF CONGRESSIONAL ETHICS
WASHINGTON, DC 20515

**Re: REQUEST FOR INFORMATION
Review No. 20-2124**

- (1) Please provide (a) a summary of the business objective or mission of Greene Acres of Ms, LLC, (b) the exact address of the business and (c) the names, contact information, and title of all current and former employees of the business.

Response and Documents Attached:

Since June 24, 2009, Steven Palazzo has maintained Greene Acres, LLC as a standard business practice to own and operate fixed assets. Greene Acres, LLC, is a single owner, investment property management company. The principal address is 11530 Treelawn Drive, Gulfport, MS 39503. Steven Palazzo is the managing member and only member of Greene Acres, LLC. Greene Acres, LLC has no employees.

EXHIBIT 23

330608 **11072 Old Highway 67, D'Iberville, MS 39540** **Agent Copy**
Single Family Withdrawn

Name	Office	Primary	Office	E-mail
Listing Member: Cameron C Bell	LO: Cameron Bell Properties, Inc. 19108	[REDACTED]	228-861-5939	cameronbell [REDACTED]



List Price:	\$525,000	Sub-Type:	Single Family Residence
List Date:	02/22/2018	Days On Market:	54
Listing Type:	Exclusive Right To Sell	CDOM:	54
Bedrooms:	4	Parcel #:	1308h-03-021.000
Full Baths:	2 3	Additional Parcel:	1308H-03-021.015
Half Baths:	1	Parcel Numbers:	(.63acres) Adjacent parcel included.
Apx H/C SqFt:	3,856 (per appraisal)	Lot Dimensions:	206x338x196x384
List Price Sqft:	\$136.15	Subdivision:	Magnolia Bluff Pla
Acreage:	2.03	County:	Harrison
Year Built:	1920 (tax rolls)	Zoning:	Hwy Commercial District
Manuf./Mobile:	No	N or S of CSX RR:	N
Modular:	No	N or S of I-10:	North
		Comm. to Other:	3%
		Broker:	
		Sub Agency:	No

3856 x 137.63 = 530,701

Legal: BEG AT INTER OF N MAR OF A 30 FT R/W & SW COR OF LOT 3 OF MAGNOLIA BLUFF PLANTATION SUBD N 81.6 FT N 3 DG E 235.6 FT TO

Homestead Y/N:	No	Potential Short Sale:	No	Annual Home Ins:	
Condo/HO Fees:		Short Sale Info:		Flood Insurance Required?:	Yes
Other Condo/HO Fees:		3rd Party/Bank Owned:	No	Annual Flood Ins:	\$535
				Estimated Annual Taxes:	\$3,184

School District:	D'Iberville	Junior/Middle School:		Owner Name:	Palazzo
Elementary School:		Senior High School:		Owner/Agent:	No

Agent Remarks: Seller requests that all agents/buyers remove their shoes before entering main home. 24hr notice requested before showing.
Public Remarks: This majestic, one-of-a-kind waterfront home was built in 1920 with the character, charm and craftsmanship you won't find elsewhere! Perched on 1.4 acres atop one of the highest points along the Tchoutacabouffa River, it features stained glass windows, tiling and beautiful hard wood flooring. It is private with a garage apartment, dock, large second floor deck, courtyard (ideal for entertaining) and water views all around. Adjacent .63 acres also included. Listed under appraised value of both parcels at \$1.175 million. Zoned C-3D (Interstate Commercial District).

Showing: Call LA for Appt.	Exterior: Stucco
Type: House	Parking: Driveway; Garage Double
Levels: Two	Foundation: Other - See Remarks
Walls: Sheet Rock	Waterfront: River; Water View
Flooring: Natural Wood; Ceramic Tile	Recreation/Amenities: Boating; Near Entertainment; Swimming
Cooling System: Central Electric	Miscellaneous: 1-3 Acres; Guest Cottage
Heat System: Cent/Elec Heat Pump	Handicap:
Heat Fuel: Electric	

Water Heater: Electric
Water: Well
Sewer: Septic Tank

Approx Age Code: Older Home 25+ Years
Occupancy: Vacant
Possession: Covered in Contract
Acceptable Financing: Conventional; Other - See
Remarks

Interior Features: Ceiling Fan; Fireplace; High Ceilings; Other - See Remarks

Exterior Features: Other - See Remarks; Patio

Equipment/Appliances: Cooktop; Dishwasher; Disposal; Single Oven

Information is deemed to be reliable, but is not guaranteed. © 2018 MLS and FBS. Prepared by Tiffany J Dymond, ABR, SFR on Friday, July 13, 2018 10:55 AM. The information on this sheet has been made available by the MLS and may not be the listing of the provider.

EXHIBIT 24

From: [Cameron Bell](#)
To: [Brown, Jeffrey](#)
Subject: FW: Questions
Date: Monday, July 6, 2020 8:36:29 PM
Attachments: [image001.png](#)
[Appraisal 2016.pdf](#)

Cameron C. Bell

Realtor | Broker | Attorney*

Cameron Bell Properties, Inc.

