

**UNITED STATES HOUSE OF REPRESENTATIVES
COMMITTEE ON ETHICS
ADJUDICATORY SUBCOMMITTEE**

In the Matter of

REPRESENTATIVE SHEILA CHERFILUS-MCCORMICK,

Respondent.

NOTICE OF MOTION

MR. CHAIRMAN:

PLEASE TAKE NOTICE, that upon the annexed Memorandum and the exhibits attached thereto, the undersigned moves that the Adjudicatory Subcommittee in the above-captioned matter find the following pursuant Committee Rule 23(i) and 23(j)(2):

- (1) There is no material fact at issue with respect to all counts adopted by the Investigative Subcommittee on December 16, 2025, in the Statement of Alleged Violations (SAV) regarding Representative Sheila Cherfilus-McCormick; and
- (2) All counts in the SAV were proved by clear and convincing evidence; and
- (3) Granting such other and further relief as the Adjudicatory Subcommittee may deem just and proper.

Respectfully,



Brittney Pescatore
Sydney Bellwoar
Jennifer Seeba
Ray Rhatican
Committee on Ethics Investigative Staff

TO: Committee on Ethics Adjudicatory Subcommittee
c/o Chief Counsel and Staff Director Tom Rust

Representative Sheila Cherfilus-McCormick
c/o William Barzee, Esq.

**UNITED STATES HOUSE OF REPRESENTATIVES
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In the Matter of

REPRESENTATIVE SHEILA CHERFILUS-MCCORMICK,

Respondent.

**MEMORANDUM IN SUPPORT OF COMMITTEE’S
MOTION FOR SUMMARY JUDGMENT**

PRELIMINARY STATEMENT

Over two years ago, the Committee on Ethics (Committee) initiated a review into allegations regarding Representative Sheila Cherfilus-McCormick (Respondent).¹ The allegations were referred to an Investigative Subcommittee (ISC), which was expanded and later reauthorized for the 119th Congress.² The ISC was specifically authorized to review allegations that Respondent may have: (1) violated campaign finance laws and regulations in connection with her campaigns for the 2022 special election, the 2022 election, and/or the 2024 election; (2) failed to properly disclose required information on statements required to be filed with the House; (3) accepted voluntary services for official work from an individual not employed in her congressional office; (4) engaged in improper conduct in connection with community project funding requests; and/or (5) misused official funds for campaign purposes.³ The ISC determined there was “substantial reason to believe that a violation of the Code of Official Conduct, or of a law, rule, regulation, or other standard of conduct applicable to the performance of the official duties or the discharge of official responsibilities by a Member, officer, or employee of the House of Representatives has occurred.”⁴ Thus, on December 16, 2025, the ISC adopted a Statement of Alleged Violations charging Respondent with 27 counts of alleged violations and extensively outlining the facts upon which the charges were based (the SAV).⁵

¹ See Comm. on Ethics, Statement of the Chairman and Ranking Member of the Committee on Ethics Regarding Representative Sheila Cherfilus-McCormick (Nov. 9, 2023) (noting the matter was originally referred to the Committee on September 25, 2023), <https://ethics.house.gov/press-releases/statement-of-the-chairman-and-ranking-member-of-the-committee-on-ethics-regarding-representative-sheila-cherfilus-mccormick>.

² See Comm. on Ethics, Statement of the Chairman and Ranking Member of the Committee on Ethics Regarding Representative Sheila Cherfilus-McCormick (Jul. 25, 2025), <https://ethics.house.gov/press-releases/statement-of-the-chairman-and-ranking-member-of-the-committee-on-ethics-regarding-representative-sheila-cherfilus-mccormick-6>.

³ See Comm. on Ethics, Statement of the Chairman and Ranking Member of the Committee on Ethics Regarding Representative Sheila Cherfilus-McCormick (Jun. 25, 2024), <https://ethics.house.gov/press-releases/statement-of-the-chairman-and-ranking-member-of-the-committee-on-ethics-regarding-representative-sheila-cherfilus-mccormick-3>.

⁴ Committee Rule 19(f).

⁵ The SAV as adopted by the ISC is attached hereto as Exhibit 1 (hereinafter SAV).

Pursuant to Committee Rule 26(c), Respondent was provided with a copy of the draft SAV prior to the ISC’s vote to adopt it, as well as over 16,900 pages of materials supporting the allegations therein.⁶ Although given the opportunity to provide feedback on the draft SAV, Respondent did not do so. After the ISC voted to adopt the SAV, Respondent missed the deadline to file a Motion to Dismiss. On January 20, 2026, the day her Answer was due, Respondent submitted a “Response of Rep. Sheila Cherfilus McCormick, Motion to Dismiss, and Motion to Stay” (Respondent’s January 20, 2026, Motion) to the ISC and Adjudicatory Subcommittee (ASC). Respondent’s January 20, 2026, Motion stated that she “disputes and refutes the allegations and report of the Ethics Committee’s Investigative Subcommittee issued on December 16, 2025,” and moved the Committee “to dismiss all proceedings in this matter as there have been no substantiated grounds proving conclusive violation of the United States House of Representative Rules.” Respondent did not otherwise address the allegations in the SAV, nor did she identify any particular facts in dispute or provide contradictory evidence. The ISC did not grant Respondent’s Motion to Dismiss and the SAV was transmitted to the Committee’s Chair and Ranking Member on January 21, 2026.⁷

The ISC came to its findings after developing an extensive documentary record during its investigation. The ISC interviewed dozens of witnesses and reviewed “over 33,000 documents totaling hundreds of thousands of pages of materials.”⁸ As discussed further below, the record compiled by the ISC – and upon which the SAV relies – revealed a narrative of progressive and compounding corruption.

Respondent won her first successful election to the House after running on an “self-bought, unbossered” platform that portrayed herself as self-financing her campaign.⁹ Her apparent wealth was largely the result of a contract between her parents’ company and the state of Florida regarding COVID-19 vaccinations. The company funneled the majority of the funds it received from Florida to Respondent and/or her campaign, either directly or through various intermediaries; no evidence was produced showing why Respondent would be entitled to this money. Moreover, by intentionally waiting to file required financial disclosures for House candidates, she avoided a full accounting of her income and its sources during the competitive primary.

After winning the 2022 special election – and depleting most of the COVID funds in the process – Respondent found herself immediately having to run again and was at risk of being outraised in the first quarter by her primary opponent. She then inflated her campaign committee’s cash on hand through a mix of inaccurate reporting and a sizeable personal “loan,” which she

⁶ Respondent was provided the materials through her then-counsel, Michael Stroud of Ice Miller LLP. On January 30, 2026, Mr. Stroud withdrew as counsel. Respondent informed the Committee she had retained new counsel, William Barzee of Barzee Flores, on March 2, 2026. These materials were sent to Mr. Barzee that same day.

⁷ Under Committee Rules, “the investigative subcommittee shall rule upon any motion to dismiss filed during the period between the establishment of the subcommittee and the subcommittee’s transmittal of a report or Statement of Alleged Violation to the Committee or to the Chair and Ranking Minority Member at the conclusion of an inquiry, and no appeal of the subcommittee’s ruling shall lie to the Committee.” Committee Rule 22(1)(1). Respondent filed her Motion to Dismiss prior to the SAV being transmitted to the Committee’s Chair and Ranking Member. Committee rules therefore require the ISC to rule on Respondent’s Motion to Dismiss and the Adjudicatory Subcommittee need not consider it.

⁸ SAV Overview at p. 1.

⁹ SAV ¶ 46.

moved into and out of the campaign's bank account within a matter of days. Meanwhile, her actual campaign costs were largely shouldered by outside groups run by her friends and family. The largest source of funding used by those groups was a company called Petrogaz-Haiti S.A., LLC (Petrogaz-Haiti), which itself was funded during that period primarily by Haitian government funds.

The record also demonstrates that Respondent's misconduct was not limited to her campaign funding. Once in office, Respondent used her position to benefit allies with special favors during the appropriations process. She also disregarded restrictions on volunteer work by her senior campaign advisor for her congressional office. Finally, during the ISC's investigation, Respondent behaved with a lack of candor and diligence.

Ultimately, the evidence obtained by the ISC establishes the facts alleged in the SAV by clear and convincing evidence; these facts, in turn, prove each count in the SAV.¹⁰ Respondent has made no meaningful argument to rebut these findings in the more than two years that this matter has been ongoing.¹¹ Accordingly, the Committee's motion for summary judgment should be granted – the ASC should find (1) the facts underlying each of the 27 violations in the SAV are not in dispute and are supported by clear and convincing evidence in the record; and (2) that these facts are sufficient to find Respondent violated each count in the SAV by clear and convincing evidence.

STANDARD OF REVIEW

The ultimate purpose of an adjudicatory subcommittee hearing is to “determine whether any counts in the Statement of Alleged Violation have been proved by clear and convincing evidence and [to] make findings of fact, except where such violations have been admitted by respondent.”¹² Since 1991,¹³ the Committee has established approximately two dozen investigative subcommittees and received nine statements of alleged violations relating to various respondents. Only four prior matters have progressed to the adjudicatory subcommittee stage, with only two completed adjudicatory hearings.¹⁴ Investigative subcommittees have also been

¹⁰ Many of the counts in the SAV encompass multiple instances of the same or similar conduct. In the interests of clarity and brevity, this Memorandum does not necessarily address every single alleged incident encompassed by each count but identifies clear and convincing evidence sufficient to establish each count.

¹¹ As discussed further below, although to date Respondent has not engaged with the substance of the SAV in any communications or filings with the Committee, Respondent has given public interviews where she makes assertions about the SAV's allegations and their sufficiency. Though Respondent has not made the arguments or assertions to the Committee directly, they are addressed herein as applicable.

¹² Committee Rule 23(c).

¹³ The Ethics and Reform Act of 1989 contained provisions that mandated changes to the Committee's procedures, including “bifurcation” within the Committee of its investigative and adjudicative functions. On May 22, 1991, the Committee adopted its new rules for the 102nd Congress, including the general procedures for investigative and adjudicative subcommittees in their current form.

¹⁴ See Comm. on Ethics, *In the Matter of Representative Maxine Waters*, H. Rept. 112-690, 112th Cong. 2d. Sess. (2012) (the ASC in that matter determined to recommit the matter to the ISC); Comm. on Standards of Official Conduct, *In the Matter of Representative Charles B. Rangel*, H. Rept. 111-661, 111th Cong. 2d Sess. (2010); Comm. on Standards of Official Conduct, *In the Matter of Representative James A. Traficant, Jr.*, H. Rept. 107-594, 107th Cong. 2d Sess. (2002); Comm. on Standards of Official Conduct, *Summary of Activities, One Hundred Fifth Congress*, H. Rep. 105-848, 105th Cong. 2d Sess. 15 (1999) (*In re Rep. Newt Gingrich*).

resolved via settlements where the respondent admitted violations,¹⁵ or the loss of jurisdiction due to the resignation of the respondent.¹⁶ A respondent may also request to waive any procedural steps, including an adjudicatory hearing.¹⁷

Committee rules expressly contemplate the filing of motions in connection with an adjudicatory hearing.¹⁸ The Chair of the ASC (or other presiding member at an adjudicatory subcommittee hearing) must rule “upon any question of admissibility or relevance of evidence, non-dispositive motion, procedure, or any other matter, and may direct any witness to answer any question under penalty of contempt.”¹⁹ However, “[a] majority of the members of the subcommittee shall rule on any dispositive motions.”²⁰

At an adjudicatory hearing, the burden of proof “rests on Committee counsel to establish the facts alleged in the Statement of Alleged Violation by clear and convincing evidence.”²¹ Counsel for either the Committee or the respondent “may move the adjudicatory subcommittee to make a finding that there is no material fact at issue,” and if the adjudicatory subcommittee so finds, “the burden of proof will be deemed satisfied.”²² Under the Committee’s rules, “[a]ny relevant evidence shall be admissible unless the evidence is privileged under the precedents of the House of Representatives.”²³

ARGUMENT

The material facts alleged in the SAV are established by clear and convincing evidence, including documents and testimony collected by the ISC, as well as publicly available records.²⁴ Pursuant to Committee Rule 26(c), Respondent has been provided all materials necessary to prove the allegations discussed in the SAV, including witness transcripts, bank records, and relevant communications collected by the ISC.²⁵ The ASC has also been provided with access to the same

¹⁵ See, e.g., Comm. on Ethics, *In the Matter of Allegations Relating to Representative David Schweikert*, H. Rept. 116-465, 116th Cong., 2d Sess. (2020) (hereinafter *Schweikert*); Comm. on Ethics, *In the Matter of Allegations Relating to Representative Laura Richardson*, H. Rept. 112-642, 112th Cong., 2d Sess. (2012) (hereinafter *Richardson*).

¹⁶ See, e.g., Comm. on Ethics, Statement Regarding the Investigative Subcommittee in the Matter of Representative Jeff Fortenberry (Apr. 1, 2022), <https://ethics.house.gov/press-releases/statement-regarding-investigative-subcommittee-matter-representative-jeff-0>; Comm. on Ethics, Statement of the Chairman and Ranking Member of the Committee on Ethics Regarding Representative Duncan Hunter (Jan. 14, 2020), <https://ethics.house.gov/press-releases/statement-chairman-and-ranking-member-committee-ethics-regarding-representative-9-2>; Comm. on Ethics, Statement of the Chairwoman and Ranking Member of the Committee on Ethics Regarding Representative Blake Farenthold (Apr. 12, 2018), <https://ethics.house.gov/press-releases/statement-chairwoman-and-ranking-member-committee-ethics-regarding-representative-17>.

¹⁷ See Committee Rule 26(b).

¹⁸ See Committee Rule 23(j)(2).

¹⁹ *Id.*

²⁰ *Id.*

²¹ Committee Rule 23(o).

²² *Id.*

²³ Committee Rule 23(j)(1).

²⁴ Though only some of these materials are attached hereto as Exhibits, the “record” or “evidence” referenced herein encompasses all of the evidence previously provided to Respondent and made available to the ASC, including witness testimony and bank records.

²⁵ Consistent with Committee Rule 25, Respondent was also provided with any potentially exculpatory evidence.

materials. In many instances, the evidence on which the SAV relies is unambiguous and objective, with a clear flow of funds charted across numerous bank accounts, accompanied by contemporaneous emails and text messages. Additionally, the SAV’s allegations are supported by testimony, including direct testimony from some of the most senior people involved with Respondent’s congressional campaigns, despite many key witnesses – including Respondent – invoking their Fifth Amendment privilege against self-incrimination to avoid testifying.²⁶ The SAV does not rely on adverse inferences against those witnesses to support its charges, as the record is sufficient on its own. The 27 charged counts are a generous and conservative characterization of Respondent’s misconduct.

While Respondent’s January 20, 2026, Motion contained a conclusory assertion that she “disputes and refutes the allegations and [SAV],” this blanket denial is insufficient to raise a genuine issue of material fact regarding the factual allegations in the SAV.²⁷ Respondent’s motion did not specifically address any of the allegations in the SAV, nor identify any evidence that contradicts the assertions in the SAV.²⁸ Respondent has also not disputed the validity of any of the supporting evidence provided to her by the ISC. Nonetheless, Respondent has repeatedly claimed publicly, without providing any specific information, that the SAV “left out” information that would exonerate her.²⁹ Respondent has also publicly claimed that “I don’t even know the oil company,” referring to Petrogaz-Haiti, and the SAV “never even really show[s] that I knew any of this was going on, or if I had any relation to it going on.”³⁰ As discussed further below, these assertions are belied by the evidence, which is sufficient to show by clear and convincing evidence that Respondent knew or should have known the information requisite to prove each violation. To the extent Respondent’s statements are intended to question the sufficiency of the facts in the SAV to prove the alleged violations, the ASC should independently assess the information to arrive at its own conclusions as to Respondent’s culpability on each count.

²⁶ Notably, although Respondent invoked her Fifth Amendment right to avoid engaging directly with the Committee regarding the allegations in the SAV, these concerns have not prevented her from commencing a public media tour in which she discusses the SAV and the allegations therein. *See, e.g.*, Jackie Nespral, *NBC6 Impact: One-on-one with Congresswoman Sheila Cherfilus-McCormick*, NBC 6 News (Mar. 1, 2026) (hereinafter Respondent Media Interview), <https://www.nbcmiami.com/video/nbc-6-news/rep-sheila-cherfilus-mccormick-addresses-her-federal-charges/3770391>.

²⁷ Although not bound by the Federal Rules of Civil Procedure, the Committee Rule permitting the ASC to make a finding of “no material fact at issue” mimics the summary judgment procedure of federal civil court. Accordingly, the ASC may find F.R.C.P. 56 and its related jurisprudence instructive. *See* F.R.C.P. 56(c) (“A party asserting that a fact cannot be or is genuinely disputed must support the assertion by (A) citing to particular parts of materials in the record . . .; or (B) showing that the materials cited do not establish the absence or presence of a genuine dispute, or that an adverse party cannot produce admissible evidence to support the fact.”). While “[t]he party moving for summary judgment bears the initial burden of identifying those portions of the pleadings, discovery, and affidavits that demonstrate the absence of a genuine issue of material fact,” *Celotex Corp. v. Catrett*, 477 U.S. 317, 323, 106 S.Ct. 2548, 91 L.Ed.2d 265 (1986), conclusory denials, without more, are insufficient to preclude granting the summary judgment motion when the moving party has met its burden, *see, e.g.*, *Wai Man Tom v. Hosp. Ventures LLC*, 980 F.3d 1027, 1037 (4th Cir. 2020); *Dormu v. D.C.*, 795 F. Supp. 2d 7, 17 (D.D.C. 2011).

²⁸ Pursuant to the Amended Detailed Prehearing Filings Schedule, Respondent must produce any evidence she intends to introduce at the adjudicatory subcommittee hearing by March 20, 2026.

²⁹ *See, e.g.*, Claire Heddles and Jacqueline Charles, *Haiti Oil Money, Local Mayors Surface in New Cherfilus-McCormick Allegations*, MIAMI HERALD (Feb. 12, 2026) (“[T]he full facts will make clear I did nothing wrong.”), <https://www.msn.com/en-us/news/politics/haiti-oil-money-local-mayors-surface-in-new-cherfilus-mccormick-allegations/ar-AA1Wcnhr?ocid=BingNewsSerp>.

³⁰ *See* Respondent Media Interview.

Ultimately, the ASC should find that facts in the SAV have been established by clear and convincing evidence and should further find that, applying the relevant standards to that evidence, Respondent has in fact committed each of the alleged violations.³¹

A. Respondent and Her Campaign Accepted Impermissible Contributions from Trinity Health Care Services, LLC and/or from her Brother, Sister, and Staffer, and Failed to Properly Report Related Transactions (Counts 1-7)

Pursuant to the Federal Election Campaign Act (FECA), candidates for congressional office are subject to restrictions with respect to funds they solicit, receive, direct, transfer, and spend in connection with federal election activity.³² Moreover, a candidate's principal campaign and affiliated committees must accurately report information to the Federal Election Commission (FEC), including all loans and contributions they receive and disbursements they make.³³ According to the *House Ethics Manual (Ethics Manual)*, "a Member or employee must take reasonable steps to ensure that any outside organization over which he or she exercises control – including the individual's own authorized campaign committee or, for example, a 'leadership PAC' – operates in compliance with applicable law."³⁴ The *Ethics Manual* further states:

While FECA and other statutes on campaign activity are not rules of the House, Members and employees must also bear in mind that the House Rules require that they conduct themselves 'at all times in a manner that shall reflect creditably on the House' (House Rule 23, clause 1). In addition, the Code of Ethics for Government Service, which applies to House Members and staff, provides in ¶ 2 that government officials should '[u]phold the Constitution, laws and legal regulations of the United States and of all governments therein and never be a party to their evasion.' Accordingly, in violating FECA or another provision of statutory law, a Member or employee may also violate these provisions of the House rules and standards of conduct.³⁵

The SAV alleges, and the evidence supports, that Respondent and her campaign accepted impermissible contributions from Trinity Health Care Services, LLC (Trinity) and/or from

³¹ The SAV charges Respondent with 27 counts related to failure to uphold the laws and regulations of the United States under the Code of Ethics for Government Service, ¶ 2 and/or conduct that does not reflect creditably on the House, under House Rule XXIII, clauses 1 and/or 2. House Rule violations are only applied to conduct that occurred after Respondent was sworn in as a Member of Congress.

³² See 52 U.S.C. § 30125(e)(1)(A); see also SAV ¶¶ 285-302.

³³ 11 C.F.R. § 104.1; 52 U.S.C. § 30104(b)(3); 11 C.F.R. § 104.3.

³⁴ *House Ethics Manual* (2008) (hereinafter *2008 Ethics Manual*) at 123; *House Ethics Manual* (2022) (hereinafter *2022 Ethics Manual*) at 132.

³⁵ *2008 Ethics Manual* at 122 (internal citation omitted); *2022 Ethics Manual* at 132 (internal citation omitted).

Additionally, House Rule XXV, clause 5 prohibits House Members and staff from accepting any gift except as specifically provided in the Rule. One of the gifts that Members and staff may accept under a provision of the rule is "[a] contribution, as defined in section 301(8) of [FECA] that is lawfully made under that Act." House Rule XXV, cl. 5(a)(3)(B).

Respondent's brother, sister, and staffer, and failed to properly report the related transactions, in contravention of FECA and related regulations.

Respondent served as the Chief Executive Officer (CEO) of Trinity from 2010 until she was sworn in to Congress on January 18, 2022.³⁶ Respondent has never had an ownership interest in Trinity.³⁷ Essential Community Health Inc. (ECH) was incorporated by Respondent in November 2020.³⁸ Respondent privately indicated that she “need[ed] to roll out [her] nonprofit Essential Health” because she “will be running for Congress” and “[t]here has been some whispering going on that there may be a special election.”³⁹ In February 2021, ECH secured a contract with the Florida Division of Emergency Management (FDEM) to receive emergency funding from Florida's COVID-vaccination registration program.⁴⁰ ECH's letter to FDEM disingenuously referenced a “partnership” with Trinity and claimed ECH had “access to a diverse pool of 1200-200 employees.”⁴¹ In March 2021, an amendment was filed to that contract under Trinity's name, and the contract thereafter was run through Trinity.⁴² Approximately one week later, Trinity opened a bank account specifically for receiving and processing payments related to the FDEM contract; that same week, Respondent and her two siblings each founded a Limited Liability Company (LLC) in anticipation of being allotted a share of the FDEM funds awarded to Trinity via the LLCs.⁴³ Respondent founded SCM Consulting Group, LLC (SCM Consulting) on March 12, 2021; she was the sole manager and owned 100% of the company.⁴⁴ Respondent's brother, Edwin Cherfilus, registered The EC Firm LLC (EC Firm) on March 11, 2021.⁴⁵ Respondent was a partner in EC Firm until January 2022.⁴⁶ Respondent's sister registered MC Nursing Journey Consulting Firm LLC (MC Nursing) on March 11, 2021.⁴⁷

Trinity received its first payment from FDEM in April 2021 and its last substantial payment on September 29, 2021.⁴⁸ In total, Trinity received \$14,355,778.28 from FDEM in relation to the contract; this number includes at least \$5,778,316.45 in overpayments, with most of the overpaid funds stemming from a mistaken \$5,057,850.00 payment to Trinity in relation to an invoice charging \$50,578.50 that was deposited in Trinity's bank account on July 1, 2021.⁴⁹ Although often routed through various bank accounts first, including those in the name of Respondent, SCM

³⁶ SAV ¶ 16.

³⁷ SAV ¶ 28.

³⁸ SAV ¶ 17.

³⁹ Exhibit 2 (enclosed herein pursuant to Committee Rule 26(e)).

⁴⁰ SAV ¶¶ 18-24; Exhibit 3.

⁴¹ SAV ¶¶ 19-20; Exhibit 3.

⁴² SAV ¶¶ 22-24; Exhibit 4.

⁴³ SAV ¶¶ 26-27, 32-34.

⁴⁴ SAV ¶ 27(a).

⁴⁵ SAV ¶ 27(b).

⁴⁶ SAV ¶ 27(c)-(d).

⁴⁷ SAV ¶ 27(e).

⁴⁸ SAV ¶¶ 29, 31.

⁴⁹ SAV ¶¶ 30-31. Respondent has been charged in federal district court with the theft of government funds in connection with \$5,007,271.50 in excess payments that Trinity received as result of a clerical error by FDEM, which were at least in part used for the benefit of Respondent's campaign. However, the determination that the use of those funds for Respondent's campaign was improper does not require a finding that Trinity improperly received or retained the funds.

Consulting, EC Firm, and Edwin Cherfilus, a substantial amount of Trinity's FDEM funds ended up with Respondent or supported Respondent's campaign.

As a threshold matter, Trinity was prohibited from contributing directly to Respondent's campaign because it elected to be treated as an S-Corporation for tax purposes.⁵⁰ Nevertheless, Trinity contributed \$198,828.00 directly to Respondent's campaign.⁵¹ Some of these funds were reported to the FEC as personal loans from Respondent, which, as discussed further below, was inaccurate and improper.⁵² Approximately \$88,000.00 of the payments were not reported to the FEC at all.⁵³ Trinity's direct payments to Respondent's campaign were brazen and unquestionable violations of the limits on contribution amounts pursuant to 52 U.S.C. § 30116(a)(1)(A), as well as of 11 C.F.R. § 114.2, which prohibits corporate contributions.

In addition to the impermissible direct contributions, the SAV cites clear and convincing evidence that Trinity's funds were also funneled to Respondent's campaign through various intermediaries, including Respondent's companies, her siblings, and her current District Chief of Staff, Nadege LeBlanc. The uncontroverted bank records show that both SCM Consulting and EC Firm were funded primarily by Trinity; in 2021, nearly 85 percent of the total income received by SCM Consulting came from Trinity, and nearly 96 percent of the total income received by EC Firm came from Trinity and SCM Consulting.⁵⁴ During the 2021-2022 election cycle, EC Firm and SCM Consulting in turn transferred hundreds of thousands of dollars to Respondent's campaign – funds their accounts would not have had but for the funding from Trinity.⁵⁵ Both LLCs also transferred large sums to other entities, including Political Action Committees (PACs) and vendors, supporting Respondent's campaign. For example, SCM Consulting paid \$231,995.61 to Leadership in Action PAC, which in turn made disbursements for Respondent's campaign expenses, including its rent and the salary of its de facto campaign manager.⁵⁶ Similarly, EC Firm paid \$16,000.00 to Truth & Justice Inc., whose director, when asked what a payment from EC Firm was for, testified "it's not a payment. I would think that this is money to run the campaign."⁵⁷

The SAV also establishes that, after Trinity began transferring funds to Respondent's sister, she and Ms. LeBlanc were involved in a straw donor scheme to make excessive contributions to Respondent's campaign and that Respondent was well-aware of this scheme. The ISC's findings are based on bank records and unambiguous contemporaneous communications involving Respondent herself. Respondent's sister's personal bank account received \$50,000.00 from Trinity on June 25, 2021; the same day, she withdrew \$30,000.00 in cash and, days later, on June 28, 2021, she withdrew another \$6,000.00 in cash.⁵⁸ Also on June 28, 2021, Ms. LeBlanc deposited \$3,900.00 in cash to her personal bank account at Banking Institution 4; the next day,

⁵⁰ See Exhibit 5 (enclosed herein pursuant to Committee Rule 26(e)); 11 C.F.R. § 110.1(g); 11 C.F.R. § 114.1; 11 C.F.R. § 114.2; 26 C.F.R. § 301.7701-3.

⁵¹ SAV ¶ 104.

⁵² SAV ¶ 52.

⁵³ SAV ¶ 65.

⁵⁴ SAV ¶ 38.

⁵⁵ SAV ¶¶ 38, 85.

⁵⁶ SAV ¶¶ 109-11, 122, 151-52, 154-56, 159, 185, 187.

⁵⁷ SAV ¶ 159(b).

⁵⁸ SAV ¶ 96.

June 29, 2021, Ms. LeBlanc made a \$2,900.00 cash deposit.⁵⁹ On June 30, 2021, Ms. LeBlanc made out two checks for \$2,900.00 to Respondent’s campaign.⁶⁰ On June 30, 2021, Respondent’s campaign deposited a \$2,800.00 check from Respondent’s sister and the two checks from Ms. LeBlanc totaling \$5,800.00.⁶¹ Respondent was clearly aware of this scheme as it was being carried out, as on June 28, 2021, Respondent described the scheme in a text message to her campaign treasurer, stating: “[t]he max is 2 checks of 2900. That is why [Respondent’s sister] had to give money to Nadege for her to make another donation.”⁶²

Trinity also disbursed funds directly to Respondent so that such funds could immediately be made available to her campaign as a “personal loan” of the candidate.⁶³ Nearly every substantial transaction paid to the campaign, or for the benefit of the campaign, from Respondent’s bank accounts was preceded by a transaction from Trinity providing funds.⁶⁴ Respondent often made transfers to her campaign at or near the end of FEC reporting periods, enabling the campaign to report higher cash-on-hand numbers, and in some instances, the campaign returned the loans to Respondent within approximately a week.⁶⁵ For example, Trinity wired \$2,000,000.00 to Respondent’s personal account at Financial Institution 2 on June 23, 2021, and Respondent transferred \$2,000,000.00 to the campaign committee the next day.⁶⁶ Ultimately, in 2021, Trinity distributed at least \$2,297,360.00 to Respondent directly, excluding her regular salary.⁶⁷

In total, at least \$3,600,000.00 of the funds paid to Trinity pursuant to the FDEM contract made its way into Respondent’s campaign for at least some period of time.⁶⁸ Some of those funds have made their way back to Representative Chefilus-McCormick in the form of loan repayments – including more than \$315,000.00 of payments that were not disclosed to the FEC.⁶⁹ Additionally, while Respondent falsely reported a significant portion of the Trinity-sourced funds as personal loans or contributions from friends or family, the campaign received hundreds of thousands of dollars that can be traced back to Trinity that were not reported to the FEC at all.⁷⁰ Respondent’s campaign committee also falsely reported that she made \$493,793.56 in personal loans to her campaign that were not made; \$475,000.00 of these reported “loans” were merely a transfer from one campaign bank account to another and the remainder of the reported “loans” did not appear to exist.⁷¹ These loans were improperly reported to the FEC on some or all of at least 60 reports filed with the FEC from 2021 to 2025.⁷²

⁵⁹ SAV ¶ 97.

⁶⁰ SAV ¶ 97.

⁶¹ SAV ¶ 98.

⁶² SAV ¶ 95; *see also* Exhibit 6.

⁶³ Trinity also defrayed the campaign’s expenses by providing its own office space for campaign headquarters during the special election. SAV ¶ 198(f).

⁶⁴ SAV ¶ 51.

⁶⁵ SAV ¶ 59.

⁶⁶ SAV ¶ 51; Exhibit 7. *See also* Exhibit 8.

⁶⁷ SAV ¶ 234. Some of the funds given directly to Respondent were deposited into SCM Consulting’s bank account. SAV ¶¶ 38, 234.

⁶⁸ SAV ¶ 106.

⁶⁹ SAV ¶¶ 68, 73, 75.

⁷⁰ SAV ¶¶ 65, 95-98, 105.

⁷¹ SAV ¶¶ 56-57, 321.

⁷² SAV ¶¶ 56-57, 321.

The millions in funds that Trinity funneled into the campaign via conduits were also prohibited excessive contributions and corporate contributions, as well as violations of campaign finance laws prohibiting contributions in the name of another. Under 52 U.S.C. § 30122, “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.” FECA prohibits the use of “conduits” to circumvent its restrictions.⁷³ Both FECA and the FEC’s implementing regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution.⁷⁴ To determine who “made” a contribution for the purposes of FECA, the key issue is “the *source* of the funds, regardless of the status of the funds under state property law at the time of the donation.”⁷⁵ Additionally, “[w]hen an LLC purports to make a political contribution in close temporal proximity to its formation date, without evidence of activity or any specific information regarding the provenance of its funds, the circumstances may support a reasonable inference that the LLC was provided funds for the purpose of making a contribution, i.e., that the LLC was used as a conduit to mask the identity of the true contributor,” in light of the whole record.⁷⁶ Respondent was unable to produce a sufficient explanation for why any of the conduits utilized by Trinity were entitled to that money; while Mr. Cherfilus testified about a profit sharing agreement involving his siblings and some work he had personally done via EC Firm⁷⁷, no executed agreements or invoices were produced to the ISC to support that any of the siblings or their affiliated companies were entitled to all of the money they received from Trinity. Thus, regardless of any intermediaries used, these indirect contributions should be credited to Trinity and were therefore impermissible.

The funds that Respondent reported as “personal loans” that originated from Trinity, and to which there exists no written agreement or other basis on which to conclude she was entitled, were also impermissible corporate contributions. Candidates for federal office are generally permitted to make unlimited contributions, including loans, to their campaigns, but the funds utilized must be “personal funds.”⁷⁸ Personal funds include: (i) amounts derived from any asset that the candidate had legal right of access to or control over under applicable State law at the time the individual became a candidate, and with respect to which the candidate had “legal and rightful title” or an “equitable interest”; (ii) the candidate’s income received during the current election cycle; and (iii) certain amounts derived from joint assets owned by the candidate and the candidate’s spouse.⁷⁹

⁷³ *Goland v. United States*, 903 F.2d 1247, 1251 (9th Cir. 1990).

⁷⁴ FEC, First General Counsel’s Report, MUR 7464 (*LZP, LLC, et. al.*) (citing *U.S. v. Boender*, 649 F.3d 650, 660 (7th Cir. 2011)) (hereinafter MUR 7464) (ordinarily, in this context, “we consider the giver to be the source of the gift, not any intermediary who simply conveys the gift from the donor to the donee.”).

⁷⁵ *U.S. v. Whitemore*, 776 F.3d 1074, 1080 (9th Cir. 2015) (citing *U.S. v. O’Donnell*, 608 F.3d 546, 553-54 (9th Cir. 2010)) (emphasis original).

⁷⁶ MUR 7464.

⁷⁷ SAV ¶¶ 32, 35.

⁷⁸ See 11 C.F.R. § 110.10; 11 C.F.R. § 100.111; 11 C.F.R. § 100.52. See also FEC, Using the Personal Funds of the Candidate, <https://www.fec.gov/help-candidates-and-committees/candidate-taking-receipts/using-personal-funds-candidate>.

⁷⁹ 11 C.F.R. § 100.33.

The Committee has considered the source of personal loans in other matters by examining the transactions preceding the transfer of funds to the campaign, as well as legal agreements governing the candidates' rights to the funds and operable state law. For example, in a 2020 matter, the Committee determined that a candidate's loans that were initially transferred from a spouse's company were personal funds of the candidate because a prenuptial agreement in place years prior to the transfer gave the candidate a direct ownership interest in the company's income, a copy of which was provided to the Committee.⁸⁰ In contrast, Respondent did not have an ownership interest in Trinity and failed to produce any agreements or cite to any legal basis for asserting a right to the millions of dollars she received from Trinity, despite numerous requests from the ISC for any such record - including a subpoena.⁸¹ In the 2020 matter, the Committee also specifically considered whether the funds from the spouse's company were truly income rather than an intended campaign contribution, and found there was a history of regular transfers before and after the subject's candidacy.⁸² In contrast, Respondent had no such history of such large distributions from her parents' company. Although Respondent publicly claimed that the more than \$6 million in funds she and her companies received from Trinity in 2021 "represented years of profit-sharing that she was owed" by Trinity, the ISC received no evidence to support this assertion.⁸³

Respondent's historical salary from Trinity was \$86,000.⁸⁴ In 2021, this amount would likely qualify as her personal funds given that it would be "[a] salary or other earned income that the candidate earns from bona fide employment."⁸⁵ However, the ISC received no evidence that any additional money Respondent received directly from Trinity would qualify as her personal funds. Despite asking both Respondent and Trinity numerous times to explain Respondent's legal right to such funds, neither party provided an explanation nor identified any document indicating that Respondent was entitled to the funds. There is no evidence that Respondent was entitled to any direct Trinity funds beyond her historical salary.⁸⁶ The ISC did, however, uncover evidence that Respondent knew or should have known that such funds were not her personal funds; she had received an email from a campaign advisor on March 27, 2020, relating to campaign loans of a candidate (including the FEC's definition of personal funds).⁸⁷

Respondent did have an ownership interest in both SCM Consulting and EC Firm in 2021 and could in theory have used amounts derived from these assets in support of her campaign, assuming that these entities were not created at the same time Trinity and FDEM entered into a contract merely to act as conduits.⁸⁸ But even that argument would fail, as the ISC received no evidence that SCM Consulting itself was entitled to any of the funds it received from Trinity.⁸⁹

⁸⁰ Comm. on Ethics, *In the Matter of Allegations Relating to Representative Lori Trahan*, H. Rept. 116-451, 116th Cong. 2d Sess. 13 (2020) (hereinafter *Trahan*).

⁸¹ SAV ¶¶ 52, 107, 451.

⁸² *Trahan* at 14.

⁸³ SAV ¶ 229.

⁸⁴ SAV ¶ 227.

⁸⁵ See 11 C.F.R. § 100.33(b)(1).

⁸⁶ SAV ¶ 107. Because Respondent did not have legal title to significant sums that Trinity disbursed to her, which she then loaned to her campaign, the SAV does not rest on any conclusions as to whether Trinity unlawfully obtained or kept any portion of the funds from FDEM.

⁸⁷ Exhibit 9 (enclosed herein pursuant to Committee Rule 26(e)).

⁸⁸ See 11 C.F.R. § 100.33(a).

⁸⁹ SAV ¶¶ 35, 39, 229.

Mr. Cherfilus testified that EC Firm, through him, provided logistical support to Trinity,⁹⁰ and that EC Firm was entitled to the money it received directly from Trinity. Even accepting this as true, it does not account for all of the money that EC Firm gave to Respondent's campaign. Trinity gave \$600,000.00 to EC Firm directly; thus, Respondent would at most be entitled to \$300,000.00.⁹¹ However, EC Firm gave \$382,368.38 to Respondent's campaign in 2021.⁹² Thus, at least a portion of the funds Respondent's campaign received from EC Firm would not qualify as Respondent's personal funds. Moreover, EC Firm gave \$10,000.00 to Respondent's campaign after she entered into a separation agreement with EC Firm when she became a Member of Congress and no longer had any ownership interest.⁹³

Trinity furnished Respondent, her companies, and her siblings and associates with funds vastly exceeding applicable contribution limits and restrictions on corporate contributions. The ISC has compiled clear and convincing evidence, including based on temporal proximity, bank records showing the flow of funds, and contemporaneous communications, that these transactions were made for the purpose of directly and indirectly supporting Respondent's campaign. Respondent thereby violated 52 U.S.C. § 30116(f) by knowingly accepting excessive campaign contributions from Trinity; 11 C.F.R. § 114.2 by knowingly accepting corporate contributions; 52 U.S.C. § 30122 by accepting contributions in the name of another from Edwin Cherfilus, Respondent's sister, and Nadege LeBlanc; and 11 C.F.R. § 104.3 by falsely reporting Trinity's improper contributions (both direct and indirect) as personal loans from Respondent. Furthermore, by failing to report all loans and repayments properly, Respondent violated 11 C.F.R. § 104.3.

Respondent thus failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services. Moreover, Respondent's repeated campaign finance violations, which continued after she assumed office (during which time she received at least \$138,000 in "loan repayments" from her campaign),⁹⁴ did not reflect creditably upon the House, in violation of House Rule XXIII, clause 1.⁹⁵

B. Respondent and Her Campaign Accepted Excessive and Prohibited Campaign Contributions from Petrogaz-Haiti, Leadership in Action PAC, Haitian American Votes PAC, NHAEON, and/or NHAEON Progressive Political Action Committee, and Failed to Properly Report Related Transactions (Counts 8-12)

The SAV describes several schemes by which Respondent and those close to her made use of various organizations they controlled to funnel money for the benefit of Respondent's campaign

⁹⁰ SAV ¶ 35.

⁹¹ See SAV ¶ 38; 11 C.F.R. § 100.33(a).

⁹² SAV ¶ 85.

⁹³ SAV ¶ 86.

⁹⁴ SAV ¶ 210.

⁹⁵ See Comm. on Ethics, *In the Matter of Allegations Relating to Representative George Santos*, H. Rept. 118-274, 118th Cong. 1st Sess. (2023) (hereinafter *Santos*); Comm. on Ethics, *In the Matter of Allegations Relating to Delegate Michael F. Q. San Nicolas*, H. Rept. 117-387, 117th Cong. 2d Sess. (2022) (hereinafter *San Nicolas*); *Schweikert*; Comm. on Standards of Official Conduct, *In the Matter of Representative Earl F. Hilliard*, H. Rept. 107-130, 107th Cong. 1st Sess. (2001).

through in-kind contributions, which were not properly disclosed. The record compiled by the ISC contains clear and convincing evidence to support these counts described in the SAV.

i. Respondent's Scheme to Accept Prohibited Contributions from Petrogaz-Haiti (Count 8)

The ISC found that Respondent's campaign accepted hundreds of thousands of dollars in conduit contributions from Petrogaz-Haiti, a Florida-based company. The SAV relies on bank records showing an intricate but irrefutable trail of funds from Petrogaz-Haiti to Respondent's campaign vendors, as well as vendor invoices making clear that the payments originating from Petrogaz-Haiti and passed through the affiliate entities was specifically intended to benefit the campaign. The SAV's allegations are further supported by the timing of the transactions at issue, the individuals involved with the relevant entities (including Respondent's brother and husband), contemporaneous calendar entries and text messages, and witness testimony.

The SAV cites evidence that, on April 25, 2022, Respondent met personally with the owner of Petrogaz-Haiti and his wife in a "meet and greet" organized by Michael Joseph, the treasurer of Respondent's Leadership PAC.⁹⁶ Petrogaz-Haiti hosted a reception for Respondent later that day.⁹⁷ Four days later, on April 29, 2022, Petrogaz-Haiti contributed \$50,000.00 to Progressive People, Inc. (PPI), a newly-incorporated Florida company controlled by Respondent's husband and Mr. Joseph.⁹⁸ From April 29, 2022, to October 18, 2022, Petrogaz-Haiti and its owner transferred \$810,000.00 to PPI.⁹⁹ These funds accounted for about 89 percent of PPI's incoming funds in 2022.¹⁰⁰ PPI's remaining 2022 deposits were small, but indicate that funds given to PPI were intended to support Respondent's campaign; for example, other deposits include a check dated April 30, 2022, with the memo line "Sheila Campaign," and a June 2022 deposit erroneously identifying PPI as a "PAC."¹⁰¹

The record establishes that PPI, in turn, handed the majority of the Petrogaz-Haiti funds to Truth & Justice, Inc. (T&J), an organization associated with Respondent's senior campaign advisor, Individual 1.¹⁰² From July 2022 through the general election on November 8, 2022, PPI gave T&J \$666,000.00 over nine payments, which accounted for approximately 90 percent of its funding during this period.¹⁰³ PPI also sent T&J \$59,000.00 on November 10, 2022, two days after Respondent won the 2022 general election, bringing the total amount given to T&J to \$725,000.00.¹⁰⁴ Individual 1 personally sent at least four solicitation letters from T&J to PPI.¹⁰⁵

⁹⁶ SAV ¶¶ 178, 265; *see also* Exhibit 8.

⁹⁷ SAV ¶¶ 178, 265; *see also* Exhibit 8.

⁹⁸ SAV ¶¶ 178, 344.

⁹⁹ SAV ¶¶ 176-78. Between July and December 2021, Petrogaz-Haiti received at least \$12,500,000.00 from the Ministry of Economy and Finance of Haiti. SAV ¶ 176. The company's U.S. bank account showed no other major source of income during that period, nor in 2022. *Id.*

¹⁰⁰ SAV ¶ 177.

¹⁰¹ SAV ¶ 180.

¹⁰² SAV ¶ 168.

¹⁰³ SAV ¶ 170.

¹⁰⁴ SAV ¶ 170.

¹⁰⁵ SAV ¶ 171.

Individual 1 testified these letters were Respondent’s husband’s idea.¹⁰⁶ On December 21, 2022, PPI also gave \$20,000.00 to EC Firm, Respondent’s brother’s LLC.¹⁰⁷

The record further establishes that T&J spent a significant portion of these funds on Respondent’s campaign. T&J’s director testified the corporation was “[b]asically . . . a fund created to facilitate [Respondent’s] campaign,”¹⁰⁸ and that its funds were controlled by T&J’s director, Respondent’s campaign manager, and Individual 1.¹⁰⁹ Respondent’s campaign staff also informed individuals who wanted to contribute to Respondent’s campaign that their contributions should be provided to T&J directly.¹¹⁰ In 2022, T&J paid several vendors, individuals, and entities that provided services to Respondent’s campaign, including: \$18,000.00 to Vendor 1; \$150,288.64 to Vendor 2; \$177,500.00 to Leadership in Action PAC; \$34,460.76 to Individual 1; \$17,000.00 to Vendor 5; \$45,000.00 to Vendor 6; \$96,760.00 to Vendor 7; and \$25,000.00 to Respondent’s campaign manager.¹¹¹ Also in 2022, T&J paid \$179,773.00 to Respondent’s brother and \$49,000.00 to his LLC.¹¹² If not for Petrogaz-Haiti’s money being spent on behalf of Respondent’s campaign by PPI and T&J, the campaign would have lacked sufficient funds to pay these vendors itself.¹¹³

The SAV further notes that, after the 2022 election, Petrogaz-Haiti helped celebrate Respondent’s win. On December 13, 2022, Petrogaz-Haiti wired \$40,000.00 to a state PAC closely associated with Respondent and enabled the PAC to host Respondent’s swearing-in celebration the following month.¹¹⁴ Individual 2, who organized the swearing-in celebration, testified that the owner of Petrogaz-Haiti’s wife stayed in the “host hotel” during the event.¹¹⁵

Candidates and their authorized committees are prohibited from knowingly accepting contributions from corporations, or from LLCs which elect corporate tax treatment.¹¹⁶ LLCs which do not elect corporate tax treatment are treated as partnerships and subject to the individual contribution limits attributable to their partners.¹¹⁷ Contributions include any “gift, subscription, loan (except for a loan made in accordance with 11 CFR 100.82 and 100.83), advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.”¹¹⁸ The term “anything of value” includes “all in-kind contributions.”¹¹⁹ Moreover, “expenditures made by any person in cooperation, consultation, or concert, with, or at

¹⁰⁶ SAV ¶ 172.

¹⁰⁷ SAV ¶ 189.

¹⁰⁸ SAV ¶ 154.

¹⁰⁹ SAV ¶ 156.

¹¹⁰ SAV ¶ 181; Exhibit 10.

¹¹¹ SAV ¶¶ 182, 187.

¹¹² SAV ¶ 187.

¹¹³ SAV ¶ 346.

¹¹⁴ SAV ¶¶ 141-43.

¹¹⁵ SAV ¶ 142.

¹¹⁶ 52 U.S.C. § 30118(a); 11 C.F.R. § 114.2(d). Foreign nationals are also prohibited from contributing directly or indirectly to federal campaigns. 52 U.S.C. § 30121(a)(1)(A), (b)(1). The SAV did not make any conclusions with respect to whether the contributions from Petrogaz-Haiti should also be considered a contribution from a foreign national.

¹¹⁷ 11 C.F.R. § 110.01(g).

¹¹⁸ 11 C.F.R. § 100.52(a).

¹¹⁹ 11 C.F.R. § 100.52(d)(1).

the request or suggestion of, a candidate, his authorized political committees, or their agents, shall be considered to be a contribution to such candidate.”¹²⁰ Further, “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.”¹²¹

FECA prohibits the use of “conduits” to circumvent its restrictions.¹²² A person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution.¹²³ Under FECA, the true “contributor” is the source of funds, not “the intermediary who merely transmitted the campaign gift.”¹²⁴ The congressional purpose behind this prohibition is plain: “to ensure the complete and accurate disclosure of the contributors who finance federal elections.”¹²⁵ To determine who “made” a contribution for the purposes of FECA, the key issue is “the *source* of the funds, regardless of the status of the funds under state property law at the time of the donation.”¹²⁶ In implementing FECA’s anti-conduit provision, the FEC has looked to “the structure of the transaction itself and the arrangement between the parties to determine who in fact ‘made’ a given contribution.”¹²⁷ Whether an intermediary could have made the contribution without an infusion from the original donor is relevant to this consideration.¹²⁸ For example, “[w]hen an LLC purports to make a political contribution in close temporal proximity to its formation date, without evidence of activity or any specific information regarding the provenance of its funds,” the circumstances may support the inference that “the LLC was provided funds for the purpose of making a contribution, i.e., that the LLC was used as a conduit to mask the identity of the true contributor.”¹²⁹

Here, Petrogaz-Haiti and its owner provided \$810,000.00 to PPI weeks after PPI was founded by Respondent’s husband and Mr. Joseph, amounting to nearly 90% of PPI’s total receipts in 2022, in a series of transactions beginning days after Petrogaz-Haiti’s owner met with Respondent and Mr. Joseph and hosted a reception for Respondent.¹³⁰ PPI was evidently so closely aligned with Respondent’s campaign in 2022 that some individuals wrote checks to PPI – which PPI deposited – that identified PPI as a “PAC” or that were earmarked for “Sheila Campaign.”¹³¹ Then, throughout 2022, PPI transferred \$725,000.00, consisting almost exclusively of Petrogaz-Haiti’s money, to T&J, whose director testified it was “[b]asically . . . a fund created to facilitate [Respondent’s] campaign.”¹³² T&J, in turn, spent hundreds of thousands of dollars supporting Respondent’s campaign and defraying its expenses, amounting to contributions from Petrogaz-Haiti grossly exceeding FECA’s contribution limits.

¹²⁰ 52 U.S.C. § 30116(a)(7)(B).

¹²¹ 52 U.S.C. § 30122.

¹²² *Goland*, 903 F.2d at 1251.

¹²³ MUR 7464 (citing *Boender*, 649 F.3d at 660).

¹²⁴ *O’Donnell*, 608 F.3d at 554.

¹²⁵ *O’Donnell*, 608 F.3d at 553.

¹²⁶ *Whittemore*, 776 F.3d at 1080 (citing *O’Donnell*, 608 F.3d at 553-54) (emphasis original).

¹²⁷ MUR 7464.

¹²⁸ MUR 7464.

¹²⁹ MUR 7464.

¹³⁰ SAV ¶¶ 168, 177-78, 265, 344.

¹³¹ SAV ¶ 180. Additionally, an individual testified that the wife of Petrogaz-Haiti’s owner “talked about [] support[ing] [Respondent’s campaign] financially.” SAV ¶ 142.

¹³² SAV ¶¶ 154, 170, 344.