14335 Dedeaux Road

Gulfport, MS 39503

Cell [REDACTED]

Fax (800) 520-3445

www.cameronbellproperties.com

*Not actively practicing law.

From: Cameron Bell <[REDACTED]>
Sent: Wednesday, March 29, 2017 1:14 PM
To: 'Jared Wabel' <[REDACTED]>
Subject: RE: Questions

Ever lived in? Yes, mainly used a weekend home by current owners to my knowledge.

How long vacant? Probably 6 months or so.

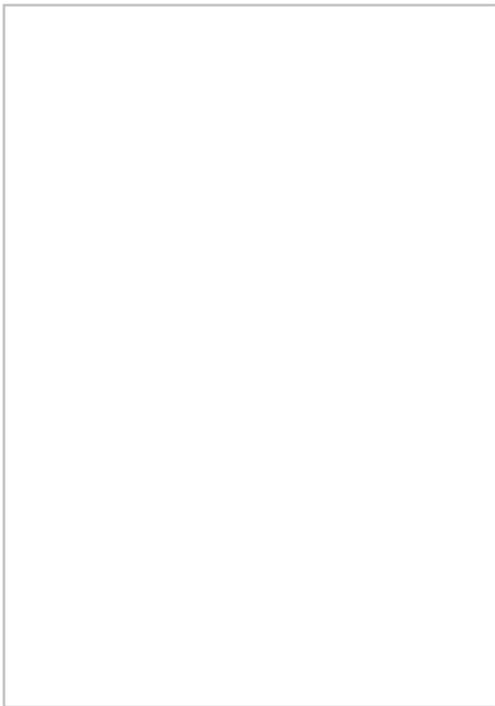
Can you send property map that shows property lines? See below for the two parcels.

Age of HVAC? Emailed disclosure via separate email. Also have inquired specifically with owner.

What does it mean leveled after Katrina? I assume it was just adjusted due to settling, but have inquired with owner.

Age of well and pump? Have inquired with owner.

Both city and well water are ran to home? Attached appraisal shows public for both, but I'm not sure... have inquired with owner.



Cameron C. Bell
Realtor | Broker | Attorney
Cameron Bell Properties, Inc.
14335 Dedeaux Road
Gulfport, MS 39503
Cell [REDACTED]
Fax (800) 520-3445
www.cameronbellproperties.com

-----Original Message-----

From: Jared Wabel [REDACTED]
Sent: Wednesday, March 29, 2017 12:59 PM
To: [Cameronbell](mailto:Cameronbell@cameronbellproperties.com) [REDACTED]
Subject: Questions

I'm driving so I'm keeping it short. Ha.

Ever lived in?
How long vacant?
Can you send property map that shows property lines?
Age of HVAC?
What does it mean leveled after Katrina?
Age of well and pump?
Both city and well water are ran to home?

Thanks

Jared

Sent from my iPhone



Virus-free. www.avg.com

EXHIBIT 25

From: [Cameron Bell](#)
To: [Brown, Jeffrey](#)
Subject: FW: Questions from potential buyer:
Date: Monday, July 6, 2020 8:33:00 PM

Cameron C. Bell

Realtor | Broker | Attorney*

Cameron Bell Properties, Inc.

14335 Dedeaux Road

Gulfport, MS 39503

Cell [REDACTED]

Fax (800) 520-3445

www.cameronbellproperties.com

*Not actively practicing law.

From: Steven Palazzo <[REDACTED]>
Sent: Tuesday, October 18, 2016 2:01 PM
To: Cameron Bell <[REDACTED]>
Subject: Re: Questions from potential buyer:

Built by the first mayor of ocean springs (Rumor) has it.

Corso family (pete) owned it after and they own Corso vending. Liz Joachim may know more.

No recollection of electrical or plumbing and Frank has owned since I believe around 2000-2002 time frame.

Owned since 2000-2002 estimated but we are trying to find settlement papers etc...

Wish I had more and I'll share as I come across.

Memo of Option to Purchase was executed on August 27, 1998 but I don't see any HUD settlement forms.

SP

From: Cameron Bell <[REDACTED]>
Date: Tuesday, October 18, 2016 at 11:44 AM
To: "Rep. Steven Palazzo" <[REDACTED]>
Subject: Questions from potential buyer:

Do we have any clue who built the home originally?

When was the last time the electrical or plumbing was updated?

How long has your family owned the home?

Thank you,
Cameron

Cameron C. Bell

Realtor | Broker | Attorney

Cameron Bell Properties, Inc.