The facts presented in the SAV clearly and convincingly establish that Respondent’s campaign accepted unlawful in-kind contributions funneled through these outside organizations. Under the facts and circumstances established by the record, one “reasonably could infer [Respondent] knew her conduct was unauthorized and illegal.”¹³³ Here, the timing of these transactions and the chain of Respondent’s closest associates who carried them out overwhelmingly suggest PPI & T&J funneled funds from Petrogaz-Haiti to Respondent’s campaign and her associates with Respondent’s knowledge and consent, and the complex web of entities employed to make these moves suggest Respondent’s awareness of its illegality.¹³⁴ Regardless, Respondent is ultimately responsible for the conduct of her campaign even if she did not have direct knowledge of every single activity.¹³⁵

Ultimately, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC’s implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

ii. Respondent’s Scheme to Accept Excessive Contributions from Other Sources (Counts 9-12)

The SAV establishes by clear and convincing evidence that, in addition to the Petrogaz-Haiti funds passed through PPI and T&J, Respondent’s campaign also made use of other excessive funds via several closely allied organizations, including: (1) Leadership in Action PAC (LIA), a Florida state PAC led by Individual 1 and used nearly exclusively for Respondent’s 2021 and 2022 campaigns; (2) Haitian American Votes PAC (HAV PAC), a “hybrid” federal PAC chaired by Individual 2 and directed for Respondent’s benefit; (3) the National Haitian American Elected Officials Network, Inc. (NHAEON), a nonprofit chaired by Individual 2 at the time, which benefitted Respondent’s campaign in connection with a swearing-in ceremony it hosted in her honor; and (4) the NHAEON Progressive Political Action Committee (NHAEON PAC), a Florida state PAC chaired by Individual 2 for Respondent’s benefit. The record further establishes that Respondent and her closest political associates directed this web of organizations for her campaign’s benefit.

LIA was a state PAC established by Individual 1 in 2019.¹³⁶ As discussed in the SAV, during the 2021-2022 election cycle, Individual 1 controlled LIA as its executive director while he served as senior advisor and de facto campaign manager to Respondent’s campaign.¹³⁷ In 2021, LIA received just under \$303,000.00 in total contributions, nearly all of which was provided by Respondent and her associates.¹³⁸ Between May 3, 2021, and November 12, 2021, LIA received

¹³³ FEC, First General Counsel’s Report, MUR 7923 (*Schweikert*) (citing *U.S. v. Hopkins*, 916 F.2d 207, 213-15 (5th Cir. 1990)) (“It has long been recognized that ‘efforts at concealment [may] be reasonably explainable only in terms of motivation to evade’ lawful obligations”).

¹³⁴ SAV ¶ 344.

¹³⁵ 2008 *Ethics Manual* at 123; 2022 *Ethics Manual* at 132.

¹³⁶ SAV ¶ 108.

¹³⁷ SAV ¶¶ 108-11.

¹³⁸ SAV ¶¶ 110-14.

\$231,995.61 from SCM Consulting; \$25,726.64 from EC Firm; and \$12,425.00 directly from Respondent's campaign, which was later returned.¹³⁹ Some of SCM Consulting's 2021 payments to LIA were specifically earmarked for administrative items including "office items" and "office supplies."¹⁴⁰ The funds LIA received from SCM Consulting, EC Firm, and the campaign itself to make payments to vendors or otherwise for the campaign's benefit were not reported by Respondent's campaign as in-kind contributions or disbursements.

LIA also received and distributed funds from other sources linked to Respondent. In 2022 alone, LIA received \$177,500.00 from T&J, was described by its director as "[b]asically . . . a fund created to facilitate [Respondent's] campaign."¹⁴¹ Indeed, the SAV establishes that LIA's disbursements in 2021 and 2022 significantly overlapped with those of Respondent's campaign: LIA paid more than a dozen vendors and individuals who worked for Respondent's campaign, often shortly after receiving funds from SCM Consulting.¹⁴² In 2021, Individual 1, who was never paid directly by Respondent's campaign for his role as senior advisor, received over \$140,000.00 from LIA, not counting several cash withdrawals made by him.¹⁴³ In a May 3, 2021, text message, a senior campaign official informed Respondent that an \$11,500.00 payment from SCM Consulting to LIA represented "payment" and "reimbursement" to Individual 1.¹⁴⁴ LIA paid invoices addressed to Respondent's campaign and, from November 2022 through March 2023, even paid the campaign's rent.¹⁴⁵

During this time period, Individual 2, another political associate of Respondent, served as chairman of NHAEON, which describes itself as "a 501c3 non-partisan organization that engages in the education, empowerment, and political process, amplifying the voice of the Haitian-American community."¹⁴⁶ On October 2, 2020, Individual 2 registered NHAEON PAC as a state political committee in Florida.¹⁴⁷ It was not registered as a federal political committee with the FEC.¹⁴⁸ Under Respondent's supervision and control, NHAEON PAC raised and spent nonfederal funds which caused Respondent's campaign to accept excessive, unreported, in-kind contributions in violation of FECA.

The SAV cites evidence that makes clear the coordination between NHAEON PAC and Respondent's campaign, specifically showing funds going to the PAC and then being spent on behalf of Respondent's campaign. The SAV establishes that, during the 2021-2022 election cycle, Individual 2 coordinated closely with Respondent and Respondent's associates as he operated NHAEON PAC to raise and spend funds directly in support of Respondent's campaign.¹⁴⁹ Individual 2 kept Respondent and Mr. Cherfilus informed of NHAEON PAC's spending and its activities on behalf of the campaign; at this time, Mr. Cherfilus was the campaign finance director

¹³⁹ SAV ¶¶ 110-14.

¹⁴⁰ SAV ¶ 112.

¹⁴¹ SAV ¶¶ 154, 157.

¹⁴² SAV ¶ 115.

¹⁴³ SAV ¶¶ 119-20; *see also* Exhibit 11.

¹⁴⁴ SAV ¶¶ 60, 122; Exhibit 12.

¹⁴⁵ SAV ¶ 117.

¹⁴⁶ SAV ¶¶ 125-26.

¹⁴⁷ SAV ¶ 128.

¹⁴⁸ SAV ¶ 128.

¹⁴⁹ SAV ¶ 129.

and “oversaw all the money” for Respondent’s campaign. For example, on November 1, 2021, Individual 2 emailed Respondent and Mr. Cherfilus information about media buys along with an attachment describing \$16,865.00 in media costs and related expenses.¹⁵⁰ The next day, Mr. Cherfilus wired \$41,865.00 to NHAEON PAC from his personal checking account.¹⁵¹ NHAEON PAC then made payments as proposed in the document, such as a \$750.00 payment to a radio station for “Various Stations Speaking on behalf of NHAEON for Sheila.”¹⁵²

NHAEON PAC continued to make expenditures supporting Respondent’s campaign over the following weeks, including by several checks bearing the memo, “12/16/21-Promotion of Sheila S. [sic] McCormick.”¹⁵³ On December 14, 2021, Individual 2 sent Respondent and Mr. Cherfilus an email containing the wiring information for NHAEON PAC.¹⁵⁴ The same day, in an unreported transaction, Respondent’s campaign transferred \$28,000.00 to an account held by Respondent and her brother at Financial Institution 1 (the Joint Account), which then wired \$28,000.00 to NHAEON PAC.¹⁵⁵ On December 20, 2021, Individual 2 emailed Respondent and Mr. Cherfilus what Individual 2 described as the “Radio Recommended Budget,” and attached a spreadsheet listing \$50,000.00 in “Haitian Radio/Outreach” costs under the heading “January 11, 2022 General Election expenses.”¹⁵⁶ On December 21, 2021, Mr. Cherfilus wired \$50,000.00 to NHAEON PAC from his personal checking account.¹⁵⁷

NHAEON PAC was repeatedly paid amounts exceeding federal contribution limits from Respondent’s inner circle.¹⁵⁸ As described above, in 2021 alone, NHAEON PAC received nearly \$100,000.00 from Mr. Cherfilus personally. Additionally, on September 1, 2021, Respondent transferred \$10,000.00 from SCM Consulting to Finance & Fitness Consulting, LLC, a company owned by Nadege LeBlanc, Respondent’s senior campaign staffer and current District Chief of Staff.¹⁵⁹ Two days later, Finance & Fitness forwarded this sum to NHAEON PAC.¹⁶⁰

On January 10, 2022, Respondent’s sister, through her own LLC, contributed \$20,000.00 to NHAEON PAC.¹⁶¹ On February 8, 2022, NHAEON PAC sent an invoice to Mr. Cherfilus totaling \$19,966.80 for three items, including a requested \$18,441.80 “reimbursement” for a 37,000-piece mailer and \$525.00 for graphic design for an “SCM MAILER.”¹⁶² Records indicate that the \$18,441.80 mailing charge was related to mailers that were coordinated by Individual 1 and Individual 2, for the benefit of Respondent’s campaign.¹⁶³ By email to Mr. Cherfilus, Individual 2 described the invoiced amount as the “balance” owed to the PAC.¹⁶⁴

¹⁵⁰ SAV ¶ 130; *see also* Exhibit 13.

¹⁵¹ SAV ¶ 130.

¹⁵² SAV ¶ 131.

¹⁵³ SAV ¶ 132.

¹⁵⁴ SAV ¶ 133.

¹⁵⁵ SAV ¶ 133.

¹⁵⁶ SAV ¶ 134; Exhibit 14.

¹⁵⁷ SAV ¶ 134.

¹⁵⁸ SAV ¶¶ 82, 130-36.

¹⁵⁹ SAV ¶¶ 61, 100-01.

¹⁶⁰ SAV ¶ 101.

¹⁶¹ SAV ¶ 103.

¹⁶² SAV ¶ 135.

¹⁶³ SAV ¶ 135.

¹⁶⁴ SAV ¶ 136.

The SAV further alleges, and the record establishes, that after Respondent’s victory in the 2021 special election, Individual 2 caused NHAEON to organize a swearing-in celebration benefiting Respondent and her campaign. Respondent and her campaign staff coordinated closely with NHAEON to organize the event, which was held for Respondent on January 13, 2022, at the International Spy Museum in Washington, D.C.¹⁶⁵ Individual 2 testified that Respondent requested his assistance in organizing this event, and that Respondent was “specific” and “detailed” in what she wanted for the event.¹⁶⁶ On January 12, 2022, Respondent’s sister wired \$60,000.00 from her LLC to NHAEON, with the memo “4DC Reception.”¹⁶⁷ Individual 2 also sent invoices from NHAEON for event expenses to Mr. Cherfilus, and on February 8, 2022, wrote to Mr. Cherfilus “remember [Respondent’s sister] had only deposited the \$60k into the NHAEON account. Thanks!” Payments for the event’s expenses were paid primarily through NHAEON and included a \$1,877.69 video commissioned to commemorate the event, portions of which Respondent still uses on her campaign’s website.¹⁶⁸

Having used NHAEON and NHAEON PAC to win and celebrate the special election, Respondent again enlisted Individual 2 for the 2022 general election. As set forth in the SAV, HAV PAC was registered in June 2022 as a “hybrid” federal political action committee and was chaired by Individual 2.¹⁶⁹ The record shows that Individual 2 documented HAV PAC’s coordinated efforts with the campaign in 2022 through email check-ins with Mr. Cherfilus¹⁷⁰; as noted in the SAV, one of those emails corresponded directly with a significant payment from Mr. Cherfilus.¹⁷¹ On July 21, 2022, Mr. Cherfilus wired \$40,000.00 to HAV PAC from his personal checking account,¹⁷² amounting to more than half the \$75,100.00 total contributions HAV PAC reported to the FEC from its founding through September 8, 2022, its last reported receipt.¹⁷³ The next day, Individual 2 sent Mr. Cherfilus a spreadsheet titled “Revised HA[V] PAC for Sheila McCormick Buy 22.xlsx,” listing media placements in FL-20 between July 4 and July 22, 2022, totaling \$40,000.00.¹⁷⁴ Over the next week, HAV PAC wrote at least 23 checks totaling more than \$20,000.00 that directly corresponded to the spreadsheet in both recipient and amount.¹⁷⁵ The memo line on one of these checks explicitly states, “Campaign for Sheila – 2022.”¹⁷⁶ Individual 2 testified that the purpose of Mr. Cherfilus’ contribution was for Respondent’s campaign advertising.¹⁷⁷ On July 26, 2022, by an email claiming “this is directly from her campaign!,” Individual 2 placed a \$5,000.00 ad buy, the invoice for which was addressed to “Campaign to re-

¹⁶⁵ SAV ¶¶ 126-27.

¹⁶⁶ SAV ¶ 127.

¹⁶⁷ SAV ¶ 136.

¹⁶⁸ SAV ¶ 126.

¹⁶⁹ SAV ¶ 137.

¹⁷⁰ SAV ¶¶ 82, 138.

¹⁷¹ SAV ¶ 138.

¹⁷² SAV ¶ 83(c).

¹⁷³ FEC, Haitian American Votes PAC, Financial Summary, <https://www.fec.gov/data/committee/C00818088/?tab=summary>.

¹⁷⁴ SAV ¶ 139; Exhibit 15.

¹⁷⁵ SAV ¶ 139.

¹⁷⁶ SAV ¶ 139.

¹⁷⁷ SAV ¶ 139.

elect Sheila C. McCor. c/o [Individual 2],” but was ultimately paid by LIA on behalf of Respondent’s campaign.¹⁷⁸

The SAV also discussed how HAV PAC funneled further Petrogaz-Haiti funds to the benefit of Respondent. On December 13, 2022, after Respondent’s victory, Petrogaz-Haiti wired \$40,000.00 to HAV PAC.¹⁷⁹ Individual 2 testified that this contribution was for HAV PAC’s swearing-in event in Respondent’s honor in January 2023.¹⁸⁰ Between December 15, 2022, and December 21, 2022, HAV PAC made three payments by wire to vendors for the swearing-in event, totaling \$39,234.10. From December 13, 2022, through December 28, 2022, Petrogaz-Haiti was the lone depositor to HAV PAC’s checking account, and HAV PAC could not have paid the event vendors without these funds.¹⁸¹

During the 2021-2022 election cycle, individual contributions were limited to \$2,900.00 per election.¹⁸² FECA’s base contribution limits apply to “all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, including contributions which are in any way earmarked or otherwise directed through an intermediary or conduit to such candidate,” which “shall be treated as contributions from such person to such candidate.”¹⁸³ No person shall make contributions to any candidate and her authorized political committee with respect to any election for Federal office, which, in the aggregate, exceeds that person’s individual contribution limit.¹⁸⁴ The provision of any goods or services without charge or at a charge that is less than the usual and normal charge for such goods or services is a contribution.¹⁸⁵ Additionally, an expenditure made by any person,¹⁸⁶ “in cooperation, consultation or concert with, or at the request or suggestion of” a candidate or a candidate’s authorized committee (including an agent of either), is an in-kind contribution to the candidate.¹⁸⁷

Federal law prohibits candidates and officeholders from circumventing federal campaign finance restrictions by controlling ostensibly separate entities that accept and spend nonfederal funds.¹⁸⁸ As a result, federal officeholders and candidates may not raise or spend funds in connection with an election for federal office unless the funds are subject to FECA’s limitations, prohibitions, and reporting requirements.¹⁸⁹ Individuals and committees violate FECA by directing or transferring nonfederal funds in connection with a federal election.¹⁹⁰ This prohibition extends not only to federal candidates and their agents, but also precludes entities they directly or

¹⁷⁸ SAV ¶ 118; Exhibit 16.

¹⁷⁹ SAV ¶ 142.

¹⁸⁰ SAV ¶ 142.

¹⁸¹ SAV ¶ 143.

¹⁸² See FEC, Contribution Limits for 2021-2022, https://www.fec.gov/resources/cms-content/documents/contribution_limits_chart_2021-2022.pdf.

¹⁸³ 52 U.S.C. § 30116(a)(8).

¹⁸⁴ 52 U.S.C. § 30116(a)(1)(A).

¹⁸⁵ 11 C.F.R. 100.52(d)(1).

¹⁸⁶ Under FECA, a “person” includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons. 52 U.S.C. § 30101(11).

¹⁸⁷ 11 C.F.R. 109.20(a)-(b).

¹⁸⁸ FEC, First General Counsel’s Report, MUR 7853 (*Harris*) (citing *McConnell v. FEC*, 540 U.S. 93, 121, 133 (2003)).

¹⁸⁹ FEC, Advisory Opinion 2013-03 (*Bilbray-Kohn*) (citing 2 U.S.C. 441i(e)(1)(A); 11 C.F.R. 300.61).

¹⁹⁰ FEC, First General Counsel’s Report, MUR 8091 (*Harwell*) (hereinafter MUR 8091); 52 U.S.C. § 30125(e)(1)(A).

indirectly establish, finance, maintain, or control (“EFMC”), or that are acting on their behalf, from “solicit[ing], receiv[ing], direct[ing], transfer[ing], or spend[ing] funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act.”¹⁹¹ This prohibition prevents federal candidates and officeholders from “circumventing the prohibitions applying to national committees by controlling ostensibly separate entities that could accept and spend nonfederal funds.”¹⁹²

Whether an organization is EFMC’d by a candidate is determined by reference to “a non-exhaustive list of ten affiliation factors set forth in 11 C.F.R. § 300.2(c)(2),” which includes: sharing common members with an entity; providing the entity funds in a significant amount or on an ongoing basis such as through direct and indirect payments for administrative, fundraising, or other costs (or causing or arranging the same); and sharing “similar patterns of receipts or disbursements with an entity.”¹⁹³ Any one of these factors alone may or may not be sufficient to establish a group is EFMC’d by a candidate.¹⁹⁴ Whether funds provided to an entity are “significant,” and whether the receiving entity should, in turn, be considered to be EFMC’d by a candidate is determined “on a case-by-case basis and in view of all the relevant circumstances.”¹⁹⁵ Ultimately, the inquiry focuses on “the context of the overall relationship” that the candidate and her agents share with the entity.¹⁹⁶ For example, the FEC has determined “a donation of 50 percent of an organization’s total receipts would be a ‘significant amount.’”¹⁹⁷ Likewise, the FEC has determined a candidate’s combined provision individually and through an organization he controlled with his spouse of more than 60 percent of a state ballot measure committee’s receipts constituted a “significant amount.”¹⁹⁸ With respect to smaller donations, such as those amounting to 25 percent of an entity’s total receipts, the FEC has considered significant windows of time, as in its consideration of “the impact of ‘seed money’ to be important in the context of the overall relationship and the question of whether the entity was financed under [FECA].”¹⁹⁹

On the facts described above, Respondent violated these provisions prohibiting excessive contributions in federal campaigns and efforts by candidates to mask and obfuscate their campaign’s financial activities by making, causing, and condoning transfers totaling hundreds of thousands of dollars in excess, prohibited, and/or unreported contributions to her campaign. A network of groups under the close supervision of Respondent and her inner circle repeatedly accepted funds from her and her closest associates for her campaign’s direct benefit spent in excess of contribution limits, including: \$231,995.61 given from Respondent’s single-member LLC to LIA; \$25,726.64 given from EC Firm to LIA; \$177,500.00 given to LIA from T&J; \$91,865.00 given to NHAEON PAC by Respondent’s brother; \$10,000.00 Respondent personally funneled

¹⁹¹ *Id.* (citing 52 U.S.C § 30125(e)(1)(A); 11 C.F.R. § 300.61).

¹⁹² MUR 8091 (citing *McConnell*, 540 U.S. at 121, 133).

¹⁹³ MUR 8091 (citing 11 C.F.R. § 300.2(c)).

¹⁹⁴ See FEC, Conciliation Agreement, MUR 7337 (*Lesko*) (citing 11 C.F.R. § 300.2(c)(2)).

¹⁹⁵ MUR 8091 (citing FEC Advisory Opinion 2006-04 (*Tancredo*) (hereinafter AO 2006-04)).

¹⁹⁶ FEC, First General Counsel’s Report, MUR 6753 (*People for Pearce*) (hereinafter MUR 6753) (citing 11 C.F.R. § 300.2(c)(2)).

¹⁹⁷ FEC, First General Counsel’s Report, MURs 7327, 7337 & 7344 (*Lesko*, et al.) (citing AO 2006-04).

¹⁹⁸ MUR 8091 (citing FEC, First General Counsel’s Report, MUR 5367 (*Issa*)).

¹⁹⁹ MUR 8091 (citing AO 2006-04) (finding “substantial” a donation of up to \$50,000 when the entity had just a little more than \$9,000).

through her senior staffer's LLC into NHAEON PAC; \$20,000.00 given by Respondent's sister to NHAEON PAC; \$60,000.00 given by Respondent's sister to NHAEON for her swearing-in event; and \$40,000.00 given by Mr. Cherfilus to HAV PAC for expenses expressly designated for Respondent's campaign. Respondent also accepted \$1,877.69 in video production resulting in a video that still plays on her campaign website and that was paid for by NHAEON. Respondent oversaw these groups' spending on her campaign's behalf as a knowing and willing participant, contributing \$10,000.00 to NHAEON PAC through a straw donor, repeatedly receiving detailed check-ins directly and through Mr. Cherfilus from Individual 2 describing NHAEON PAC and HAV PAC's raising and spending on her behalf, and receiving a text message from her own senior campaign official informing her that a payment from her single-member LLC to LIA represented payment and reimbursement to Individual 1, her de facto campaign manager.

The facts described in the SAV, which are amply supported by the record, clearly and convincingly establish that Respondent and her campaign violated 52 U.S.C. § 30125(e)(1)(A), personally and through her agents (including Mr. Cherfilus, Individual 1, and Individual 2), by soliciting, receiving, directing, transferring, and spending nonfederal funds in connection with her campaigns for federal office. Moreover, in the "context of the overall relationship" that Respondent and her agents shared with LIA, NHAEON PAC, and HAV PAC, the facts described in the SAV clearly and convincingly establish that Respondent established, financed, managed, and controlled these entities.²⁰⁰ Having been operated in a similar pattern by Individual 1 and Individual 2 for the nearly exclusive benefit of Respondent's campaign, and each having been overwhelmingly funded by Respondent and her agents during the relevant time period, these groups were EFMC'd by Respondent, meaning any funds they solicited, received, directed, transferred, or spent in connection with Respondent's federal election were "required to be federally permissible," and Respondent's campaign was required to disclose these transactions to the FEC.²⁰¹ Instead, Respondent reaped the benefits of hundreds of thousands of dollars in nonfederal funds marshalled on her campaign's behalf and undermined the congressional purpose of FECA's provisions "to ensure the complete and accurate disclosure of the contributors who finance federal elections."²⁰²

Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1 with respect to counts 9 and 10.

C. Respondent Engaged in Additional FEC Reporting Violations, including Filing Knowingly False Reports with the FEC (Counts 13-14)

The ISC's record establishes that the required reports that Respondent's campaign filed with the FEC contained additional reporting errors not covered by the other SAV counts, ranging from technical to more fundamental. Under a single count for "additional reporting errors," the SAV charges Respondent with failing to report disbursements that were actually made; reporting

²⁰⁰ MUR 6753 (citing 11 C.F.R. § 300.2(c)(2)).

²⁰¹ MUR 8091 (citing 52 U.S.C. § 30125(e)(1)(A)); *see also* MUR 6753 (citing 2 U.S.C. § 441a(a)(1)(A)).

²⁰² *O'Donnell*, 608 F.3d at 553.

disbursements that were not made; improperly reporting disbursements; improperly reporting receipts; failing to report expenditures by Respondent as campaign expenses; failing to report in-kind contributions; and filing reports with the FEC containing those errors. For example, Respondent and her campaign improperly reported various payments, designated as loans, that the campaign received between September 29, 2021, and August 19, 2022; these errors included reporting the incorrect amount and/or date of the loan as well as improperly consolidating individual loans made on separate dates.²⁰³ Moreover, Respondent and her campaign improperly reported cash withdrawals that could not be identified as deposited in Respondent’s bank accounts as loan repayments.²⁰⁴ Additionally, a \$10,000.00 loan repayment was misreported as a \$1,000.00 loan repayment.²⁰⁵ Respondent did not take any meaningful steps to correct these reporting errors—despite knowing many of these errors existed—nor did she provide her compliance firm retained in 2024 with sufficient records or direction to make corrections.²⁰⁶

The SAV similarly consolidated the 60-some false FEC reports that Respondent’s campaign has filed, where Respondent “knew or should have known that these reports were not accurate,” as a single count of filing false reports with the FEC. As previously noted, in addition to inaccurately reported receipts and disbursements from supporters, Respondent’s campaign failed to report contributions or loans from Respondent that were actually made, reported loans from Respondent that were not made, improperly and/or inaccurately reported loans from Respondent. Even after the ISC requested information about Respondent’s loans to her campaign and identified some of the inaccuracies in the process, Respondent continued to regularly file reports with the FEC containing false information. Respondent had knowledge that at least some of the information identified as inaccurately disclosed in numerous FEC reports filed on behalf of her campaign was false.²⁰⁷ However, Respondent did not take any meaningful steps to correct these reporting errors or provide her new compliance firm with sufficient records or direction to make corrections.²⁰⁸

The professional compliance firm that Respondent hired after the Office of Congressional Conduct²⁰⁹ (OCC) began its review “did not conduct an audit of prior filings and continued to report the candidate loans as previously disclosed, without confirming that the loans were accurately reported,” and Respondent “did not direct the compliance firm to make corrections . . . despite being aware of errors.”²¹⁰ The ISC’s record suggest this was not an oversight – it “took several months” for the compliance firm to get access to active bank records and they were never provided access to older records that would have been necessary to reconcile the loan reporting.²¹¹ There was also an instance where the campaign’s reporting errors were brought to the campaign’s attention by the FEC, after a “Reason to Believe letter” led it to remove “duplicate” loans to correct

²⁰³ SAV ¶¶ 197-198.