14335 Dedeaux Road

Gulfport, MS 39503

Cell [REDACTED]

Fax (800) 520-3445

www.cameronbellproperties.com

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2016.0.7797 / Virus Database: 4664/13232 - Release Date: 10/18/16

EXHIBIT 26

From: [Cameron Bell](#)
To: [Brown, Jeffrey](#)
Subject: FW: 11072 Old Hwy 67
Date: Monday, July 6, 2020 8:32:40 PM

Cameron C Bell
Realtor I Broker I Attorney*
Cameron Bell Properties, Inc
14335 Dedeaux Road
Gulfport, MS 39503
Cell [REDACTED]
Fax (800) 520-3445

https://urldefense.proofpoint.com/v2/url?u=http-3A__www.cameronbellproperties.com&d=DwIFAw&c=L93KkjKsAC98uTvC4KvQDdTDRzAeWDDRmG6S3YXIIH0&r=YVZxpS6BS7cXGBCP7bKmUbj2uw9fdJ00rl_iz_RDN2Y&m=28RRRUjKr-AfkvbMnTcTH5MVSLeBD08En9meXJAXeEk&s=aUMH67uKhJ_7s1Fh-voLo9VPM5vs3oxq2AGfMKNKExQ&e=

*Not actively practicing law

-----Original Message-----

From: Steven Palazzo <[REDACTED]>
Sent: Tuesday, May 10, 2016 10:04 AM
To: cameronbell [REDACTED]
Subject: 11072 Old Hwy 67

Cameron,

Call Frank at [REDACTED] I'd like to have the property listed ASAP

I've asked him to be realistic on the price

Muriel will need to be there to sign the paperwork

I'll have them straighten up as much as possible

But they need to sell and sell soon hopefully

I'll call when I get to Atlanta

Sent from my iPad

No virus found in this message

Checked by AVG - https://urldefense.proofpoint.com/v2/url?u=http-3A__www.avg.com&d=DwIFAw&c=L93KkjKsAC98uTvC4KvQDdTDRzAeWDDRmG6S3YXIIH0&r=YVZxpS6BS7cXGBCP7bKmUbj2uw9fdJ00rl_iz_RDN2Y&m=28RRRUjKr-AfkvbMnTcTH5MVSLeBD08En9meXJAXeEk&s=IbCU7b2bggKFOBx8-eGsqQ0lg_qISVXfOitzYagaA8w&e=
Version: 2016.0.7690 / Virus Database: 4627/12712 - Release Date: 07/30/16

EXHIBIT 27

From: Steven Palazzo [REDACTED]
Sent: Thursday, May 11, 2017 8:01 PM
To: Cameron Bell <[REDACTED]>
Cc: Rep. Steven Palazzo <[REDACTED]>
Subject: River House and Commercial Properties

Cameron,

River House -

Please tell me what you recommend on selling this house. Ignore our conversations in the past and tell me what we can sell this property for based on your experience.

WE ARE APPARENTLY NOW PRICED APPROPRIATELY, AS THE SHOWINGS HAVE PICKED UP DRAMATICALLY. IT'S ALWAYS PRICE, TO SOME EXTENT, BUT WITH THE NUMBER OF SHOWINGS WE ARE GETTING, IT HAS BECOME SIMPLY A MATTER OF GETTING SOMEONE TO BUY INTO DOING THE UPDATES, ETC.

In addition what else are you doing to sell this property? Are you buying advertising, sending out emails to list along the coast and surrounding states? Or is it just a sign and MLS?

WE ARE ACTIVE ON OVER 70 WEBSITES, MLS, SIGNAGE, EMAILS TO ANYONE POTENTIALLY INTERESTED, WORD OF MOUTH, ETC.

Commercial Properties -

Talk with Jodi and let me know if we have the properties listed. And In addition what are you doing to sell these properties? Same questions above but with the addition are you sponsoring this on Loop net or any other commercial listing service.

I HAVE COPIED JODE' ON THIS EMAIL FOR AN UPDATED RESPONSE, BUT YES, THE PROPERTIES ARE ACTIVELY LISTED.

As you know time is of the essence for my parents to move their properties and as a realtor I expect you to be doing everything you can to sell these properties. So I look forward to reading your response.

WE ABSOLUTELY ARE, AND HAVE HAD 4-5 SHOWINGS IN THE PAST WEEK ALONE, LARGELY DUE TO THE PRICE REDUCTION.

If we need to adjust some things we will. River House being top priority. Ultimately if I'm asking too much of you then let me know and we can figure out where we go from there.

AGAIN, I BELIEVE THE LOWER THE PRICE THE MORE LIKELY IT IS TO SELL, OBVIOUSLY... HOWEVER, WITH THE NUMBER OF SHOWINGS WE'RE GETTING, IT SHOULD JUST BE A

MATTER OF TIME. THE LARGEST ISSUES/FEEDBACK PROBLEM WE ARE GETTING IS THE UNKNOWN WITH THE 12+/- ACRE SURROUNDING THE HOME.

Lastly, do you know someone that may be interested in buying the farm? I've added a \$35K tractor so that would have to be calculated into the sell price. At this time I don't want to list it but if you have any buyers in mind I will allow you to show it for in the range we discussed earlier.

YES, I HAVE SEVERAL POTENTIAL BUYERS I CAN REACH OUT TO... WHAT PRICE, INCLUDING THE 8% COMMISSION, WOULD YOU BE WILLING TO SELL IT FOR, AND ARE YOU REALLY SURE YOU WANT TO LET IT GO THIS TIME? I KNOW HOW MUCH YOU LOVE BEING OUT THERE.

Regards,

Steven



Virus-free. www.avg.com

<image001.png>

<image002.png>

<image003.png>