²⁰⁴ SAV ¶ 77.

²⁰⁵ SAV ¶ 74.

²⁰⁶ See SAV ¶¶ 205-07.

²⁰⁷ See, e.g., SAV ¶¶ 59-61, 95, 124, 152; see also Exhibit 17.

²⁰⁸ See SAV ¶¶ 205-07.

²⁰⁹ At the time of the review, the Office of Congressional Conduct (OCC) was known as the Office of Congressional Ethics.

²¹⁰ SAV ¶¶ 205-07.

²¹¹ SAV ¶ 207.

its cash on hand balance²¹²; as the SAV notes, even after its amendments, the reported cash on hand was hundreds of thousands of dollars off from the actual funds the campaign had at the close of the reporting period.²¹³

A candidate's principal campaign must accurately report information to the FEC, including all loans and contributions they receive and disbursements they make.²¹⁴ "Debts and obligations owed by or to a political committee which remain outstanding shall be continuously reported until extinguished."²¹⁵ The Committee does not and should not discipline Members for every technical violation of FEC reporting requirements. For example, in a prior matter, the Committee determined to take no further action with respect to reporting errors where there was a lack of a clear legal standard from the FEC and the Member had made a good faith effort to amend inaccurate disclosures from their campaigns.²¹⁶ This matter stands in sharp contrast, as the false reports from Respondent do not reflect uncertainty about the reporting standards as much as they do indifference to them, and the attempted amendments the campaign has made were superficial and incomplete. In a recent matters, the Committee noted that the Member's failure "to take reasonable steps to prevent or correct" reporting errors, despite being made aware of concerns about the campaign's reporting practices, resulted in "the misreporting of substantial sums," and that related "poor recordkeeping" meant that the Member's campaign spending could not be verified, which "called into question the integrity of the House, contrary to clauses 1 and 6" of the Code of Official Conduct. Here, the SAV and the underlying ISC record establish clear and convincing evidence of Respondent's significant reporting errors and her personal culpability for them.

D. Respondent Engaged in Conduct Implicating Criminal Laws (Counts 15-17)

The funneling of hundreds of thousands of dollars in impermissible campaign contributions through various organizations for the benefit of Respondent's campaign was more than a mere regulatory violation. The SAV alleges, and the ISC's evidence supports, that Respondent's actions implicate federal criminal laws, including the prohibition against making false statements and the laws against money laundering.²¹⁷ While the U.S. Department of Justice has jurisdiction to determine if Respondent personally violated criminal laws, as a Member of Congress, Respondent had a duty to uphold those laws "and never be a party to their evasion."²¹⁸ The SAV sets forth clear and convincing evidence that she was in fact a party to the evasion of criminal laws.

When someone knowingly causes false reports to be filed with the FEC, they can be held to have violated 18 U.S.C. § 1001, which prohibits materially false representations to a federal agency. While it was Respondent's treasurers who had the duty to make proper disclosures to the

²¹² SAV ¶ 62.

²¹³ SAV ¶ 63.

²¹⁴ 11 C.F.R. § 104.1; 52 U.S.C. § 30104(b)(3); 11 C.F.R. § 104.3.

²¹⁵ 11 C.F.R. § 104.11(a).

²¹⁶ See *Trahan* at 19-20. The Committee has also held, however, that Members and Members-Elect have a heightened duty to ensure that payments that their campaign's receive after they are elected to Congress "are fully transparent with the public." Comm. on Ethics, *In the Matter of Allegations Relating to Representative Rashida Tlaib*, H. Rept. 116-473, 116th Congress, 2d Sess. 22 (2020).

²¹⁷ 18 U.S.C. §§ 1956-57.

²¹⁸ Code of Ethics for Government Service, ¶ 2.

FEC, Respondent contributed false and misleading information both to her initial treasurer, who had no meaningful access to the necessary financial information nor actually participated in preparation of FEC reports, as well as her subsequent treasurer, who was denied access to past data, preventing revelation of the prior false statements and causing their continued disclosure.²¹⁹

Furthermore, the SAV clearly sets forth evidence that Respondent herself transferred money between her LLC, the state PAC LIA, and her federal campaign, on top of the direct “loans” she made to her campaign, concealing the extent to which the funds Trinity obtained from FDEM was used for the benefit of her campaign.²²⁰ The evidence that she was a party to the scheme to transfer Petrogaz-Haiti’s unlawful contributions through her husband’s company and other organizations is also clear and convincing, based on the timing of her reception with Petrogaz-Haiti’s owner shortly before the scheme began, the involvement of her husband and friend, and the significant value of the funds processed through the scheme, the impact of which she could not credulously be unaware. While the SAV does not set forth sufficient evidence to assess whether Respondent was aware that the source of the funds may have been a foreign government, Respondent is not charged in the SAV with accepting foreign funds and therefore her knowledge on this point is irrelevant. Actually germane to this proceeding, the information in the SAV *does* include sufficient evidence that Respondent had reason to know Petrogaz-Haiti’s funds were excessive corporate contributions to benefit her campaign. The ASC does not need to determine if the schemes to fraudulently finance Respondent’s campaign through these transfers constitute, *e.g.*, criminal wire fraud, to determine that the transactions that sought to conceal those schemes were themselves improper.

Accordingly, there is clear and convincing evidence that Respondent was a party to the evasion of federal criminal laws prohibiting false statements and money laundering, in violation of ¶ 2 of the Code of Ethics for Government Services and House Rule XXIII, clause 1.

E. Respondent Improperly Commingled Campaign and Personal Funds (Count 18)

In addition to the general prohibition on the personal use of campaign funds, House Rule XXIII (the Code of Official Conduct) explicitly provides that a Member must keep their campaign fund “separate from the personal funds of such individual.”²²¹ As discussed in the SAV, Respondent paid for over \$100,000.00 in campaign costs directly from bank accounts belonging to her personally or to SCM Consulting without reporting those payments as loans or in-kind expenditures.²²² For example, SCM Consulting paid \$15,000.00 for the campaign’s rent, over \$94,000.00 on social media, and over \$28,000.00 to a political consulting firm.²²³ Respondent also made hundreds of thousands of dollars in payments from her personal bank account to outside organizations that were used for the benefit of her campaign, including to LIA and T&J.²²⁴

The SAV and the corresponding record thus set forth clear and convincing evidence that

²¹⁹ See, *e.g.*, SAV ¶¶ 48, 191, 207.

²²⁰ See, *e.g.*, SAV ¶¶ 110-16.

²²¹ House Rule XXIII, cl. 6(a); *see also* Comm. on Standards of Official Conduct, *In the Matter of Representative Charlie Wilson*, H. Rept. 96-930, 96th Cong. 2d. Sess. (1980).

²²² SAV ¶ 66.

²²³ SAV ¶ 66.

²²⁴ SAV ¶ 67. *See also* SAV ¶¶ 108-124, 153-189.

Respondent violated clause 6(a) of House Rule XXIII by commingling campaign and personal funds. Respondent's conduct did not reflect creditably upon the House, in violation of House Rule XXIII, clause 1, and did not adhere to the spirit or letter of the Rules of the House, in violation of House Rule XXIII, clause 2.

F. Respondent Failed to Timely File Multiple Financial Disclosure Statements and Her Filed Financial Disclosure Statements Contained Numerous Reporting Errors and Omissions (Counts 19-23)

House Rule XXVI provides, “[f]or the purposes of this rule, the provisions of title I of the Ethics in Government Act of 1978 shall be considered Rules of the House as they pertain to Members, Delegates, the Resident Commissioner, officers, and employees of the House.”²²⁵ Title I of the Ethics in Government Act (EIGA) requires annual Financial Disclosure statements (FDs) by all senior federal personnel, including all Members of the House, qualifying candidates for the House, and senior House employees.²²⁶ Members, officers, and certain employees must annually disclose personal financial interests, including investments, income, and liabilities.²²⁷ EIGA also identifies the Committee as the supervising ethics office for House Members and candidates with respect to the implementation of the financial disclosure requirements.²²⁸

Candidates for Congress are required to file an FD with the Clerk of the House within 30 days of becoming a candidate or by May 15 of the year in which they qualify as a candidate, whichever is later.²²⁹ Respondent, however, failed to file any required candidate FDs until after she had secured her primary victory in 2021. There is clear and convincing evidence that her filing omissions and delays as a candidate, and her failure to remedy them once she became a Member, were not merely inadvertent oversights. The Committee has previously noted that inadvertent errors in FDs are common and, absent evidence that errors or omissions are knowing and willful, the Committee's general practice is to notify the filer of the error and require an amendment.²³⁰ In this case, however, Respondent repeatedly flouted her disclosure obligations, even when on clear notice that she was out of compliance.

Respondent filed a Statement of Candidacy on May 23, 2018, for the 2018 general election.²³¹ She then filed two extension requests for the required Candidate FD, making her filing deadline July 29, 2018.²³² However, Respondent did not file an FD for the 2018 election.²³³

²²⁵ House Rule XXVI, cl. 2.

²²⁶ 5 U.S.C. §13103(c)-(d), (f). A qualified candidate refers to an individual that has raised or spent more than \$5,000.00 as a candidate in a campaign for election to the House of Representatives. *See id.*; *see also* Committee on Ethics, *Instruction Guide Financial Disclosure Statements and Periodic Transaction Reports Calendar Year 2021*, at 3 (hereinafter *2021 FD Guide*), https://ethics.house.gov/wp-content/uploads/2023/12/FINAL-2021-FD-Instructions_1.pdf. When an individual is a qualifying candidate, they must file an FD “within 30 days of becoming a candidate or May 15 of that year, whichever is later” and “must file no later than 30 days before any election (including primaries) in which the individual is participating.” *2021 FD Guide* at 3.

²²⁷ *2021 FD Guide* at 3; 5 U.S.C. §13104(a)-(b).

²²⁸ 5 U.S.C. §13102(a)(2).

²²⁹ *2021 FD Guide* at 3.

²³⁰ *See Trahan* at 16.

²³¹ SAV ¶ 212.

²³² SAV ¶ 212.

²³³ SAV ¶ 213.

Respondent filed a Statement of Candidacy for the 2020 general election on October 10, 2019, and her 2020 Candidate FDs were due on November 9, 2019, and May 15, 2020.²³⁴ Respondent, having already been a candidate, was aware of the requirement to file Candidate FDs. Moreover, she was also explicitly reminded of the May deadline by a senior campaign advisor on March 27, 2020, who recommended Respondent file an extension request.²³⁵ Nonetheless, she did not request any extension of her filing deadlines, nor did she file any FDs in relation to the 2020 election.²³⁶ After becoming a Member of Congress, Respondent was informed that she had not filed her Candidate FDs relating to the 2018 and 2020 elections.²³⁷ Despite this, Respondent did not file the required disclosures in violation of EIGA.²³⁸ The Committee has previously noted that “[a]ll filers are encouraged to promptly file amendments whenever they learn of errors or omissions” and “[f]ailure to do so may constitute a knowing or willful violation” of EIGA.²³⁹

Respondent declared her candidacy for a third time on December 31, 2020, for the 2022 general election; shortly thereafter, the former Representative for FL-20 passed away and a special election was announced.²⁴⁰ Respondent filed a Statement of Candidacy for the special election on June 2, 2021, and her deadline to file the required Candidate FD was July 2, 2021.²⁴¹ By this time, Respondent had already begun receiving funds from Trinity, deposited into her personal bank account, the Joint Account, and SCM Consulting’s bank account.²⁴² Respondent was aware of the requirement for candidates to file FDs but did not do so until December 22, 2021—five weeks after she was declared the winner of the Democratic primary in the 2022 special election and nearly six months after her filing deadline.

Although Respondent asserted publicly in September 2021 that “we are working on the financial disclosure form and have requested an extension in submitting it,”²⁴³ she did not in fact seek an extension. In fact, rather than seeking a lawful extension to file her FD, Respondent considered the potential ramifications of a late filing against the impact it would have on her campaign. In correspondence from November 19, 2021, between Respondent, Individual 1, and Mr. Cherfilus, Individual 1 stated, “[N]o record can be found of a candidate who’s not yet a member being disciplined for withholding the required pre-election disclosure.”²⁴⁴ The record thus demonstrates that Respondent intentionally deprived her constituents of the opportunity to review her financial interests prior to becoming the Democratic nominee by delaying her filing of her 2021 Candidate FD. The ASC should find the contemporaneous email showing that Respondent and her team specifically discussed their perception that the risk of discipline was low to be clear and convincing evidence of her willful intent, particularly when combined with her history of failing to file, as well as the aforementioned scheme to obfuscate the source of “personal

²³⁴ SAV ¶ 214.

²³⁵ Exhibit 9.

²³⁶ SAV ¶ 214.

²³⁷ SAV ¶ 220.

²³⁸ SAV ¶ 220.

²³⁹ Comm. on Ethics, *In the Matter of Allegations Relating to Representative Vernon G. Buchanan*, H. Rept. 112-588, 112th Cong. 2d Sess. 6 (2012).

²⁴⁰ SAV ¶ 215.

²⁴¹ SAV ¶ 216.

²⁴² SAV ¶ 38.

²⁴³ SAV ¶ 217; *see also Sheila Cherfilus-McCormick and Her Mystery Money*, SUN SENTINEL (Nov. 19, 2021), <https://www.sun-sentinel.com/2021/11/19/sheila-cherfilus-mccormick-and-her-mystery-money-editorial>.

²⁴⁴ SAV ¶ 217; Exhibit 18.

loans” reported by her campaign.

In addition to the failure to file in 2018 and 2020, and the delinquent 2021 Candidate FD, the SAV charges Respondent with a single count of “submitting FDs that were incomplete and inaccurate.”²⁴⁵ While a Member, Respondent has filed FDs containing numerous errors and omissions relating to earned income, assets, bank accounts, and compensation accrued for personally performed services.²⁴⁶ Some of those errors may have been technical and inadvertent, such as her failure to report certain interest bearing checking accounts, but the evidence supports a finding that several errors were intentional. Most notably, Respondent inaccurately reported income from Trinity to her and her companies, asserted the income was for “consulting fees” including “profit sharing fees” from Trinity,²⁴⁷ and misreported the value of her own companies, EC Firm and SCM Consulting.²⁴⁸ As the SAV indicates, these errors were not merely academic, but were instead the inevitable result of the large transfers of funds between Respondent, her LLCs, and her family company to benefit her congressional campaign. The willfulness of Respondent’s errors is further underscored by the significant daylight between her tax filings, bank records, and FDs.²⁴⁹ The SAV does not charge Respondent with tax evasion, as the federal government did, but the ASC does not need to find that Respondent violated tax laws to determine that she violated the transparency laws that required her to honestly and accurately disclose her finances to the public.

Respondent thus failed to uphold the laws and regulations of the United States, including provisions of EIGA, incorporated into House Rule XXVI, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services. Moreover, Respondent’s numerous, willful, and knowing FD violations did not reflect creditably upon the House, in violation of House Rule XXIII, clause 1, and did not adhere to the spirit or letter of the Rules of the House, in violation of House Rule XXIII, clause 2.²⁵⁰

G. Respondent Accepted Voluntary Services for Official Work, Including Related to Franked Communications, by Individual 1 (Counts 24-25)

While many of the SAV’s allegations are based on evidence gathered after OCC submitted its initial referral to the Committee in September 2023, the evidence that Respondent accepted voluntary services for official work, in violation of House Rules, has been clear, convincing, and available to Respondent since the first OCC referral was transmitted over two years ago.

As detailed in OCC’s referral as well as the SAV, after Respondent was sworn in on January 18, 2022, her congressional office used the services of Individual 1 from approximately

²⁴⁵ SAV ¶ 417.

²⁴⁶ SAV ¶¶ 227-36, 239-40, 242, 244 (describing inconsistencies between FD filings, tax returns, and bank records, as well as other incomplete information).

²⁴⁷ SAV ¶¶ 228-32, 234-36.

²⁴⁸ SAV ¶¶ 239-40.

²⁴⁹ SAV ¶ 230.

²⁵⁰ See *Santos* at 52 (“These were not inadvertent lapses, but major errors and omissions, and the evidence compiled by the ISC demonstrates they were knowing and willful actions as part of an ongoing ruse by Representative Santos to fabricate a wealthy persona . . .”).

January 2022 through June 2022, but he was not compensated from official funds.²⁵¹ The SAV and its supporting evidence establishes that Individual 1 was actively involved in production and airing of franked television public service announcements, mailers, emails, and radio ads from Respondent’s congressional office, and served as a go-between for the congressional office and various media outlets.²⁵² Individual 1 also assisted in other official work, including drafting Respondent’s House biography, setting Respondent’s official schedule, planning or preparing for official events, handling media requests, drafting media statements on official activities, reviewing legislative language, setting up a “mobile office,” and assessing community project funding appropriations requests.²⁵³ At no time was Individual 1 paid with funds from the Members’ Representational Allowance for the work he performed.²⁵⁴ In fact, Individual 1 testified he “volunteered” for the congressional office, and several congressional staffers understood Individual 1 to be volunteering.²⁵⁵

Respondent’s initial counsel asserted in a submission to the Committee that “[t]he newly elected Representative and her novice staff” were “caught unaware that seeking advice from a trusted individual could be construed as a violation of House Rules,” and that she was “surprise[d]” that limited volunteer efforts were prohibited.²⁵⁶ However, as described above, the services provided by Individual 1 went far beyond providing advice to Respondent’s congressional office. Moreover, Respondent knew or should have known that volunteers are not allowed to perform official work.²⁵⁷ She and her staff were informed of this rule in multiple instances. In her New Member Orientation, Respondent was informed that staff could not perform official work for free and, shortly after, in February 2022, a staffer in Respondent’s congressional office was reminded of the restriction on volunteer services by Committee staff.²⁵⁸

Under federal law, “[a]n officer or employee of the United States Government or of the District of Columbia government may not accept voluntary services for either government or employ personal services exceeding that authorized by law[.]”²⁵⁹ Under House Rule XXIII, “[a] Member . . . may not retain an employee who does not perform duties for the offices of the employing authority commensurate with the compensation such employee receives.”²⁶⁰ Under federal law, Members may not “maintain or use, directly or indirectly, an unofficial office account or defray official expenses for franked mail, employee salaries, office space, furniture, or equipment and any associated information technology services (excluding handheld communications devices) from” either “funds received from a political committee or derived from a contribution or expenditure” or “any other funds that are not specifically appropriated for official expenses.”²⁶¹ Similarly, under House Rule XXIV, “[a] Member . . . may not maintain, or have

²⁵¹ SAV ¶¶ 245-46.

²⁵² SAV ¶ 248.

²⁵³ SAV ¶ 259.

²⁵⁴ SAV ¶ 246.

²⁵⁵ SAV ¶ 249.

²⁵⁶ Exhibit 19.

²⁵⁷ SAV ¶ 248.

²⁵⁸ SAV ¶ 248.

²⁵⁹ 31 U.S.C. § 1342.

²⁶⁰ House Rule XXIII, cl. 8(a).

²⁶¹ 2 U.S.C. §§ 503(d)(1), 503(d)(3).

maintained for the use of such individual, an unofficial office account.”²⁶² This “applies to accounts maintained by third parties for a Member’s benefit, even if they are not maintained for the Member’s direct use.”²⁶³ It also applies to “any ‘process whereby funds are received or expended’ regardless of whether an actual account or repository is maintained.”²⁶⁴ Therefore, the rule prohibits private, in-kind contributions of goods or services for official purposes, with limited exceptions.²⁶⁵ House Rule XXIV also specifically prohibits the use of unofficial funds “to defray official expenses for mail or other communications, compensation for services, office space, office furniture, office equipment, or any associated information technology services (excluding handheld communications devices)”²⁶⁶ and provides, “[a] mass mailing that is otherwise frankable by a Member . . . is not frankable unless the cost of preparing and printing it is defrayed exclusively from funds made available in an appropriation Act.”²⁶⁷

The Committee has previously investigated Members for improper use of outside individuals for official services. One Member was sent a letter by the Committee noting a violation where evidence showed that a PAC employee “provided a wide array of services pertaining to the development of [the Member’s] legislative agenda, and that he did so at [the Member’s request].”²⁶⁸ Another Member was reprovved by the Committee for, among other things, “authorizing and/or accepting” scheduling and advisory services that were official in nature from an individual when they were not employed on the official staff.²⁶⁹ Consistent with this precedent, utilizing Individual 1 for official services without paying him with official funds was impermissible under both federal law and House Rules. Even if Respondent were unaware of the full scope of the prohibition on accepting volunteer services, the Committee has sanctioned other Members for impermissibly using the services of “trusted” individuals in their congressional offices, even where it determined that the violation was “unintentional.”²⁷⁰

The ISC established by clear and convincing evidence that Respondent accepted significant volunteer services from Individual 1. Respondent thus failed to uphold the laws and regulations of the United States, including provisions of EIGA, incorporated into House Rule XXVI, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services. Respondent also violated House Rule XXIV, clauses 1(a), 1(b)(2) and 6, as well as House Rule XXIII, clause 8(a). Respondent’s conduct did not reflect creditably upon the House, in violation of House Rule XXIII, clause 1, and did not adhere to the spirit or letter of the Rules of the House, in violation of House Rule XXIII, clause 2.

H. Respondent Provided Special Favors and Privileges by Directing Her Staff to Treat

²⁶² House Rule XXIV, cl. 1(a).

²⁶³ *2008 Ethics Manual* at 328; *2022 Ethics Manual* at 336.

²⁶⁴ *2008 Ethics Manual* at 328 (citation omitted); *2022 Ethics Manual* at 336 (citation omitted).

²⁶⁵ *See 2008 Ethics Manual* at 328 (citations omitted); *2022 Ethics Manual* at 336 (citations omitted).

²⁶⁶ House Rule XXIV, cl. 1(b)(2).

²⁶⁷ House Rule XXIV, cl. 6.

²⁶⁸ Comm. on Standards of Official Conduct, *Summary of Activities, One Hundred Fifth Congress*, H. Rept. 105-848, 105th Cong. 2d Sess. 15 (1999) (*In re Rep. Newt Gingrich*).

²⁶⁹ Comm. on Standards of Official Conduct, *In the Matter of Representative E.G. “Bud” Shuster*, H. Rept. 106-979, 106th Cong. 2d Sess. 3 (2000).

²⁷⁰ Comm. on Ethics, *In the Matter of Allegations Relating to Representative Luis Gutierrez*, H. Rept. 115-617, 115th Cong. 2d Sess. (2018).

Community Project Funding Requests from Individual 3 and Mr. Joseph More Favorably Than Other Submissions (Count 26)

The SAV establishes by clear and convincing evidence that two individuals received special favors and privileges from Respondent in relation to Fiscal Year 2023 Community Project Funding (CPF) requests submitted through Respondent’s congressional office.²⁷¹ As set forth in the SAV, on April 12, 2022, a legislative staffer attended a meeting with Individual 1 and Mr. Joseph.²⁷² The staffer testified she understood the purpose of the meeting was “to tell [the staffer] which projects [] had to be submitted [to] [A]ppropriations.”²⁷³ At this meeting, Mr. Joseph and Individual 1 expressed they wanted the staffer to submit six particular CPF requests to the Committee on Appropriations (Appropriations).²⁷⁴ Respondent submitted 15 CPF requests to Appropriations that year, including a project recommended by Mr. Joseph that the legislative staffer had rejected as ineligible, and which was ultimately not accepted for consideration by Appropriations.²⁷⁵ Rather than ensure that the finite number of CPF requests that her office could make included only eligible projects, Respondent chided the legislative staffer for upsetting Mr. Joseph and told the staffer to apologize to Mr. Joseph because he was her friend and “was not going anywhere.”²⁷⁶

Individual 3 was associated with Foundation 1, which submitted a CPF request for \$5,000,000.00 for tablets for telemedicine.²⁷⁷ As detailed in the SAV, Foundation 1’s CPF request was treated more favorably than others and was the only project where Respondent actively solicited the request.²⁷⁸ The legislative staffer testified “it was a priority for [Respondent] to make sure that [Foundation 1] understand the process [and] they do submit a request” and that she was not directed to reach out to anyone else regarding the CPF process.²⁷⁹ Additionally, Respondent frequently texted the legislative staffer about the CPF request and asked the legislative staffer to

²⁷¹ Some of the relevant evidence was initially collected by OCC, which found in its second referral that there was “not substantial reason to believe that [Respondent] dispensed special favors or privileges to friends in connection with community project funding,” though its investigation into that allegation only focused on Michael Joseph. *See* Office of Congressional Ethics Report and Findings for Review No. 24-7421, 20-22. However, the failure of several key individuals to cooperate with OCC’s review limited its “ability to determine whether and to what extent [Respondent] dispensed special privileges or favors to [Michael Joseph] in connection with the community project funding process.” *Id.* at 21-22. While many of the same individuals did not fully cooperate with the ISC’s investigation, with several asserting their Fifth Amendment right against self-incrimination, the ISC received clear and convincing evidence of misconduct in the form of testimony from legislative staff who worked on the CPF requests for the office and Individual 1, as well as documents from the congressional office related to the CPF process. Thus, the ISC did not adopt OCC’s finding.

²⁷² SAV ¶ 266.

²⁷³ SAV ¶ 266.

²⁷⁴ SAV ¶ 267.

²⁷⁵ SAV ¶ 274.

²⁷⁶ SAV ¶ 272.

²⁷⁷ SAV ¶ 276. OCC also reviewed allegations regarding this CPF request, specifically whether the CPF was “for an entity acting as a conduit for a for-profit entity.” *See* Office of Congressional Ethics Report and Findings for Review No. 24-7421, 9-12. The ISC did not adopt any charges relating to the allegations raised by OCC that the CPF was a “conduit” disbursement intended to benefit Individual 3’s for-profit company, rather than his non-profit foundation, as there is no prohibition on a CPF recipient using the appropriated funds to make purchases from an associated for-profit company.

²⁷⁸ SAV ¶ 277.

²⁷⁹ SAV ¶ 277.

email her the final submitted Foundation 1 CPF application.²⁸⁰ Though not used as the basis for any alleged violation, the SAV also notes that a few months after Respondent submitted Foundation 1’s CPF request, Respondent’s campaign reached out to Entity 2 – of which Individual 3 was the head – regarding using their text messaging services on behalf of the campaign; Respondent’s campaign ultimately used Entity 2’s services for at least four months in 2022 (June, July, August, and November) and again in September 2023, but has never paid for these services.²⁸¹

The Code of Ethics for Government Service provides:

Any person in government service should . . . [n]ever discriminate unfairly by the dispensing of special favors or privileges to anyone, whether for remuneration or not; and never accept, for himself or his family, favors or benefits under circumstances which might be construed by reasonable persons as influencing the performance of his governmental duties.²⁸²

In past matters where the Committee has considered whether earmarks were unfairly awarded to campaign contributors, the Committee looked at the “independent” criteria considered in processing the requests, such as jobs in a Member’s district or value to the taxpayers.²⁸³ Here, there is a clear record of staffers attempting to apply independent criteria and having it disregarded for favoritism. While the SAV contains some evidence that could support more egregious violations, there can be no question that the record has established by clear and convincing evidence that Respondent at minimum violated the prohibition on special favors and privileges by directing her staff to treat CPF requests from Individual 3 and Mr. Joseph more favorably than other submissions. Respondent instructed her staff to be proactive only about a CPF request from Individual 3 and was more invested personally in this request than the other requests.²⁸⁴ Respondent also prioritized submission of Mr. Joseph’s requests to the detriment of her district; she submitted a request that he “recommended” even though she had been warned that it “did not

²⁸⁰ SAV ¶ 278.

²⁸¹ SAV ¶¶ 276, 281-283; *see also* Exhibit 20 (admitting to this “oversight”). OCC also investigated this and found that there was “substantial reason to believe that” either Respondent’s congressional office improperly paid for the services or, “alternatively, that her campaign accepted and failed to report in-kind campaign contributions that may have exceeded applicable limits.” *See* Office of Congressional Ethics Report and Findings for Review No. 24-7421, 16-19. However, the ISC did not adopt this finding and the SAV does not contain a charge in connection with these allegations. Likewise, OCC noted that the owner of Foundation 1 and his family made the maximum allowable contributions to Respondent’s campaign and found “probable cause” that those contributions were related to the CPF, which OCC indicated would implicate criminal bribery laws and related standards of conduct. *See id.* at 12-16. The ISC did not make such a finding and the SAV does not contain a charge in connection with these allegations, instead charging only a single count of “providing special favors and privileges in connection with Community Project Funding Requests” in connection with Respondent’s favorable treatment of requests from both Individual 3 and Mr. Joseph.

²⁸² Code of Ethics for Government Service, ¶ 5.

²⁸³ Comm. on Ethics, *In the Matter of Allegations Relating to the Lobbying Activities of Paul Magliocchetti and Associates Group, Inc. (PMA)*, H. Rept. 111-423, 111th Cong. 2d Sess. 3 (2010).

²⁸⁴ *See* SAV ¶¶ 277-278.

meet the requirements,” and in doing so, cost her district the funding (and improvements) that a qualified CPF request might have been awarded.²⁸⁵

Respondent thus failed to uphold the laws and regulations of the United States, including provisions of EIGA, incorporated into House Rule XXVI, and was a party to their non-compliance, in violation of ¶¶ 2 and 5 of the Code of Ethics for Government Services. Moreover, Respondent’s conduct did not reflect creditably upon the House, in violation of House Rule XXIII, clause 1, and did not adhere to the spirit or letter of the Rules of the House, in violation of House Rule XXIII, clause 2.

I. Respondent’s Lack of Candor and Diligence in Connection with Investigation into Her Conduct Reflects Discreditably Upon the House (Count 27)

The Committee on Ethics is charged by the House with fulfilling its duty to discipline its Members under Article I, Section 5, of the U.S. Constitution. Members have a duty of candor and diligence when under investigation by the Committee.²⁸⁶ The Committee has previously found Members to be in violation of clause 1 of the Code of Official Conduct when they have acted in a manner that impeded the Committee’s investigation.²⁸⁷ Many of those matters have resulted in a sanction being imposed on the Member.²⁸⁸ For example, the Committee has noted that a Member’s efforts “to delay and impede [an investigative subcommittee’s] investigation were not only highly detrimental to the Committee’s work and the reputation of the House, they were themselves sanctionable misconduct.”²⁸⁹ Similarly, the Committee reproved a Member for interfering with its investigation, noting that “the Committee cannot perform its essential functions, which are critical to upholding the public’s trust in the institution of the House, without the full cooperation of the House Members and staff.”²⁹⁰

Clause 1 of the Code of Official Conduct (House Rule XXIII) provides that a Member “shall behave at all times in a manner that shall reflect creditably on the House.” In enforcing

²⁸⁵ See SAV ¶¶ 271, 274.

²⁸⁶ Comm. on Ethics, *In the Matter of Allegations Relating to Representative Matt Gaetz*, H. Rept. 118-943, 118th Cong. 2d Sess. 35 (2024); *Santos* at 55; *San Nicolas* at 5; *Schweikert* at 6.

²⁸⁷ See, e.g., Comm. on Ethics, *In the Matter of Allegations Relating to Representative Mike Kelly*, H. Rept. 119-218, 119th Cong. 1st Sess. 22 (2025) (hereinafter *Kelly*); *San Nicolas* at 2 (“Delegate San Nicolas did not meaningfully address the allegations against him, and chose to ignore a duly authorized subpoena rather than account for his conduct . . . the Delegate has treated the ethics process with disdain . . . [and] the ISC unanimously voted to recommend that this matter be referred to the Department of Justice.”); *Schweikert* at 5 (“Representative Schweikert violated House Rule XXIII, clause 1 by failing to exercise the proper diligence necessary in responding to the allegations”); Comm. on Ethics, *In the Matter of Allegations Relating to Representative Judy Chu*, H. Rept. 113-665, 113th Cong. 2d Sess. 15 (2014) (hereinafter *Chu*) (“Regardless of Representative Chu’s intentions, interference with a Committee investigation is a very serious matter, and Representative Chu’s actions here were clearly improper and reflected very poor judgment on her part. Thus, the Committee found that [she] violated clause 1 of House Rule XXIII”); *Richardson* at 32 (finding that “Respondent’s conduct, including her conduct after receiving notice of the Committee’s investigation, evidences a pattern of indifference or disregard for the laws, rules or regulations of the United States House of Representatives” and reprimanding the Member for her misconduct, including obstruction of the Committee’s investigation).

²⁸⁸ See, e.g., *Kelly*; *Schweikert*; *Chu*; *Richardson*.

²⁸⁹ *Schweikert* at 6 (recommending “a lesser sanction than censure, ‘due in large part of the congressman’s willingness to accept responsibility’”).

²⁹⁰ *Chu* at 14-15.

clause 1, the Committee has noted that “[c]ause 1 is a purposely subjective standard designed to ‘have a deterrent effect against improper conduct,’ and to provide ‘the ability to deal with any given act or accumulation of acts which, in the judgment of the [C]ommittee, are severe enough to reflect discredit on the Congress.’”²⁹¹ The provision serves “as a safeguard for the House as a whole.”²⁹²

Respondent initially cooperated with the ISC’s investigation and produced some documents in response to the first Request for Information (RFI) authorized by the ISC.²⁹³ However, Respondent did not produce any materials to the ISC after November 2024, despite assurances of cooperation regarding the outstanding requests in all three RFIs.²⁹⁴ After receiving no further productions, the ISC took the extraordinary step of authorizing a subpoena for documents in November 2025.

Additionally, the ISC requested Respondent conduct a voluntary interview, to which she initially agreed.²⁹⁵ Shortly before the interview, Respondent informed the ISC, through counsel, that she would no longer be available for the interview.²⁹⁶ Thereafter, on November 12, 2025, the ISC authorized a subpoena for testimony, setting a deposition for November 18, 2025 at 2:00 p.m.²⁹⁷ Respondent initially indicated she would be unable to attend the deposition because of “a Veteran’s Affairs Subcommittee hearing” scheduled for 2:00 p.m.²⁹⁸ The ISC agreed to start the deposition at 1:00 p.m. to accommodate Respondent’s schedule. Ultimately, Respondent invoked her Fifth Amendment right against self-incrimination with respect to both the documentary and testimonial subpoenas.²⁹⁹

Respondent did not treat the allegations of misconduct investigated by the ISC with sufficient seriousness. The delays in her responses to the first RFI, as well as the failure to respond to the second and third RFIs altogether, were inconsistent with the level of diligence Members owe to the Committee and caused significant delays in the ISC’s investigation. Likewise, after scheduling her voluntary interview a month in advance, Respondent canceled two days before it was to take place. After the failure to respond to the RFIs and to appear for a voluntary interview, the ISC took the extraordinary step of subpoenaing Respondent for documents and testimony. Again, Respondent waited until the day before her subpoenaed testimony to inform the ISC that she would invoke her Fifth Amendment right against self-incrimination with respect to both the documentary and testimonial subpoenas.

²⁹¹ Comm. on Ethics, *In the Matter of Allegations Relating to Representative Matt Gaetz*, H. Rept. 116-479, 116th Cong. 2d Sess. 17 (2020) (quoting *2008 Ethics Manual* at 13 (citing 114 Cong. Rec. 8778 (Apr. 3, 1968))).

²⁹² Comm. on Standards of Official Conduct, *Inquiry into the Operation of the Bank of the Sergeant-At-Arms of the House of Representatives*, H. Rept. 102-452, 102d Cong. 2d Sess. 22 (1992) (citing Comm. on Standards of Official Conduct, H. Rept. 90-1176, 90th Cong. 2d Sess. 17 (1968)).

²⁹³ SAV ¶ 450.

²⁹⁴ SAV ¶ 452.

²⁹⁵ SAV ¶ 451.

²⁹⁶ SAV ¶ 451.

²⁹⁷ SAV ¶ 451.

²⁹⁸ Email from counsel to Respondent to Committee staff (Nov. 12, 2025).

²⁹⁹ SAV ¶ 451.

Respondent did not fully cooperate with the ISC and substantially delayed and impeded the ISC's investigation. While "[a]ll respondents are entitled to invoke their constitutional rights, [] they are not entitled to provide misleading responses and engage in delay tactics."³⁰⁰ Respondent's conduct during the ISC's investigation into allegations involving her has historically been treated by the Committee as sanctionable misconduct. The facts established in the SAV with respect to Respondent's lack of candor and diligence during the ISC's investigation are proven by clear and convincing evidence and do not reflect creditably upon the House, in violation of House Rule XXIII, clause 1.

³⁰⁰ *Santos* at 55.

WHEREFORE, Committee counsel respectfully requests that, for the above reasons, an Order be made granting each of the demands in the annexed Notice of Motion, and for such other relief as may be just and proper.

Dated: Washington, D.C.
March 6, 2026

Respectfully,



Brittney Pescatore, *Director of Investigations*
Sydney Bellwoar, *Senior Counsel*
Jennifer Seeba, *Counsel*
Ray Rhatican, *Counsel*
Committee on Ethics
Room 1015, Longworth House Office Building
Washington, D.C. 20515

EXHIBIT 1

HOUSE OF REPRESENTATIVES

119TH CONGRESS

1st SESSION

COMMITTEE ON ETHICS

INVESTIGATIVE SUBCOMMITTEE

IN THE MATTER OF REPRESENTATIVE SHEILA CHERFILUS-MCCORMICK

STATEMENT OF ALLEGED VIOLATIONS

Adopted December 16, 2025

STATEMENT OF ALLEGED VIOLATIONS

For each of the following alleged violations, the Investigative Subcommittee (ISC) has determined there is “substantial reason to believe that a violation of the Code of Official Conduct, or of a law, rule, regulation, or other standard of conduct applicable to the performance of the official duties or the discharge of official responsibilities by a Member, officer, or employee of the House of Representatives has occurred.” *See* Rule 19(f), Rules of the Committee on Ethics. The ISC has been duly authorized by the U.S. House of Representatives (House) Committee on Ethics (Committee) to investigate allegations involving Representative Sheila Cherfilus-McCormick (Respondent).

OVERVIEW

- The ISC met 12 times over the 118th and 119th Congresses to conduct its investigation into allegations involving Respondent. It sent 30 requests for information and issued 59 subpoenas. The ISC reviewed over 33,000 documents totaling hundreds of thousands of pages of materials and conducted 28 witness interviews.
- Respondent initially produced some documents to the ISC. Respondent then invoked her Fifth Amendment right against self-incrimination following receipt of a subpoena *duces tecum* to obtain documents Respondent had not provided to the ISC and a subpoena *ad testificandum* to obtain her testimony.
- Respondent and several alleged co-conspirators were indicted on November 19, 2025, on charges including “stealing federal disaster funds, laundering the proceeds, and using the money to support her 2021 congressional campaign.”
- The ISC’s investigation has revealed substantial evidence of conduct consistent with the allegations in the indictment, as well as more extensive misconduct as laid out in the following Statement of Facts in Support of Alleged Violations related to violations of federal laws and regulations, as well as ethical standards. Therefore, the ISC is bringing the charges described herein against Respondent, including those related to:
 - Campaign Finance Laws and Regulations: excessive contributions from multiple individuals and entities, corporate contributions, illegal conduit contributions, and systemic reporting violations.
 - Criminal Laws Implicated by Campaign Finance Misconduct: money laundering of government funds improperly retained by Trinity Health Care Services, LLC, and of illegal campaign contributions originating from Petrogaz-Haiti S.A., LLC, and false statements on reports filed with the Federal Election Commission.
 - Ethics in Government Act: failure to file, and knowing and willful filing of inaccurate information on, required Financial Disclosure Statements.

- Code of Ethics for Government Service: provision of special favors in connection with government appropriations for community project funding requests, and failure to uphold the laws and regulations of the United States.
- House Rule XXIV: defraying official costs relating to communications expenses and services, and for franked communications, through the use of impermissible voluntary services.
- House Rule XXIII: commingling personal and campaign funds, conduct that does not reflect creditably upon the House, and conduct that does not adhere to the spirit and/or letter of the Rules of the House and federal laws.

STATEMENT OF FACTS IN SUPPORT OF ALLEGED VIOLATIONS

I. UNSUCCESSFUL CONGRESSIONAL CAMPAIGNS

1. Prior to her election to Congress, Respondent unsuccessfully campaigned to serve as the United States House Representative for Florida's 20th congressional district (FL-20) in 2018 and 2020. During those campaign cycles, she struggled to raise enough funds to be competitive, failed to file required reports with the Federal Election Commission (FEC), and the reports she did file contain numerous inaccuracies. Respondent's compliance failures during those cycles were the subject of routine inquiries from the FEC but generally drew little public attention.

A. 2018 Election

2. Respondent filed a Statement of Candidacy for the 2018 election for FL-20 on May 23, 2018.
3. Respondent's campaign committee, Sheila Cherfilus-McCormick for Congress, Inc., reported to the FEC that during the 2017-2018 election cycle, the campaign committee received \$39,740.27 in total receipts, including \$7,450.00 in loans from Respondent between July and August 2018. Respondent's campaign committee also reported that she did not receive any loan repayments from the campaign.
4. On its Statement of Organization filed with the FEC, Respondent's campaign reported having an account at Financial Institution 5. Respondent did not produce records corresponding to a campaign account from Financial Institution 5. Financial Institution 5 confirmed that Respondent did not have a campaign account with Financial Institution 5, she only had a personal account that was closed in 2020.
5. Respondent's campaign did have an account at Financial Institution 1 during this period, and some of the reported receipts and disbursements correspond to activity in that account. There are, however, numerous discrepancies between the campaign's bank account at Financial Institution 1 and FEC reports for the cycle, and the campaign failed to file reports at all for

several reporting periods. The FEC sent multiple Requests for Additional Information to the campaign, but the campaign did not file any responses.

6. The ISC was unable to confirm the source of many of the campaign's reported receipts during this period. Bank records suggest that the reported loans from Respondent may have come from cash deposits.
7. Respondent lost the 2018 FL-20 Democratic primary to the incumbent, Representative Alcee Hastings, on August 28, 2018, by more than 47 percent of the vote.

B. 2020 Election

8. On October 10, 2019, Respondent filed a Statement of Candidacy to run in the 2020 general election.
9. Respondent's campaign committee reported to the FEC that during the 2019-2020 election cycle, the campaign committee received \$69,835.47 in total receipts, including a \$50,000.00 loan from Respondent on March 15, 2020. Respondent's campaign committee also reported she did not receive any loan repayments from the campaign.
10. Respondent's campaign committee continued to report having an account at Financial Institution 5 to the FEC but had in fact opened a new account at Financial Institution 1 for the 2020 election; some of the reported receipts and disbursements correspond to activity in that account. There are, however, numerous discrepancies between the campaign's bank account at Financial Institution 1 and FEC reports for the cycle, and the campaign failed to file reports at all for several reporting periods. The FEC sent multiple Requests for Additional Information to the campaign, but the campaign did not file any responses.
11. Bank records do not show a \$50,000.00 transfer from Respondent's personal funds on March 15, 2020, as was reported in the campaign's FEC filings. Instead, bank records indicate that Respondent received \$50,000.00 from a bank account in the name of her husband's law firm at Financial Institution 8 on March 31, 2020 (the last day of the quarterly reporting period), then transferred those funds to the campaign committee on the same date. On April 6, 2020, a \$50,000.00 cashier's check from the campaign committee was deposited into Respondent's personal bank account at Financial Institution 2. On April 9, 2020, Respondent wrote a \$50,000.00 check to her husband from her personal bank account at Financial Institution 2, which was deposited into a separate account for his law firm at Financial Institution 1. The \$50,000.00 contribution and repayment were not reported to the FEC.
12. Bank records indicate that Respondent received another \$50,000.00 to her personal bank account at Financial Institution 2 from her husband's law firm's account at Financial Institution 1 on June 30, 2020. The same day, Respondent took out a \$50,000.00 cashier's check from her account, which was then cashed by the campaign committee on July 1, 2020. The \$50,000.00 contribution was not reported to the FEC.
13. There is no limit on how much money a candidate can donate or loan to their own campaign,

but those funds must be “personal funds” of the candidate. Personal funds are defined under the Federal Election Campaign Act (FECA) as the candidate’s income and assets to which the candidate “had legal right of access to or control over” and “legal and rightful title or an equitable interest.” Respondent is not a partner in her husband’s law firm and is not an authorized user of the firm’s bank accounts. Respondent did not provide the ISC with any information demonstrating her legal title to or interest in the funds held in the law firm’s accounts.

14. Respondent’s husband testified that he was not aware of any limits on how much money he could contribute to Respondent’s campaign and was not sure if he made any contributions during the 2020 election.
15. Respondent again lost the 2020 FL-20 Democratic primary to the incumbent, Representative Hastings, on August 18, 2020, by more than 38 percent of the vote.

II. FLORIDA DIVISION OF EMERGENCY MANAGEMENT CONTRACT

A. Awarding of Contract

16. Trinity Health Care Services, LLC, formerly Trinity Health Care Services, Inc., (Trinity) was co-founded by Respondent’s mother and stepfather in 1994; they converted the corporation to a Limited Liability Company (LLC) in 2016. Respondent has represented publicly and in her Financial Disclosure Statements (FDs) filed with the House that she served as the Chief Executive Officer (CEO) of Trinity from 2010 until she was sworn in to Congress on January 18, 2022.
17. Essential Community Health Inc. (ECH) was incorporated by Respondent in Florida on November 30, 2020. Respondent served as ECH’s registered agent, incorporator, and President. The Articles of Incorporation state ECH was a “coalition of women dedicated to combating health inequality through service and advocacy.” Despite publicly portraying itself as a non-profit, ECH did not obtain tax-exempt status from the Internal Revenue Service.
18. Respondent submitted a two-page proposal for ECH to join Florida’s COVID vaccination registration program via a letter to the then-Deputy Director of the Florida Division of Emergency Management (FDEM), written on ECH letterhead and dated February 24, 2021 (ECH Letter). At that time, FDEM was seeking to deploy emergency funding to increase vaccine registration in minority communities, through no-bid, noncompetitive contracting.
19. The ECH Letter referenced a “partnership” with its “parent company Trinity Health Care Services” and claimed that “[b]oth entities are owned and operated by black women and seat more than 12 women of color on their board of directors.” The ECH Letter also claimed that “[w]e have access to a diverse pool of 1200-2000 employees throughout Broward and Dade Counties.” The ECH Letter was signed by Respondent in her capacity as “Co-Founder” of ECH.
20. Two ECH board members, including the other co-founder, testified that they were unaware

that ECH had engaged in any activities and testified that the characterization of ECH in the letter to FDEM was not consistent with their understanding of the organization. ECH's co-founder testified, "[Respondent] said the [COVID] contracts were for Trinity" and had "nothing to do with [ECH]."

21. The ECH Letter proposed a scope of work and rates for its employees, which were delineated by employee title. The ECH Letter was digitally signed by the FDEM Deputy Director on February 27, 2021, indicating that FDEM had accepted ECH's proposed terms.
22. On March 4, 2021, Respondent sent an addendum to FDEM, this time on Trinity letterhead and signed by her in her capacity as CEO of Trinity (Trinity Letter). The Trinity Letter proposed the same scope of work as the ECH Letter, but the proposed rates of pay included different employee titles, with some overlap, and generally higher rates of pay compared to the ECH Letter.
23. The Trinity Letter was digitally signed by the FDEM Deputy Director on March 4, 2021, indicating that FDEM had accepted Trinity's addendum.
24. FDEM viewed ECH and Trinity as the same company. FDEM publicly reported only Trinity as the vendor for all purchase orders related to the contract. Additionally, invoices sent to FDEM were on Trinity letterhead and payments from FDEM were sent to a bank account registered only in Trinity's name.
25. ECH was administratively dissolved on September 24, 2021, because its annual report was not filed.

B. Family Companies

26. A few days after Trinity's addendum was accepted by FDEM in early March 2021, Trinity opened a new account at Financial Institution 1 for receiving and processing FDEM payments. Respondent and her brother were authorized signatories for the new Financial Institution 1 account, along with two other individuals.
27. Respondent and her two siblings each founded an LLC that same week.
 - a. SCM Consulting Group, LLC (SCM Consulting) was registered by Respondent on March 12, 2021, to provide business and healthcare consulting. Respondent served as SCM Consulting's registered agent and sole manager, owning 100% of the company.
 - b. The EC Firm LLC (EC Firm) was registered by Edwin Cherfilus, Respondent's brother, on March 11, 2021, to provide business consulting. Mr. Cherfilus was listed on EC Firm's founding documents, filed with the state of Florida, as its registered agent and sole manager.
 - c. A partnership agreement purportedly executed on March 10, 2021, states that

Respondent and Mr. Cherfilus were “partners” in EC Firm and that “[p]rofits and losses will be distributed to the partners according to their proportional interest in the LLC.” The agreement does not explicitly delineate the ownership interest of either partner, but Mr. Cherfilus testified that Respondent had a 50% ownership interest until she was sworn into Congress in 2022. Under the partnership agreement, Mr. Cherfilus served as the managing partner, had “the primary responsibility for the management of the day-to-day operations of the LLC,” and made the only initial capital contribution to EC Firm. Respondent asserts in her FDs that she was a Member of EC Firm with a 50% ownership interest in 2021.

- d. In 2022, Respondent and Mr. Cherfilus entered into a separation agreement, effective January 1, 2022 (the Separation Agreement), which ended Respondent’s 50% ownership of the company.
 - e. MC Nursing Journey Consulting Firm LLC (MC Nursing) was registered by Respondent’s sister on March 11, 2021.
28. Respondent was the CEO of Trinity and Mr. Cherfilus was the Vice President of Operations at the time the FDEM contract was awarded. Mr. Cherfilus testified that neither he nor Respondent had any ownership interest in Trinity.

C. FDEM Funds Received by Trinity

29. Over the course of its contract with FDEM, Trinity invoiced FDEM for services performed and FDEM paid Trinity based on those invoices. Trinity received its first payment from FDEM in April 2021.
30. Throughout 2021, FDEM mistakenly overpaid Trinity on several invoices, resulting in a total overpayment amount of at least \$5,778,316.45. The largest single overpayment to Trinity was approximately \$5,000,000.00 in connection with an invoice for \$50,578.50. Instead of sending Trinity the invoiced \$50,578.50, FDEM erroneously sent Trinity a payment of \$5,057,850.00, which was 100 times the invoiced amount. This payment was deposited in Trinity’s bank account on July 1, 2021.
31. Trinity received its last substantial payment from FDEM on September 29, 2021. Including the overpayments, Trinity received \$14,355,778.28 from FDEM over the course of the contract.
32. Respondent produced an undated, unexecuted copy of a “Revenue Sharing Agreement” between SCM Consulting, EC Firm, and MC Nursing in relation to the FDEM funds received by Trinity; Trinity was not included as a party to this agreement. Mr. Cherfilus testified that he worked with Respondent and Respondent’s sister to prepare the document at the beginning of the FDEM contract, and that he believed an agreement was ultimately executed, although he could not confirm whether the draft version produced to the ISC contained the terms as executed. He further testified that Respondent had not decided to run for Congress at the time the agreement was prepared, despite the fact that she had filed her Statement of Candidacy

and explicitly communicated her intent to run in an email to him before Trinity even obtained the FDEM contract.

33. The version of the “Revenue Sharing Agreement” produced to the ISC appeared to be an attachment to an email Respondent’s husband sent to Respondent on April 11, 2022, and forwarded to Mr. Cherfilus the next day – more than a year after the contract was awarded, while she was serving as a Member of Congress. The ISC received no records contemporaneous to the FDEM contract relating to the “Revenue Sharing Agreement.”
34. The version of the agreement produced to the ISC indicates that Respondent, Mr. Cherfilus, and Respondent’s sister each anticipated being allotted a share of the “revenue generated as a result of the COVID 19 vaccination project after the payment of employee wages and obligations” in exchange for “provid[ing] staffing and other services exclusively for the vaccination project” because “the staffing services required to perform the COVID 19 vaccination project exceed the services expected to be performed by Trinity Health Care Services employees in its ordinary business operations.” Specifically, SCM Consulting would receive 60 percent, EC Firm would receive 15 percent, and MC Nursing would receive 10 percent of the revenue. Mr. Cherfilus testified he “would assume [the remaining 15 percent] would’ve been left with Trinity for my parents.”
35. The ISC did not receive evidence that SCM Consulting, EC Firm, or MC Nursing actually provided staffing services to Trinity or had the capability to do so. No individuals were paid for vaccination services by these companies on behalf of Trinity. Mr. Cherfilus testified that EC Firm provided logistical support to Trinity, including “structur[ing] the billing process, the training with FDEM, the supervision, going out into the field, talking to the commanders on the base, what they needed, what needed to be done, and just relaying the information back between the different parts.” He testified that, although he was the primary person to deposit funds, decisions about the funds that Trinity received through the FDEM contract “would’ve been through the company, through Trinity . . . meaning, it would be through Sheila.”
36. More than half of the funds that were received by Trinity pursuant to the FDEM contract were disbursed to Respondent and her family members.
37. Trinity’s payroll records for the FDEM contract indicate that, in 2021, SCM Consulting was paid \$6,399,936.96; EC Firm received \$800,894.91; MC Nursing received \$74,000.00; and Respondent was paid \$111,720.00 directly. These internal records are inconsistent with Trinity’s bank records.
38. According to bank records, SCM Consulting received \$4,439,936.96; Respondent received \$2,297,360.00; EC Firm received \$600,000.00; and Mr. Cherfilus received \$219,494.91. Respondent deposited some Trinity checks addressed to her into the SCM Consulting bank account; similarly, Mr. Cherfilus deposited some Trinity checks made out to him into the EC Firm bank account. Ultimately, in 2021, funds from Trinity accounted for nearly 85 percent of the total income received by SCM Consulting and nearly 53 percent of the total income received by EC Firm. That year, EC Firm also received approximately 43 percent of its total income from SCM Consulting; the remaining incoming funds originated from Respondent’s

campaign bank account and cash deposits.

39. Respondent asserted in her FDs that she had entered into “profit sharing” and/or “consulting” agreements, either personally or through her company, SCM Consulting, pursuant to which she was paid these funds by Trinity. Neither Trinity nor Respondent produced records evidencing any such agreements or indicating Respondent was entitled to any FDEM funds received by Trinity.
40. A substantial amount of the FDEM funds distributed by Trinity to Respondent, SCM Consulting, and EC Firm went towards Respondent’s campaign. Respondent also used those funds on luxury personal items, including jewelry from Tiffany’s, a Tesla, designer clothing, high-end hotels, and a cruise.
41. On December 30, 2024, FDEM filed a civil lawsuit against Trinity seeking the return of \$5,778,316.45 in overpaid funds. This lawsuit was settled through mediation on April 9, 2025. Pursuant to the settlement, Trinity will repay \$5,624,659.43 to FDEM over the next 15 years. Mr. Cherfilus testified that none of the individual companies that received funds from the revenue sharing agreement, such as SCM Consulting, EC Firm, or MC Nursing, were required to pay back funds as a result of the settlement. He further told the ISC that there had not been “any discussion” about Respondent personally contributing funds to Trinity to enable it to make the repayment. He also denied knowing about the overpayment until FDEM contacted Trinity years later.
42. On November 19, 2025, an indictment was filed in the United States District Court for the Southern District of Florida (the Indictment) charging Respondent and Mr. Cherfilus with Conspiracy to Commit the Theft of Government Funds and Theft of Government Funds, related to their use of “the stolen and converted \$5,007,271.50” paid by FDEM for personal use and for Respondent’s congressional campaign. They were also charged with Conspiracy to Commit Money Laundering and eight counts of Money Laundering in connection with the funds. Respondent has publicly maintained her innocence and is scheduled to be arraigned on December 29, 2025.

III. 2021-2022 ELECTION CYCLE CAMPAIGNS – 2022 SPECIAL ELECTION AND 2022 GENERAL ELECTION

A. General Timeline

43. On December 31, 2020, Respondent filed a Statement of Candidacy for the 2022 general election for FL-20. In April 2021, Representative Hastings, who held the FL-20 House seat at that time, passed away. A special election was subsequently announced to fill his seat. On June 2, 2021, Respondent filed a Statement of Candidacy for the special election.
44. After a recount, Respondent was declared the winner of the Democratic primary for the special election on November 13, 2021, receiving a total of five votes more than her leading opponent in a crowded primary. Respondent won the special election on January 11, 2022, and was sworn into Congress on January 18, 2022.

45. On January 19, 2022, the day after she was sworn in for her first term, Respondent filed a Statement of Candidacy for the 2022 general election. Respondent won the FL-20 Democratic primary on August 23, 2022, by more than 35 percent of the vote and won reelection in the 2022 general election on November 8, 2022. Respondent began serving her second term in Congress on January 3, 2023.

B. Respondent's Loans to Her Campaigns

46. In 2021, Respondent and her campaign staff repeatedly touted her "self-funding" of her campaign. For example, Respondent's campaign manager publicly stated Respondent was "self-funded" and "decided to put her hard-earned money into the race." Other campaign staff testified that the campaign was run on "a self-bought, unbossed" platform.
47. During the 2021-2022 election cycle, which encompassed both the 2022 special election and the 2022 general election, Respondent's campaign reported to the FEC that it had received a total of \$6,236,493.50 in loans from Respondent over 105 separate transactions.
48. During this election cycle, Respondent's campaign utilized four different bank accounts at Financial Institution 1. The signature cards for all four bank accounts show Respondent and Mr. Cherfilus as authorized signatories; the campaign treasurer listed on the campaign's FEC filings was not a signatory on any of the accounts.
49. Campaign bank records indicate that Respondent's FEC reports for this cycle misreport several contributions or loans from Respondent, including reporting loans that did not exist, misstating the amount or date of loans, and failing to report contributions from Respondent.
50. In total, campaign bank records show that Respondent actually paid her campaign \$6,006,325.39 over the course of 99 separate transactions. The funds used to make those loans or contributions came directly from (1) a personal bank account for Respondent at Financial Institution 2; (2) SCM Consulting's bank account at Financial Institution 1; and (3) a joint bank account for Respondent and Mr. Cherfilus at Financial Institution 1 (Joint Account).
51. Nearly every substantial transaction paid to the campaign, or for the benefit of the campaign, from Respondent's bank accounts was preceded by a transaction from Trinity providing funds to that account. For example, Trinity wired \$2,000,000.00 to Respondent's personal account at Financial Institution 2 on June 23, 2021, and Respondent transferred \$2,000,000.00 to the campaign committee the next day.
52. Campaign bank records further show that some of the reported loans did not come from a personal bank account of Respondent or through her single-member LLC, SCM Consulting. Instead, \$392,368.38 came from a bank account in the name of EC Firm at Financial Institution 1, including \$10,000.00 after Respondent had separated from EC Firm; \$198,828.00 also came directly from Trinity's bank account at Financial Institution 1. Respondent was not an authorized user on EC Firm's bank account when she was a co-owner

of the company, and she did not have an ownership interest in Trintiy.

i. Loans Reported by the Campaign

53. Respondent's campaign committee reported to the FEC that Respondent lent \$6,236,493.50 to her campaigns over the course of 105 separate loans during the 2021-2022 election cycle. Specifically, the campaign reported that between June 2, 2021 (the date Respondent declared her candidacy for the special election campaign), and January 11, 2022 (the date she won the special election), Respondent lent her campaign \$4,684,558.50; two loans, totaling \$10,000.00, were also reported as being made in May 2021. The campaign further reported that Respondent lent her 2022 re-election campaign \$1,541,935.00.
54. Out of the 105 loans that Respondent's campaign reported, only 86 loans totaling \$4,548,605.84 matched dates and amounts in the bank records. However, the source accounts of these funds varied and included not only Respondent's personal bank accounts and her single-member LLC's account, but also the Joint Account, company accounts for EC Firm and Trinity, and cash deposits.
55. The majority of the remaining loans were reported inaccurately, either due to discrepancies with the date or amount of the loan, or in some cases, because they do not exist.
56. At least \$18,000.00 of the loans that Respondent's campaign has continuously reported do not appear to have been made at all.
57. Additionally, in several instances, a reported "loan" was a transfer from one campaign bank account to another, accounting for \$475,000.00 of the reported loans; the funds for those transfers appear to have originated from a single unreported contribution that Respondent made in September 2021.
58. Respondent, and those working under her supervision, understood that some of the loans from Respondent were never intended to be used by the campaign, but were instead a way to bolster the campaign's reported fundraising.
59. Respondent made transfers to her campaign at or near the end of FEC reporting periods, enabling the campaign to report higher cash-on-hand numbers, and in some instances, the campaign returned the loans to Respondent within approximately a week. For example, Respondent made a \$2,000,000.00 campaign loan on June 24, 2021 (one week before the end of the quarterly reporting period), and the campaign repaid \$1,980,000.00 on July 2, 2021; similarly, a loan reported as being made on March 31, 2022, for \$400,000.00 (the last day of the quarterly reporting period), which was received by the campaign on April 1, was repaid on April 4, 2022. As discussed further below, the \$400,000.00 repayment was also not initially reported on Schedule C (Loan Information) of the related FEC filing.
60. Before the \$2,000,000.00 loan was transmitted to the campaign on June 24, 2021, Respondent texted Hector Roos, a senior campaign advisor, regarding potential loans to her campaign. On June 11, 2021, Mr. Roos texted Respondent, "I think \$100k by end of month is a

reasonable goal. . . . As for how much to loan, I think as much as you're comfortable with." Respondent stated, "Goal is 2 million at least 1.5." Later, she replied, "I am not planning on using that amount just leveraging. . . . I think that is a good idea." Mr. Roos responded, "Indeed. But nobody has to know that." Respondent simply replied, "Yes."

61. On April 1, 2022, campaign staff exchanged messages about the finances of one of Respondent's primary challengers in the 2022 re-election campaign. Respondent's senior campaign staffer and current District Chief of Staff, Nadege LeBlanc, stated, "[s]o April 15 everyone will see he has more money than us." Respondent's senior campaign advisor, Individual 1, responded, "[n]o we are reporting more than a million dollars (long story not getting into it by text)." When asked what the "long story" was, Individual 1 testified "[Respondent] put a million dollars into the account right before the deadline and then took the money back out, I think, the next day." He testified that he was aware of the plan to put money in and then take it back out because "[Respondent] told me she was going to do it."
62. The original April 2022 quarterly report filed by Respondent's campaign with the FEC showed \$1,675,609.43 cash on hand at the end of the reporting period, including the \$400,000.00 loan from Respondent reported on March 31, 2022, described above. On September 16, 2022, roughly three weeks after the primary election, Respondent's campaign amended multiple reports, including the April 2022 quarterly report, in part to "[d]elete[] 4 incorrect duplicate loans of \$341,000 [totaling \$1,364,000.00]" that were regularly reflected on the campaign's reports since prior to the 2021 special election. The "duplicate loans" were identified after the campaign received a Reason to Believe letter from the FEC. With the \$1,364,000.00 in incorrectly reported loans deleted and other miscellaneous amendments, the ending cash on hand in its April 2022 quarterly report was then stated to be \$377,609.43. The campaign amended the reported cash on hand in its April 2022 quarterly report again on November 7, 2022, the day before the general election, to \$396,402.99.
63. Campaign bank records show that the campaign in fact had only \$27,300.93 as of the end of the reporting period covered by the April 2022 quarterly report. The primary challenger's original April 2022 quarterly report filed with the FEC showed \$208,236.09 cash on hand at the end of the reporting period.

ii. Contributions Not Reported by the Campaign

64. Respondent's campaign bank account records show that during the 2021-2022 election cycle, Respondent's campaign received eight payments totaling \$1,001,828.00 from bank accounts controlled by Respondent or her family members that were not reported to the FEC.
65. Between June 1, 2021 (the date Respondent declared her candidacy for the special election campaign) and January 11, 2022 (the date she won the special election), Respondent's campaign received \$88,828.00 in unreported payments from Trinity and \$870,000.00 from the Joint Account. Respondent's 2022 re-election campaign received \$10,000.00 in unreported payments from EC Firm and \$33,000.00 from the Joint Account.
66. Respondent also paid for over \$100,000.00 in campaign costs directly from her personal and

SCM Consulting's bank accounts, including digital ads, consulting expenses, rent, and various vendor payments, without reporting those payments as loans or in-kind expenditures. For example, SCM Consulting paid \$15,000.00 for the campaign's rent, over \$94,000.00 on social media, and over \$28,000.00 to a political consulting firm.

67. Respondent, through her personal accounts and her SCM Consulting account, made hundreds of thousands of dollars in payments to outside organizations that were then used for the benefit of her campaign, including Leadership in Action PAC (LIA) and Truth & Justice, Inc. (T&J).

C. Campaign's Repayment of Respondent's Loans

68. Respondent's campaign committee reported to the FEC that during the 2021-2022 election cycle, Respondent's campaign made a total of \$2,489,568.50 in loan repayments to Respondent over the course of 11 repayments. Campaign bank records show Respondent actually received at least \$2,807,222.51 from the campaign over 20 payments. Two checks made out to cash, totaling \$39,568.50, were also reported as loan repayments to Respondent.
69. Campaign bank records show that the reported loan repayments, as well as the unreported transfers from the campaign to Respondent, were directed to five bank accounts: (1) Respondent's personal account at Financial Institution 1; (2) Respondent's personal account at Financial Institution 2; (3) SCM Consulting's account at Financial Institution 1; (4) EC Firm's account at Financial Institution 1; and (5) the Joint Account at Financial Institution 1.

i. Repayments Reported by the Campaign

70. Respondent's campaign committee reported making a total of \$2,489,568.50 in loan repayments to Respondent over the course of 11 repayments in the 2021-2022 election cycle. Specifically, the campaign reported to the FEC that between June 1, 2021 (the date Respondent declared her candidacy for the special election campaign), and January 11, 2022 (the date she won the special election), Respondent's campaign repaid her \$2,019,568.50 over three payments. The campaign further reported that Respondent's campaign repaid her \$470,000.00 during the 2022 re-election campaign over eight payments.
71. Out of the 11 loan repayments that Respondent's campaign reported, eight payments totaling \$2,449,000.00 matched dates and amounts in the bank records. However, the recipient accounts for these funds varied.
72. Two additional reported loan repayments correspond to checks made out to cash, one on July 2, 2021 for \$20,000.00, and another on September 23, 2021, for \$19,568.50.

ii. Payments to Respondent Not Reported by the Campaign

73. Bank records for the campaign's accounts reveal that during the 2021-2022 election cycle, Respondent's campaign made at least 10 additional payments to Respondent, totaling \$322,928.00.

74. Additionally, a reported loan repayment of \$1,000.00 on October 21, 2022, was in fact a \$10,000.00 payment.

iii. Recipient Accounts for Campaign Payments to Respondent (Reported and Unreported)

75. Respondent’s campaign made 20 payments totaling \$2,807,222.51 to four bank accounts associated with Respondent: (1) Respondent’s personal account at Financial Institution 2; (2) SCM Consulting’s bank account at Financial Institution 1; (3) EC Firm’s bank account at Financial Institution 1; and (4) the Joint Account at Financial Institution 1.

Owner of Bank Account	Amount Received from Campaign Bank Account
Respondent	\$2,087,100.00
Joint Account	\$586,000.00
EC Firm	\$35,294.51
SCM Consulting	\$98,828.00

76. Respondent’s campaign reported a payment to EC Firm on June 3, 2021, for \$25,294.51 as a disbursement for “signs.” The funds were transferred from the campaign to EC Firm, which then wrote a \$10,000.00 check to cash the same day. Respondent and Mr. Cherfilus did not produce records showing that EC Firm made signs on behalf of the campaign. Mr. Cherfilus informed the Office of Congressional Conduct (OCC), formerly the Office of Congressional Ethics, that this amount was “initially withdrawn from [Respondent’s] corporate equity account for the campaign. However, the Candidate opted to return the funds back to her equity account with [EC Firm].” No contribution or loan originating from Respondent was reported to the FEC in this amount prior to the disbursement. In testimony, Mr. Cherfilus stated that he “did not know” if the notation for “signs” was accurate but stated that he had “done signs for [Respondent’s campaign] through EC Firm.” This amount is included in the total payments to EC Firm above.
77. The bank records for Respondent’s campaign show \$39,568.50 in cash withdrawals that were reported to the FEC as loan repayments.
78. Bank records show an additional \$3,126.48 in cash withdrawals, some of which were reported to the FEC as wage payments to family members, and others which were not reported at all.
79. During the 2021-2022 election cycle, Respondent also withdrew hundreds of thousands of dollars in cash from her personal and business accounts. The ISC was unable to determine how much of these cash withdrawals were ultimately used for the benefit of the campaign or for personal expenses.

D. Improper Individual Campaign Contributions

80. During the 2021-2022 election cycle, the maximum donation an individual donor (other than Respondent) could make to Respondent’s campaign was \$2,900.00 per election. The limits

apply to all types of contributions, including in-kind contributions. The FEC's website further elaborates on in-kind contributions:

Goods or services offered free or at less than the usual charge result in an in-kind contribution. Similarly, when a person pays for goods or services on the committee's behalf, the payment is an in-kind contribution. An expenditure made by any person in cooperation, consultation or concert with, or at the request or suggestion of, a candidate's campaign is also considered an in-kind contribution to the candidate.

i. Edwin Cherfilus

81. On June 3, 2021, Respondent's campaign reported receiving a \$5,800.00 contribution from Mr. Cherfilus for the primary and general elections. This contribution was corroborated by the campaign's bank records.
82. During the 2021-2022 election cycle, Mr. Cherfilus acted as the campaign's finance director. He "oversaw all the money" for the campaign and was closely involved in the campaign's day-to-day operations.
83. On several occasions, Mr. Cherfilus made payments to outside organizations that used those funds to make payments on behalf of Respondent's campaign. For example:
 - a. On November 2, 2021, and December 21, 2021, Mr. Cherfilus made two payments totaling \$91,865.00 from his personal checking account at Financial Institution 3 to National Haitian American Elected Officials Network Progressive Political Action Committee (NHAEON PAC). Although Mr. Cherfilus denied knowing that NHAEON PAC used the funds he supplied for Respondent's campaign, records show that NHAEON PAC's chairman communicated with Mr. Cherfilus directly about spending on media buys and events in support of Respondent's campaign, as described below.
 - b. Mr. Cherfilus indirectly contributed to LIA, a state PAC controlled by Respondent's senior campaign advisor, Individual 1. On January 19, 2022, Mr. Cherfilus sent \$2,500.00 from his personal checking account at Financial Institution 3 to the chairperson of LIA. The same day, the chairperson of LIA contributed \$2,500.00 to LIA; LIA reported the contribution as from the chairperson. As described below, LIA frequently made payments to vendors on behalf of Respondent's campaign.
 - c. On July 21, 2022, Mr. Cherfilus paid \$40,000.00 from his personal checking account at Financial Institution 3 to Haitian American Votes PAC (HAV PAC), as described below.
84. Mr. Cherfilus also caused the transfer of large sums to the campaign through EC Firm, both during and after the time that Respondent claimed to have a partnership interest in the firm.

85. EC Firm received \$600,000.00 from Trinity in 2021; Mr. Cherfilus also deposited \$219,494.91 in checks made out to himself in EC Firm's bank account. EC Firm gave \$382,368.38 to Respondent's campaign in 2021, which Respondent either did not report, or reported as personal campaign loans. Without the money from Trinity, EC Firm would not have had sufficient funds to make those payments to the campaign.
86. On May 11, 2022, EC Firm transferred \$10,000.00 to the campaign, more than five months after Respondent executed the Separation Agreement. This payment was not reported to the FEC.
87. Mr. Cherfilus also paid campaign staff and vendors for campaign services using his personal funds and EC Firm funds. Those payments were not reported to the FEC as in-kind contributions and the value of the payments far exceeded the contribution limit for individuals.
88. For example, on June 7, 2022, Mr. Cherfilus paid \$1,550.00 from his personal checking account at Financial Institution 3 to a design vendor frequently contracted by the campaign. This amount matched a June 3, 2022, invoice from the vendor to the campaign for items including "Door Hanger Design" and "Campaign Logo Re-design." The vendor sent the receipt for the payment to Mr. Cherfilus' campaign email address. The campaign did not report this payment to the FEC.
89. One individual was paid \$42,700.00 as an employee of EC Firm. However, that individual's work at EC Firm involved work for the campaign, including debate preparation and drafting responses to letters written to Respondent. The ISC was unable to determine how much of these payments from EC Firm were attributable to work performed on behalf of Respondent's campaign versus any services EC Firm may have provided other "clients." The employee testified that his work at EC Firm involved "research" on "projects [Mr. Cherfilus] had [him] looking into."

ii. Respondent's Sister and Nadege LeBlanc

90. Respondent's sister received \$65,157.37 from Trinity in 2021; her company, MC Nursing, received \$74,000.00.
91. Ms. LeBlanc received \$357,797.78 directly from Trinity in 2021, including an August 2021 payment for \$334,757.78 for "project payment." She also received \$32,640.00 from Trinity in 2021 through her company, Finance & Fitness Consulting, LLC.
92. Ms. LeBlanc did not answer questions from the ISC about her payments from Trinity or her contributions to the campaign, asserting her Fifth Amendment right against self-incrimination.
93. Respondent's sister produced documents in response to a Request for Information. The ISC requested she participate in a voluntary interview, but she declined. Respondent's sister failed

to respond to the ISC's inquiry as to whether she would assert her Fifth Amendment right against self-incrimination if served with a subpoena.

94. FECA strictly prohibits contributions made by one person in the name of another. If a campaign committee discovers that contributions it received were made in the name of another, it must refund the money to the original source of funds if the identity of that source is known or otherwise disgorge the funds.
95. Respondent stated in a June 28, 2021, text message to her campaign treasurer, "[t]he max is 2 checks of 2900. That is why [Respondent's sister] had to give money to Nadege for her to make another donation."
96. Bank records show that Respondent's sister's personal bank account at Financial Institution 4 received \$50,000.00 from Trinity on June 25, 2021. The same day, she withdrew \$30,000.00 in cash and a few days later, on June 28, 2021, she withdrew another \$6,000.00 in cash.
97. Also on June 28, 2021, Ms. LeBlanc deposited \$3,900.00 in cash to her personal bank account at Banking Institution 4; the next day, June 29, 2021, Ms. LeBlanc made a \$2,900 cash deposit. On June 30, 2021, Ms. LeBlanc made out two checks for \$2,900.00 to Respondent's campaign.
98. On June 30, 2021, Respondent's campaign deposited a \$2,800.00 check from Respondent's sister and two checks from Ms. LeBlanc totaling \$5,800.00.
99. Respondent's campaign committee improperly reported receiving two contributions from Respondent's sister on June 30, 2021, totaling \$5,300.00 and a \$2,500.00 contribution on July 15, 2021 (which, if accurate, would exceed contribution limits), as well as two contributions from Ms. LeBlanc on June 25, 2021, totaling \$5,800.00.
100. On September 1, 2021, Ms. LeBlanc's company, Finance & Fitness Consulting, LLC received \$10,000.00 from SCM Consulting. This is the only payment Finance & Fitness Consulting, LLC received from SCM Consulting. The ISC received no evidence that Finance & Fitness Consulting, LLC performed any services for SCM Consulting or was otherwise owed these funds.
101. Two days later, on September 3, 2021, Fitness & Finance Consulting, LLC contributed \$10,000.00 to NHAEON PAC. The funds were used by NHAEON PAC to pay expenses on behalf of Respondent's campaign, including payments to radio stations.
102. The Indictment charged Respondent and Ms. LeBlanc with conspiring to and making and receiving straw donor contributions. Respondent has generally denied the charges in public; the ISC is not aware of any statements by Ms. LeBlanc regarding the charges, but she has entered a not guilty plea.
103. On January 10, 2022, Respondent's sister, through her single-member LLC, MC Nursing,

contributed \$20,000.00 to NHAEON PAC from MC Nursing's account at Financial Institution 1. On January 12, 2022, MC Nursing contributed \$60,000.00 to the National Haitian American Elected Officials Network (NHAEON), a non-profit organization, with the wire memo "4DC Reception." The funds were used to pay for expenses related to the campaign and for a pre-swearing-in event hosted by NHAEON in coordination with Respondent on January 13, 2022, described below.

E. Improper Corporate Campaign Contributions

i. Trinity

104. Trinity contributed \$198,828.00 directly to Respondent's campaign.

105. Trinity also indirectly funded Respondent's campaign through large disbursements to Respondent personally, as well as to SCM Consulting, EC Firm, and the Joint Account, which were later loaned or given to the campaign. This funding was almost entirely from Trinity's FDEM funds, including the overpayments to which Trinity did not have a valid legal claim.

106. In total, at least \$3,600,000.00 of the funds paid to Trinity pursuant to the FDEM contract made its way into Respondent's campaign for at least some period of time.

107. The ISC provided Trinity and Respondent with numerous chances to explain whether those were funds Respondent had a legal right to, but neither party provided any such explanation. The ISC uncovered no agreement between Trinity and Respondent, or any entity associated with Respondent, or any other evidence demonstrating that Respondent was in fact entitled to these funds.

ii. Leadership in Action PAC

108. LIA was a state PAC established by Individual 1 in 2019. Although LIA had a named treasurer and chairperson, Individual 1 was the executive director of the organization and controlled LIA.

109. Individual 1 was a senior advisor on Respondent's campaign. Multiple campaign staffers referred to him as the campaign manager and reported to him. The actual campaign manager for the 2021 special election testified that Individual 1 was much more involved in the decision making for the campaign than he was. Individual 1 and the campaign closely coordinated communications and spending with LIA.

110. In 2021, LIA received just under \$303,000.00 in contributions, nearly all of which was funded by SCM Consulting. Between May 3, 2021, and November 12, 2021, LIA reported to the state of Florida that it had received \$269,424.69 from SCM Consulting.

111. LIA in fact received \$231,995.61 from SCM Consulting. This amount includes a check for \$9,552.56 on June 7, 2021, that was not reported to the Florida Division of Elections.

112. In two checks from SCM Consulting to LIA dated March 14, 2021, and May 21, 2021, totaling \$6,377.36, the memo lines stated, "office items" and "office supplies," respectively; in another check for \$4,400.00 dated July 1, 2021, the memo line stated, "consulting."
113. Of the funds reportedly from SCM Consulting, \$25,726.64 actually came from EC Firm: \$7,056.64 on June 18, 2021, and \$18,670.00 on July 20, 2021.
114. LIA also reported receiving \$12,425.00 from SCM Consulting on July 28, 2021. LIA did receive \$12,425.00 on July 28, 2021, but the money came from Respondent's principal campaign committee. These funds were refunded to the campaign on August 12, 2021, after LIA received \$12,425.00 from SCM Consulting on August 10, 2021.
115. From May to November 2021, SCM Consulting sent over 20 separate payments to Individual 1 for irregular amounts ranging from \$2,616.04 to \$15,621.00.
116. According to bank records, from 2021 through 2022, LIA paid more than a dozen vendors and individuals who worked for Respondent's campaign, often shortly after receiving funds from SCM Consulting.
117. Many of those payments appear to have been explicitly for the benefit of Respondent's campaign, including payments for the campaign's rent from November 2022 through March 2023, as well as checks to campaign vendors with memo lines citing invoices billed to Respondent's campaign.
118. For example, on July 26, 2022, Individual 2, a supporter of Respondent's campaign and then-chairman of NHAEON PAC and HAV PAC, placed a \$5,000.00 ad buy with a vendor, stating in his correspondence, "[T]his is directly from her campaign!" The vendor sent a \$5,000.00 invoice to Individual 2 for "Campaign to re-elect Sheila C. McCor. c/o [Individual 2]" the next day. On October 24, 2022, LIA paid this invoice and noted in the check memo, "Inv SCM01," which corresponds to the invoice number from the vendor.
119. After nearly every check from SCM Consulting was deposited, Individual 1 withdrew at least \$1,000.00 in cash from an ATM within a few days.
120. Separate from frequent cash withdrawals, Individual 1 also directly received over \$140,000.00 from LIA in 2021, which amounted to over one third of his total earnings from LIA from 2019 through 2023. He was never paid directly by Respondent's campaign. Individual 1 testified, "I literally did obviously get compensated but not from [Respondent]. I never made money from the government. I never got paid by the campaign."
121. Individual 1 denied that payments from SCM Consulting to LIA were for his work on Respondent's campaign and described them as "donations." When asked about some of the specific checks from SCM Consulting, including checks for odd amounts with references such as "office items" in the memo, Individual 1 maintained that those were merely donations unrelated to Respondent's campaign.

122. In text messages between Respondent and Mr. Roos exchanged on May 3, 2021, Mr. Roos explicitly described \$11,500.00 paid from SCM Consulting to LIA as for “[Individual 1] reimbursement” and “[Individual 1] May payment.”
123. Individual 1 testified that some of the specific payments that LIA made to vendors and individuals who worked for Respondent’s campaign were related to other South Florida campaigns. According to Individual 1, he had an agreement with Respondent that he “would do work in the community that would help her campaign,” rather than work specifically for the campaign. He could not explain why some checks to vendors included references to Respondent or her campaign in the memo lines. Ultimately, when asked whether he ever used funds from LIA or T&J to pay a campaign vendor for work done for Respondent, he responded, “I honestly don’t know. But I’m going to also at that same time invoke my Fifth Amendment privilege against self-incrimination and respectfully decline to answer your question.”
124. In its first Referral to the Committee, a copy of which was provided to Respondent on September 25, 2024, OCC found that “Leadership in Action PAC provided goods and services in connection with Rep. Cherfilus-McCormick’s political campaigns” and that Respondent’s “payments to Leadership in Action PAC were likely contributions to her campaign.” Respondent was invited to provide a response to OCC’s Referral; her then-counsel submitted the following response on her behalf:

Representative Cherfilus-McCormick does not dispute that Leadership in Action may have made expenditures supportive of her campaign with the funds she provided it. She made disbursements to Leadership in Action, understanding that she was providing it with funds that would be used to advance her campaign and others on the ticket. She did so with funds eligible for use in her campaign, and she understood that the payments would be handled and reported correctly. It should be noted that FEC regulation in this area is underdeveloped and when work with allied groups becomes a contribution is not well marked.

Both contributions to and expenditures by Leadership in Action were publicly disclosed, as is required by Florida election law. If upon review any campaign expenditures made by Leadership in Action were sufficiently coordinated that they should have been reported as contributions to or expenditures of Sheila Cherfilus McCormick for Congress, the campaign is prepared to make the necessary corrections.

iii. NHAEON

125. NHAEON describes itself as “a 501c3 non-partisan organization that engages in the education, empowerment, and political process, amplifying the voice of the Haitian-American community.” Individual 2 was formerly the chairman of NHAEON.
126. Respondent’s campaign coordinated with NHAEON to organize the Pre-Swearing-In Event

held for Respondent on January 13, 2022, at the International Spy Museum in Washington, D.C. Campaign staff and Individual 2 corresponded regarding the details of the event, including the budget. NHAEON also paid \$1,877.69 for a video to be made commemorating the event, portions of which Respondent uses on her campaign website.

127. Individual 2 testified that Respondent requested his assistance in organizing this event to “make it bigger.” He further stated that Respondent was “specific” and “detailed” in what she wanted for the event. Invitees included “[Respondent’s family], elected officials from NHAEON, and . . . professionals within her circle.” The cost for the event exceeded \$60,000.00, which Individual 2 testified was primarily funded by Respondent, through payments to NHAEON, which in turn paid vendors. In contrast, Mr. Cherfilus testified that NHAEON organized the event, “pretty much ran it themselves,” and that NHAEON paid for the event, although he could not recall why NHAEON sought reimbursement for related expenses.

1. *NHAEON Progressive Political Action Committee*

128. NHAEON PAC was registered as a state political committee in Florida by Individual 2 on October 2, 2020. NHAEON PAC was not registered as a federal political committee with the FEC.

129. In late 2021 and early 2022, NHAEON PAC coordinated with Respondent and individuals associated with her campaign on media buys.

130. On November 1, 2021, Individual 2 emailed Mr. Cherfilus, copying Respondent, attaching information about media buys, and including a breakdown of \$16,865.00 in expenses for radio appearances and related expenses. The next day, Mr. Cherfilus wired \$41,865.00 from his personal checking account at Financial Institution 3 to NHAEON PAC’s account.

131. NHAEON PAC then made the media expenditures as detailed in the document sent to Respondent and Mr. Cherfilus. For example, one listed expense was a \$750.00 payment to a radio personality for “Various Stations Speaking on behalf of NHAEON for Sheila.” NHAEON PAC made the disbursement to that individual in that amount on November 9, 2021, and reported the expenditure as “advertising” in its state campaign finance disclosures.

132. In the following weeks, NHAEON PAC continued to make additional expenditures for the benefit of Respondent’s campaign. Some of those expenditures were made by check; six checks to vendors, totaling \$4,000.00, contained the memo, “12/16/21-Promotion of Sheila S. [sic] McCormick.”

133. On December 14, 2021, Individual 2 emailed Respondent and her brother wiring information for NHAEON and NHAEON PAC. The same day, Respondent’s campaign transferred \$28,000.00 to the Joint Account, which then wired \$28,000.00 to NHAEON PAC. These funds were used to pay expenses related to the Pre-Swearing-In Event. Respondent’s campaign did not report this disbursement to the FEC.

134. On December 20, 2021, Individual 2 emailed Mr. Cherfilus, copying Respondent, noting that he thought he had sent the “Radio Recommended Budget” the prior week, and attaching a spreadsheet listing \$50,000.00 in “Haitian Radio/Outreach” costs under the heading “January 11, 2022 General Election Expenses.” On December 21, 2021, Mr. Cherfilus wired \$50,000.00 to NHAEON PAC from his personal checking account at Financial Institution 3.
135. NHAEON and NHAEON PAC continued to invoice Mr. Cherfilus for costs related to Respondent’s campaign in 2022. For example, on January 10, 2022, Individual 2 emailed Mr. Cherfilus an invoice from NHAEON totaling \$60,027.00, representing individual invoices from multiple vendors addressed to NHAEON for expenses related to the Pre-Swearing-In Event. On February 8, 2022, NHAEON PAC sent a separate invoice to Mr. Cherfilus, also dated January 10, 2022, totaling \$19,966.80 for three items: \$18,441.80 “reimbursement” for a 37,000-piece mailer, \$525.00 for graphic design for “SCM MAILER,” and an additional \$1,000.00 for services from a Haitian-American media company. Records indicate that the \$18,441.80 mailing charge was for a payment made to a campaign vendor for mailers that were coordinated by the campaign’s senior advisor, Individual 1, and Individual 2 for the benefit of Respondent’s campaign.
136. On January 12, 2022, Respondent’s sister wired \$60,000.00 to NHAEON from MC Nursing with the memo line “4DC Reception.” On January 20, 2022, NHAEON sent Mr. Cherfilus a receipt dated January 12, 2022, for \$60,027.00. When sending the outstanding \$19,966.80 invoice to Mr. Cherfilus on February 8, 2022, Individual 2 stated, “[T]his is the balance for the PAC remember [Respondent’s sister] had only deposited the \$60k into the NHAEON account. Thanks!”

2. *Haitian American Votes PAC*

137. HAV PAC was registered as a “hybrid” federal political action committee with the FEC in June 2022. Individual 2 served as HAV PAC’s chairman.
138. Mr. Cherfilus coordinated campaign advertising with Individual 2. Individual 2 emailed Mr. Cherfilus spreadsheets with media placements and the costs, which were then reimbursed by Mr. Cherfilus.
139. On July 21, 2022, Mr. Cherfilus wired \$40,000.00 to HAV PAC from his personal checking account at Financial Institution 3. Mr. Cherfilus informed OCC that this was “a personal contribution to an organization that advocates for Mr. Cherfilus’ interests as a Haitian American.” HAV PAC reported the \$40,000.00 as a contribution to the FEC. Documentary evidence suggests that this payment was for Respondent’s campaign. On July 22, 2022, Individual 2 sent Mr. Cherfilus a spreadsheet titled “Revised HA[V] PAC for Sheila McCormick Buy 22.xlsx,” listing media placements in FL-20 between July 4 and July 22, 2022, totaling \$40,000.00. Between July 22 and July 28, 2022, HAV PAC wrote at least 23 checks totaling more than \$20,000.00, which directly corresponded to the spreadsheet in both recipient and amount. Although the memo line is blank on most of these checks, the memo on one of them provides “Campaign for Sheila – 2022.” Individual 2 testified that the purpose of Mr. Cherfilus’ contribution was for Respondent’s campaign advertising.

140. HAV PAC reported making a total of \$65,290.00 in disbursements from July 22, 2022, through September 27, 2022, to the FEC; each of those 42 disbursements were listed as “independent expenditures” representing “support” for candidate “McCormick, Sheila Cherfilus.” The descriptions for all but four of the disbursements were for radio and advertising.
141. HAV PAC held a post-swearing-in event “in honor of” Respondent on January 4, 2023, at Union Station in Washington, D.C. The event flyer did not indicate that HAV PAC was hosting, but Individual 2 informed guests the event was hosted by HAV PAC.
142. On December 13, 2022, a Florida-based corporation, Petrogaz-Haiti, S.A., LLC (Petrogaz-Haiti) wired \$40,000.00 to HAV PAC’s checking account. Individual 2 testified that this contribution was for HAV PAC’s swearing-in event in Respondent’s honor in January 2023 and that the wife of Petrogaz-Haiti’s owner stayed in the “host hotel” during the event. He also testified that the owner of Petrogaz-Haiti’s wife “talked about [] support[ing] [Respondent’s campaign] financially.”
143. Between December 15, 2022, and December 21, 2022, HAV PAC made three payments by wire to vendors for the swearing in event, totaling \$39,234.10. From December 13, 2022, through December 28, 2022, Petrogaz-Haiti was the lone depositor to HAV PAC’s checking account, and HAV PAC could not have paid the vendors without these funds.

iv. Human Scale Strategies LLC and American Integrity Foundation, Inc.

144. Human Scale Strategies LLC (HSS) was registered by Mr. Roos, a senior campaign advisor, on September 16, 2019.
145. Mr. Roos provided services to the campaign, including “work[ing] closely with the Federal Elections [sic] Commission on campaign finance filings, responsiveness [sic], audits that were complicated by the complicated bookkeeping methods” and “provid[ing] bookkeeping and compliance services towards fundraising goals to the campaign both with and through the Leadership PAC.”
146. Mr. Roos failed to comply with multiple subpoenas from the ISC.
147. HSS held an account at Financial Institution 6. Mr. Roos was the only individual authorized to access that account.
148. From May 2021 through August 2022, HSS’s bank account at Financial Institution 6 received over \$30,000.00 from Respondent’s campaign, EC Firm, and other individuals and entities associated with Respondent.
149. Mr. Roos paid campaign vendors from the HSS bank account, on behalf of the campaign, on at least one occasion. For example, on September 22, 2021, HSS wrote a check for \$5,000.00 to a vendor with the memo line, “Sheila Cherfilus-McCormick.” The vendor testified that the

check was for work performed for Respondent's campaign.

150. From February 2021 through December 2022, an additional \$90,900.00 was transferred to HSS's bank account from another company associated with Mr. Roos, American Integrity Foundation, Inc. (AIF).
151. From May through November 2021, AIF's bank account at Financial Institution 6 received nearly \$40,000.00 from SCM Consulting. These payments appear to be payments to Mr. Roos for campaign services.
152. In a text chain with Respondent, Mr. Roos indicated that the funds from SCM Consulting to AIF were for his work on her campaign. For example, on May 3, 2021, Mr. Roos instructed Respondent to wire AIF \$6,750.00, reflecting "Hector April payment" and "Hector May payment." He further instructed Respondent, "This is not to be paid from the campaign account." Respondent made the requested payment from SCM Consulting to AIF the same day. Some subsequent checks from SCM Consulting to AIF indicated additional monthly payments, including an October 1, 2021, check for \$5,000.00 with the memo "Sept" and an October 22, 2021, check for \$5,000.00 with the memo "November payment."

v. Truth & Justice Inc., Progressive People, Inc., and Petrogaz-Haiti, S.A., LLC

153. T&J was incorporated on August 27, 2021. According to its articles of incorporation, its purpose was "exclusively for the promotion of social welfare" and it was specifically empowered to "engage in activities which will enhance the employment of and protect workers engaged in the cruise industry and businesses related to such industry."
154. T&J's director testified that T&J was "[b]asically . . . a fund created to facilitate [Respondent's] campaign." He further described it as "more like a trust account" that "was just created to have a checks and balance of the campaign funds." He further testified that he never described T&J as a PAC and to his knowledge, T&J was not affiliated with a state PAC.
155. Individual 1 testified he did work for T&J, and it was set up because "[T&J's director and I] were looking for bigger checks from different people. And I didn't want to commingle what we were doing, so we set up another entity so that we could accept funds."
156. T&J opened a bank account at Financial Institution 7 in or around October 2021. T&J's director testified that he, Individual 1, and Respondent's campaign manager could make financial decisions regarding T&J's funds and that the debit card for T&J's bank account would occasionally be left in Respondent's campaign office so "it was accessible . . . in case an emergency came up."
157. T&J never registered with either the FEC or the state of Florida as any type of political committee, and no disclosures regarding T&J's spending or fundraising were ever made to either entity.

158. T&J is currently inactive and was administratively dissolved by the state of Florida on September 23, 2022, for failure to file an annual report. When asked about the unfiled report, T&J's director stated that "normally the campaign when they tie up everything, they normally take care of that." However, T&J's bank accounts reflect activity after the administrative dissolution date.
159. T&J received \$982,379.00 between its founding in August 2021 and November 10, 2022, two days after the 2022 general election. A total of \$143,899.00 of T&J's funds came from SCM Consulting, EC Firm, and the Joint Account.
- a. Between its founding in August 2021 and the special election on January 11, 2022, T&J received just under \$37,000.00 from SCM Consulting; this amount was almost 90% of all funding T&J received during that period. T&J's director testified that he did not know what SCM Consulting was but that he assumed the payments were "for the campaign."
 - b. Between the beginning of Respondent's 2022 general election campaign on January 19, 2022, and the end of June 2022, T&J received an additional \$26,000.00 from SCM Consulting, as well as \$16,000.00 from EC Firm and \$16,000.00 from the Joint Account. T&J's director claimed not to know what EC Firm was, but when asked what a payment from EC Firm was for, he responded "it's not a payment. I would think that this is money to run the campaign."
160. In July 2022, T&J began receiving funds from Progressive People, Inc. (PPI).
161. PPI was incorporated in the state of Florida on February 15, 2022, by Michael Joseph. From its incorporation date until at least April 28, 2025, Mr. Joseph was the President, and Respondent's husband was the Vice President; both were also directors of the company.
162. PPI opened an account at Financial Institution 6 on March 7, 2022. Mr. Joseph and Respondent's husband were the only people with access to the account.
163. Respondent's husband told the ISC that he could not recall who had the idea to start PPI, or how he got involved. He said he was not sure if he discussed PPI with Respondent and that "PPI was completely separate from what she was doing."
164. Mr. Joseph refused to comply with multiple subpoenas from the ISC for documents and testimony.
165. PPI was not registered with either the FEC or the state of Florida as any type of political committee. No disclosures regarding PPI's spending or fundraising were ever made to either entity.
166. PPI's stated purpose in its Articles of Incorporation was "to work with historically marginalized communities" and it purportedly was "organized exclusively for Civic Leagues, Social Welfare Organizations, and Local Associations of Employees, including, for such

purposes, the making of distributions to organizations that qualify as exempt organizations under section 501(c)(4) of the Internal Revenue Code.” Additionally, the Articles of Incorporation stated “[n]o substantial part of the activities of the organization shall intervene in any political campaign on behalf of any candidate for public office.”

167. When asked about PPI’s activities, Respondent’s husband testified, “I think we tried to find organizations that were -- it was a social welfare organization, so we wanted to find, I think, good causes to support. But beyond that -- beyond that, I really couldn’t tell you, but we tried to find good causes to support.” When asked what type of causes, he replied, “Let’s see. So my recollection is that we supported other nonprofit organizations.” When asked for specific names, the only one he could recall was a Maryland organization for which he serves on the Board, which received a total of \$10,000.00 from PPI over two transactions in 2023.
168. PPI raised a majority of its funds in 2022 from corporations. These funds were largely transferred to T&J.
169. Respondent’s husband testified that “there was a process” for how PPI determined to disburse its funds, but he could not recall what that process was.
170. From July 2022 through the general election on November 8, 2022, PPI gave T&J \$666,000.00 over nine payments, which accounted for approximately 90% of its funding during this period. PPI also sent T&J \$59,000.00 on November 10, 2022, two days after Respondent won the 2022 general election, bringing the total amount given to T&J to \$725,000.00.
171. At least \$498,000.00 of the funds from PPI were specifically solicited by T&J via letters from T&J’s director to Mr. Joseph, including the final \$59,000.00 payment (which was requested on November 7, 2022, prior to the election). T&J’s director testified that he did not write the letters and only signed them. At least four of the solicitation letters were sent to Mr. Joseph via Individual 1.
172. In his testimony to the ISC, Individual 1 indicated that the solicitation letters were Respondent’s husband’s idea. Respondent’s husband said he could not recall whether he had seen the letters before.
173. T&J’s solicitation letters to PPI stated that T&J was “registered in the state of Florida as a 501(c)(4) which enables [it] to receive donations” and claimed that the requested funds were to “help with [T&J’s] voter education programs” and/or a “voter awareness project reaching the underserved in South Florida.”
174. Respondent’s husband said he had “no idea how much voter outreach costs,” what specific activities T&J undertook with the \$725,000.00 that PPI funneled to the organization, or why so much of PPI’s funds went to only one organization. When asked whether any voter outreach actually happened, he responded, “my recollection is that we did not have a requirement that these organizations demonstrate results.”

175. Respondent's husband testified that he did not know where PPI's funding came from, although he was aware that it had hundreds of thousands of dollars in its bank account.
176. The primary source of PPI's funds during the 2022 general election was Petrogaz-Haiti. Petrogaz-Haiti was registered in Florida in 2010. Petrogaz-Haiti received at least \$12,500,000.00 from the Ministry of Economy and Finance of Haiti between July and December 2021. It had no other major source of income in that time period or in 2022.
177. During 2022, out of PPI's approximately \$914,000.00 of incoming funds, \$810,000.00, or about 89 percent, came from Petrogaz-Haiti and/or Petrogaz-Haiti's owner.
178. PPI received its first significant deposit from Petrogaz-Haiti for \$50,000.00 on April 29, 2022. The ISC received evidence that four days prior, on April 25, 2022, Petrogaz-Haiti hosted a reception for Respondent, and that Respondent met personally with the owner of Petrogaz-Haiti and his wife prior to the reception for a "meet and greet" organized by Mr. Joseph. After Respondent became a Member of Congress, the son of Petrogaz-Haiti's owner was a paid intern in Respondent's congressional office at various times in 2023.
179. Respondent's husband testified that he did not know that PPI received funds from Petrogaz-Haiti but acknowledged that the company name "sounds familiar." He also recalled that the son of Petrogaz-Haiti's owner worked in the congressional office.
180. PPI also raised funds from a handful of other sources. In May 2022, PPI deposited a check from a corporation made out to "Progressive People Inc. PAC." Respondent's husband acknowledged that the deposit signature on the check appeared to be his, but did not recall the check and did not know why it referred to the organization as a "PAC." In June 2022, PPI deposited a \$1,000.00 check from an LLC in North Miami, dated April 30, 2022, with the memo line "Sheila Campaign."
181. T&J also raised funds for Respondent's campaign directly. In October 2021, T&J deposited a check for \$500.00 with a memo line "2021 Campaign." In July 2022, T&J deposited a check for \$500.00 with a memo line "Legislative Campaign." Respondent's campaign staff also informed individuals who wanted to contribute to Respondent's campaign that their contributions should be provided to T&J directly.
182. OCC's Referral to the Committee stated in its findings that T&J wired over \$150,000.00 to a graphics and printing vendor for mailers ordered by Respondent's campaign. Those payments were not reported by the campaign as in-kind expenditures.
183. In response to the OCC Referral, Respondent's counsel noted that the Referral did not suggest that Respondent "participated in or was aware of any transactions" between T&J and her campaign vendor.
184. Respondent's husband testified that "the fact that Truth & Justice paid whomever they paid has nothing to do with Progressive People," and that if T&J used the funds that his organization provided to support his wife's campaign, it was without his knowledge.

185.Regarding T&J making expenditures on behalf of Respondent’s campaign, T&J’s director testified that “[e]verything that I signed off for, to my knowledge, was for the campaign.” Consistent with this assertion, he testified that payments from T&J to Individual 1 were “for campaign expenses” and payments to Respondent’s campaign manager were for “consulting on the campaign.” When asked if T&J had ever paid campaign vendors on behalf of Respondent’s campaign, T&J’s director stated “of course.”

186.When Individual 1 was asked about OCC’s allegations that he caused T&J to make payments to a campaign vendor for Respondent’s campaign, he asserted his Fifth Amendment right against self-incrimination.

187.According to bank records, in 2022, T&J paid the following vendors, entities, and individuals who also provided services to Respondent’s campaign:

Recipient of Payment	Total Amount Received in 2022
Vendor 1	\$18,000.00
EC Firm	\$49,000.00
Edwin Cherfilus	\$179,773.00
Vendor 2	\$150,288.64
Vendor 3	\$24,000.00
Leadership in Action PAC	\$177,500.00
Vendor 4	\$4,500.00
Individual 1	\$34,460.76
Vendor 5	\$17,000.00
Individual 4	\$2,850.00
Vendor 6	\$45,000.00
Vendor 7	\$96,760.00
Respondent’s Campaign Manager	\$25,000.00

188.In addition to funding Respondent’s campaign via funds to T&J, PPI also made direct expenditures to vendors who worked for Respondent’s campaign. For example, PPI’s expenditures in 2022 included a \$1,800.00 payment to HSS, Mr. Roos’ company, for “Website Development.” PPI, which is still an active company according to documents filed with the state of Florida, does not currently have a website. Respondent’s husband told the ISC he did not recall the payment.

189.PPI also gave EC Firm \$20,000.00 on December 21, 2022.

F. Errors and Omissions in Reporting of Sheila Cherfilus-McCormick for Congress, Inc.’s Disbursements and Contributions to the FEC

190.On numerous occasions, Respondent’s campaign committee misreported contributions and expenditures on required FEC filings.

191.Respondent’s original campaign treasurer did not file any reports with the FEC and did not

have access to any campaign committee bank accounts. Mr. Cherfilus, Mr. Roos, and Individual 1 were responsible for Respondent's campaign committee's FEC filings at various points throughout the campaign.

192. All loans received by a campaign committee, including loans from a candidate, must be itemized on the campaign's FEC filings and continuously reported until they are paid off. During the 2021-2022 election campaign, Respondent's campaign committee made numerous reporting errors related to her campaign loans and loan repayments, as described above.
193. Federal campaign finance law requires candidates to report expenditures that exceed \$200.00, or expenditures that aggregate over \$200.00 when added to other disbursements made to the same payee during the same election cycle.
194. Federal campaign finance law requires candidates to report all receipts, including the amount, date, name, and address of the source, subject to certain minimum amounts.
195. During the 2021-2022 election campaign, bank records for Respondent's campaign committee contain over \$275,000.00 in expenditures, excluding unreported payments to Respondent and her entities, that are not reported to the FEC.
196. During the 2021-2022 election campaign, FEC reports for Respondent's campaign committee contain at least \$165,000.00 in disbursements that are not reflected in the campaign committee's bank accounts.
197. The campaign committee misreported disbursements on nearly 170 occasions. Those errors include reporting the incorrect recipient, the incorrect amounts of the disbursement, and/or the incorrect date of the disbursement.
198. Exemplars of the various disbursement reporting errors include the following:
 - a. The campaign committee reported a June 2021 disbursement to a frequently used vendor for \$32,973.00 that is not in the campaign's bank records.
 - b. The campaign committee failed to report a \$12,425.00 disbursement to LIA on July 28, 2021, and failed to report a \$12,425.00 receipt from LIA on August 12, 2021.
 - c. The campaign committee failed to report a May 3, 2021, disbursement for \$6,750.00 and a June 3, 2021, disbursement for \$6,422.37 to AIF for campaign related invoices paid for by SCM Consulting.
 - d. The campaign committee failed to report a September 2021 disbursement for \$30,000.00 to a media advertising vendor.
 - e. The campaign committee reported \$3,538.46 for "legal" to an individual on February 14, 2022. That individual testified she never provided legal services to the campaign.

- f. The campaign committee used Trinity’s office as a campaign office but made no disbursements to Trinity for rent. The campaign committee reported a \$15,000.00 disbursement to EC Firm on June 30, 2021, for “rent.” Bank records indicate that no such payment was made.
199. Campaign committees are required to list the name and address of the depository accounts they maintain for depositing receipts and making disbursements. Campaign committees are required to maintain at least one checking account or transaction account at one of their depositories.
200. Respondent reported on her Statement of Organization that the campaign bank account was held at Financial Institution 5. Respondent did not produce records corresponding to a campaign account from Financial Institution 5. Financial Institution 5 confirmed that Respondent did not have a campaign account with Financial Institution 5, she only had a personal account that was closed in 2020. Instead, Respondent had four bank accounts at Financial Institution 1 for her campaign during the 2021-2022 campaign cycle. Respondent’s campaign did not disclose that it held accounts at Financial Institution 1 to the FEC until May 19, 2023.
201. Campaign committees may maintain a “petty cash fund” for disbursements not in excess of \$100.00 to any person in connection with a single purchase or transaction. A record of all petty cash disbursements must be maintained.
202. Campaign bank records show over \$42,000.00 in withdrawals of cash or checks to cash during the 2021-2022 election cycle.
203. Respondent has not provided an explanation for any of these inaccuracies, or the numerous errors relating to the reported loans from the candidate. Mr. Roos appears to have made several mistakes on reports filed with the FEC; however, Mr. Roos left the campaign in May 2022 and the errors persisted. Mr. Roos did not provide testimony to the ISC and failed to comply with multiple subpoenas.

IV. RESPONDENT’S CAMPAIGN DURING THE 2023-2024 ELECTION CYCLE

204. Respondent filed a Statement of Candidacy for the 2024 general election on May 19, 2023. However, in April 2024, both the primary and general elections for FL-20 were cancelled because Respondent ran unopposed. Respondent was re-elected and began serving her third term in Congress on January 3, 2025.
205. The Committee received two referrals for further review from OCC on September 25, 2023, and May 29, 2024, respectively. Approximately one year after the Committee initiated its investigation into Respondent on September 25, 2024, the campaign committee replaced its treasurer. The campaign hired a professional compliance firm, which took over compliance reporting and treasurer duties.

206. The compliance firm did not conduct an audit of the prior filings and continued to report the candidate loans as previously disclosed, without confirming that the loans were accurately reported.
207. Respondent also did not direct the compliance firm to make corrections to previously filed FEC reports, despite being aware of errors. Although the compliance firm received access to bank accounts that were active when they were filing FEC reports for Respondent's campaign, it took several months to get that access. Some campaign bank accounts were no longer in use, and they never had access to a complete record of bank statements related to prior filings.
208. During the 2023-2024 election cycle, Respondent's campaign utilized three different bank accounts at Financial Institution 1, with Respondent and Mr. Cherfilus as authorized signatories.
209. Respondent's campaign committee reported to the FEC that during the 2023-2024 election cycle, Respondent lent \$5,000.00 to her campaign. This is consistent with the campaign's bank records from Financial Institution 1.
210. Respondent's campaign committee reported to the FEC that during the 2023-2024 election cycle, Respondent's campaign made a total of \$135,000.00 in loan repayments to Respondent over the course of twenty-four repayments. Bank records indicate that the total amount of payments to Respondent during the 2023-2024 cycle was \$138,000.00, including an unreported payment of \$3,000.00 on November 22, 2023. These payments were made to the Joint Account at Financial Institution 1, other than the unreported \$3,000.00 payment, which was made to Respondent's personal account at Financial Institution 2.

V. RESPONDENT'S HOUSE FINANCIAL DISCLOSURE REPORTS

211. Title I of the Ethics in Government Act of 1978 (EIGA), as amended (5 U.S.C. §§ 13101-13111), requires Members, Officers, Candidates, and certain Employees of the House to file FDs with the Clerk of the House.
212. After announcing her candidacy for the 2018 general election, Respondent filed two extension requests regarding her required Candidate FD filing, which resulted in a due date of July 29, 2018.
213. Respondent never filed an FD in relation to the 2018 general election.
214. Respondent filed a Statement of Candidacy for the 2020 general election on October 10, 2019, and her 2020 Candidate FDs were due on November 9, 2019, and May 15, 2020; Respondent did not request any extension of her filing deadlines and did not file any FDs in relation to the 2020 election.
215. Respondent filed a Statement of Candidacy for the 2022 general election on December 31, 2020. Her filing deadline would have been May 15, 2021; Respondent did not file an FD in relation to this candidacy, nor did she request any extension of her filing deadline.

However, Representative Hastings passed away in April 2021, and a special election was held to fill his seat.

216. Respondent's Statement of Candidacy for the special election was filed on June 2, 2021. The deadline to file her Candidate FD for the special election was July 2, 2021.

217. In a statement to the press, Respondent's campaign stated on September 30, 2021, "we are working on the financial disclosure form and have requested an extension in submitting it." Respondent never requested an extension of the filing deadline regarding her 2022 special election Candidate FD. In correspondence from November 19, 2021, between Respondent, Individual 1, and Mr. Cherfilus, Individual 1 stated, "[N]o record can be found of a candidate who's not yet a member being disciplined for withholding the required pre-election disclosure."

218. On December 22, 2021, after she won the Democratic primary for the special election, Respondent filed an FD covering January 1, 2020, through November 30, 2021.

219. Respondent won the special election on January 11, 2022, and was sworn in on January 18, 2022.

220. On January 31, 2022, Respondent was informed her 2018 and 2019 Candidate FDs were overdue but she did not file these FDs.

221. Respondent was granted an extension to file her New Filer Report, which covered January 1, 2020, through December 31, 2021, and timely filed it on August 12, 2022.

222. Respondent won reelection on November 8, 2022.

223. Respondent was granted an extension to file her Annual FD covering 2022 and filed it a day late on August 14, 2023.

224. Respondent likewise requested an extension to file her Annual FD covering 2023; this time, she timely filed it.

225. Respondent further requested an extension to file her Annual FD covering 2024; this FD was also timely filed.

226. Respondent's FDs filed between 2021 and 2023 were prepared with the assistance of an outside law firm. Respondent personally signed each of her FDs.

227. On her FDs, Respondent reported receiving an income of \$86,000.00 from Trinity for both 2020 and 2021. This is generally consistent with the 2020 and 2021 W-2 tax records she received from Trinity for those years.

228. Respondent additionally disclosed a series of "consulting fees" for 2021, specifically:

- a. \$111,720.00 from Trinity
- b. \$500,000.00 from EC Firm
- c. \$5,745,792.96 from SCM Consulting

229. Respondent stated on her FDs that the consulting fees included “profit sharing fees received for work” from Trinity. Respondent has publicly stated that this “represented years of profit-sharing that she was owed” by Trinity. Respondent and Trinity did not identify any agreement indicating Respondent or SCM Consulting was entitled to consulting fees or profit-sharing fees, nor could either party produce any document indicating that SCM Consulting in fact consulted for Trinity.

230. There were various inconsistencies between the income Respondent reported on her FDs, what was reported on tax records, and what bank records show.

231. On her 2021 tax filing, Respondent indicated that she made \$2,169,607.00 in other income, of which \$1,779,882.00 was from SCM Consulting, \$278,005.00 was from EC Firm, and \$111,720.00 was from Trinity.

232. According to the Form 1099-NEC for SCM Consulting from Trinity for 2021, SCM Consulting received \$6,399,936.96 in 2021. Respondent’s tax filing shows Trinity was SCM Consulting’s only client in 2021. Respondent reported receiving \$6,399,936.96 from Trinity but asserted that she incurred \$4,090,291.00 in other expenses that reduced her income to \$1,779,882.00; those expenses were reported to be almost entirely for consulting fees but also included bank fees and software expenses. Respondent did not produce any records showing SCM Consulting engaged other consulting firms, and bank records likewise do not indicate payments to consulting firms for purposes other than her campaign. Respondent also reduced her tax liability by writing off \$1,200,000.00 in charitable contributions that are not reflected in her bank records.

233. The Indictment charged Respondent and her tax preparer with Conspiracy to Make a False and Fraudulent Statement on a Tax Return and Aiding and Assisting a False and Fraudulent Statement on a Tax Return in connection with several of the reported figures described above.

234. According to bank records, SCM Consulting received a total of \$4,439,936.96 from Trinity in 2021, and Respondent directly received a total of \$2,297,360.00 from Trinity in 2021, excluding her regular salary. Respondent deposited checks from Trinity into her personal bank accounts or the SCM Consulting bank account interchangeably, and the checks themselves indicated a variety of purposes. For example, Respondent deposited three checks for “payroll” into the SCM Consulting account; two were deposited on May 14, 2021, and the third on June 11, 2021, each for \$14,280.00. An August 11, 2021, check to SCM Consulting for \$2,400,936.96 deposited in the company’s account at Financial Institution 1 was for “project payment.” Separately, a May 27, 2021, check for \$25,000.00 made out to cash from Trinity and deposited by Respondent into SCM Consulting’s bank account at Financial Institution 1 indicated the payment related to a “50K advance to SCM Group.”

235. Respondent reported a 50 percent ownership interest in EC Firm on her FDs and in her tax filings. Respondent's tax filing indicated her income from EC Firm in 2021 was \$278,005.00.
236. According to bank records, EC Firm received a total of \$823,494.91 from Trinity in 2021, including checks written to Mr. Cherfilus deposited directly with EC Firm, and \$673,354.89 in funds from SCM Consulting. Several of the checks deposited to this account from Trinity were made out to Mr. Cherfilus, including an August 11, 2021, check for \$190,894.91 for "project payment."
237. Trinity maintained a spreadsheet that purported to track the hourly pay of recipients of FDEM funds. The spreadsheet listed SCM Consulting and EC Firm as being paid at a rate of \$40.00 per hour. Based on the total amount Trinity recorded paying to SCM Consulting on its Form 1099, nearly \$6,400,000.00, Respondent would have had to work over 150,000 hours (17 years), to earn SCM Consulting's "consulting" income alone. As all of the funds SCM Consulting received from Trinity were just in 2021, even assuming Respondent worked every hour of 2021, her hourly rate would be approximately \$730.00 per hour (over eighteen times higher than the rate reported by Trinity, and over eight times more than the highest paid rate of \$90.00 per hour). Mr. Cherfilus testified that Respondent received nearly \$6,400,000.00 based "on the profit-sharing percentage."
238. Individuals required to file FDs with the House are required to disclose the value of any ownership interest. For purposes of FDs, an "ownership interest" is an ownership stake in a business or company, including, but not limited to, limited liability companies.
239. Respondent did not accurately report the value of her 50 percent interest in EC Firm. Respondent reported an asset value of \$100,001-\$250,000 for her 50 percent ownership of EC Firm. At the end of November 2021, EC Firm held less than \$100,001 in total assets; at year-end EC Firm had over \$587,260.00 in total assets. If Respondent mistakenly based the value of her 50 percent interest in EC Firm on the total profits for "consulting" from Trinity or her profit listed in EC Firm's tax filing, her share would be valued at \$411,747.46, or \$345,290.00, respectively.
240. Respondent did not accurately report the value of her 100 percent interest in SCM Consulting. Respondent reported an asset value of \$250,001-\$500,000 on both FDs. At the end of both reporting periods, however, SCM Consulting held less than \$250,001 in total assets. If Respondent mistakenly based the value of her interest in SCM Consulting on the total profits for "consulting and profit sharing fees" from Trinity, the value of SCM Consulting would be over \$4,000,000.00.
241. Individuals required to file FDs with the House are required to report transactions exceeding \$1,000.00.
242. Respondent did not list her sale of her interest in EC Firm on Schedule B (Transactions).
243. Individuals who are required to file FDs with the House are required to disclose, among other

accounts, all interest-bearing checking and savings accounts held by the individual, their spouse, or dependent children for which the aggregate value of the accounts is over \$5,000.00 at the end of the reporting period and for which the financial institution has a cash value of more than \$1,000.00. Individuals who are required to file FDs with the House are also required to disclose any account that generated more than \$200.00 interest during the reporting period regardless of the value at the end of the reporting period.

244. Respondent did not disclose interest-bearing accounts at Financial Institutions 1 and 2 that held over \$1,000.00 on Schedule A (Assets and “Unearned” Income) on her FDs, despite holding reportable accounts each filing period.

VI. VOLUNTARY SERVICES PROVIDED TO CONGRESSIONAL OFFICE

245. Respondent was sworn in as a Member of Congress on January 18, 2022.

246. Respondent’s congressional office used the services of Individual 1 from approximately January 2022 through June 2022. Individual 1 was not paid with funds from the Members’ Representational Allowance (MRA) for his work on behalf of the congressional office.

247. In response to OCC’s Referral, Respondent’s counsel asserted: “The newly elected Representative and her novice staff turned to Individual 1 as a trusted and knowledgeable source to seek advice on media activities they themselves were not experienced in navigating. The office was caught unaware that seeking advice from a trusted individual could be construed as a violation of House rules.”

248. Respondent was, or should have been, aware that volunteers are not allowed to perform official work. In her New Member Orientation, Respondent was informed that staff could not perform official work for free. In February 2022, a staffer in Respondent’s congressional office was reminded of the restriction on volunteer services by Committee staff.

249. Individual 1 testified that he “volunteered” for the congressional office. Multiple congressional staffers understood Individual 1 was volunteering with the congressional office. One staffer testified that she “didn’t really understand his role, whether he was official staff or solely a campaign person” because “[i]t was just too involved and engaged in the day-to-day affairs of the congressional office.”

250. Individual 1’s involvement in official activities went far beyond providing advice. He was heavily involved in the production and airing of franked television public service announcements (PSAs), mailers, emails, and radio ads from Respondent’s congressional office and served as a go-between for the office and various media outlets.

251. Individual 1 coordinated at least two franked videos that aired in southern Florida in June 2022. He contacted congressional staff to plan the videos and give the files to the House Communications Standards Commission (CSC) for franking approval. Individual 1 also requested rates and placed the videos with television stations on behalf of the congressional office, provided forms requested by the television stations, collected W-9 forms from the

television stations and provided these to the congressional office for billing, and corresponded with congressional staff regarding payment to these television stations.

252. The franked videos also used content from a subscription service paid for by LIA, the Florida state PAC for which Individual 1 was executive director.
253. Respondent was aware that Individual 1 was involved with the franked videos. In a May 31, 2022, text exchange with a staffer and Individual 1, Respondent actively responded while Individual 1 messaged her regarding the videos, including about obtaining approval from the CSC.
254. Individual 1 assisted with at least two mailers sent by the congressional office in 2022. In March 2022, he emailed PDF and text copies of a newsletter to Respondent, who shared them with her congressional staff. The newsletter stated it was “paid for by official funds authorized by the U.S. House of Representatives.” Individual 1 also contacted congressional staff to determine whether the newsletter was frankable and to discuss payments to a vendor for the newsletter. The March 2022 newsletter was also sent as an email; Individual 1 gave congressional staff a list of 20,000 email addresses of individuals in Broward and Palm Beach counties. In May 2022, Individual 1 instructed congressional staff to make edits to a mailer and corresponded with the vendor regarding printing, providing files, and coordinating where the mailers would be sent.
255. Individual 1 also assisted the congressional office with franked radio advertisements, including a March 2022 PSA campaign for which he obtained pricing information, collected the vendor’s W-9 form, and provided contact information to congressional staff. The radio advertisement aired the week of March 18, 2022.
256. The CSC approved each of the proposed communications. Individual 1 never communicated with CSC directly; instead, he corresponded directly with Respondent’s staffers, and, in some instances, Respondent was involved in those discussions.
257. For each of the franked communications, Respondent’s congressional office reported corresponding disbursements from the MRA to the relevant vendors. This includes \$76,487.50 to television stations for the franked videos, \$97,308.66 to Vendor 2 for the franked mailers, and \$5,043.00 to another vendor for the franked radio advertisement.
258. Individual 1 testified that he “got a commission on everything [he] did with [Vendor 2],” one of the vendors used for the franked communications. For example, on March 14, 2022, Vendor 2 emailed Individual 1 pricing for printing and mailing totaling \$11,212.00 and \$3,525.00, respectively. Individual 1 responded on March 14, 2022, to ask whether the pricing included the “20% addition.” Vendor 2 stated, “No it doesn’t include anything for you.” The next day, March 15, 2022, Vendor 2 said, “FYI, if you want 20%” the prices for printing and mailing would be \$14,015.00 and \$4,406.00, respectively. On March 24, 2022, Individual 1 provided a copy of an invoice and the franked communication to a congressional staffer, stating, “We are good to go. Please submit so we can get the check as soon as possible.” The invoice was billed to “Rep. Sheila Sherfilus-McCormick [sic]” at her office

in Rayburn House Office Building and the total prices reflected the 20 percent commission for Individual 1. Vendor 2 provided records to the Committee, including six invoices matching MRA disbursements to Vendor 2 between March 30, 2022, through June 13, 2022, totaling \$97,308.66. Vendor 2 informed the ISC that after each disbursement from the MRA, “[Vendor 2] sent [Individual 1] a check” representing 20 percent of each disbursement.

259. Individual 1’s involvement in the congressional office also went beyond franked communications. He aided in drafting Respondent’s House biography, was involved in discussions regarding Respondent’s official schedule, assisted in planning or preparing for official events, handled media requests, drafted media statements on official activities, drafted a list of priorities for Respondent’s committee work, reviewed legislative language, and worked on setting up a “mobile office.” As discussed further below, he was also involved in community project funding appropriations requests.

VII. SPECIAL FAVORS IN CONNECTION WITH COMMUNITY PROJECT FUNDING REQUESTS

260. Respondent showed interest in Community Project Funding (CPF) as early as November 2021, when a campaign staffer provided research on how to “get earmarks in bills.”

261. For Fiscal Year 2023 (FY23), Members could submit CPF requests beginning on April 4, 2022. The submission deadlines varied by subcommittee of the House Appropriations Committee (Appropriations) and fell between April 27, 2022, and April 29, 2022.

262. Members were limited to 15 CPF requests and were required to certify that neither they nor their immediate families had any financial interest in the projects they submitted. Members were also asked to provide Appropriations with priority rankings for their submitted CPF requests.

263. On December 29, 2022, the 2023 Consolidated Appropriations Act, which contained the FY2023 CPF, was signed into law. CPF funds were distributed thereafter.

a. Michael Joseph

264. Mr. Joseph, then a North Miami Beach commissioner, was a “supporter” and friend of Respondent’s who helped fundraise for her campaign.

265. From February 22, 2022, to December 16, 2024, Mr. Joseph served as treasurer of Respondent’s Leadership PAC, Protecting Democracy. Protecting Democracy reported to the FEC that it received \$13,300.00 in contributions and made \$5,000.00 in disbursements between July 2022 to October 2024. Protecting Democracy’s bank statements show that some contributions were not reported or were misreported.

266. On April 12, 2022, a legislative staffer attended a meeting in the campaign office with Individual 1 and Mr. Joseph. The legislative staffer understood the purpose of the meeting to be “to tell [the staffer] which projects [] had to be submitted [to] [A]ppropriations.”

267. Mr. Joseph and Individual 1 “ordered” the legislative staffer to submit the following CPF requests to Appropriations:

Organization	Project Name	Amount Requested
Catholic Charities of the Archdiocese of Miami, Inc.	Housing Stability and Homelessness Prevention	\$3,860,461.00
Community Brainstorming Alliance, Inc.	Financial Literacy X Creative Mindset	\$1,700,000.00
Haitian Lawyers Association (HLA)	HLA’s Community Outreach	\$2,500,000.00
Hemp4Water Inc.	Stop the Algae	\$5,000,000.00
MorseLife Health System	Economically Depressed Region of Palm Beach County	\$500,000.00
Spearhead Affordable Homes of Florida	Washington Park Broward County	\$5,000,000.00

268. On April 25, 2022, the legislative staffer emailed Respondent a chart containing CPF requests from “organizations [Respondent] wanted funded” and “organizations [the legislative staffer] thought were worthy.” Two entries in the chart had “Mike” written next to them to indicate that those were projects recommended by Mr. Joseph and Individual 1, according to the staffer.

269. Underneath the chart were four additional projects under the heading “Recommended by Mike,” also referring to Mr. Joseph, because the legislative staffer “wanted to be very clear that those were recommended by [Individual 1] and Mike.” Two of those organizations and/or projects were noted as being located outside of Respondent’s district.

270. The legislative staffer researched one of the recommended projects and found that “the owner of the website had just launched this website to do this project” and “[t]here were a number of grammatical errors on the letters of recommendation that were submitted.” She informed Respondent that the project looked “fictitious” and recommended that Respondent not submit it. Respondent did not submit that particular CPF request to Appropriations.

271. The legislative staffer also recommended that Respondent not submit another recommended CPF request “because it did not meet the requirements.” She explained to Respondent that if a CPF request is submitted to Appropriations and rejected, Respondent would not be able to replace it with another request.

272. After finding out that the legislative staffer had not recommended some of his projects, Mr. Joseph called Respondent’s then-Deputy Chief of Staff to complain. Later that day, Respondent called the legislative staffer and informed her that Mr. Joseph was Respondent’s friend, he “was not going anywhere,” and that she needed to apologize to Mr. Joseph.

273. Respondent submitted 15 CPF requests to Appropriations. Three of these requests were projects identified by Mr. Joseph and Individual 1.
274. Respondent disregarded the legislative staffer's recommendation regarding one of the projects recommended by Mr. Joseph and instructed her to submit the request to Appropriations, which she did. It was not accepted for consideration by Appropriations because it did not meet the criteria.
275. Respondent also submitted the two projects recommended by Mr. Joseph that the legislative staffer included on her list of "worthy" projects, both of which were accepted and ultimately received funding grants.

b. Foundation 1 CPF

276. In 2022 and 2023, Individual 3 was President or CEO of Entity 1, d/b/a Entity 2, and Foundation 1.
277. At Respondent's direction, on February 4, 2022, a legislative staffer contacted Individual 3 regarding the CPF process. Respondent asked the legislative staffer to reach out because "it was a priority for [Respondent] to make sure that they understand the process and they do submit a request." Respondent did not ask the legislative staffer to pre-emptively reach out to anyone else regarding the CPF process. Individual 3 testified he did not remember anyone from the congressional office reaching out to him regarding CPFs.
278. Foundation 1 timely submitted a CPF request for \$5,000,000.00 for tablets for telemedicine (the Foundation 1 CPF request). Respondent treated the Foundation 1 CPF request differently than other requests; for example, Respondent frequently texted the legislative staffer about the Foundation 1 CPF request and asked that the legislative staffer e-mail her the final submitted Foundation 1 CPF application.
279. On April 26, 2022, Respondent informed the legislative staffer that she wanted to submit the Foundation 1 CPF request to Appropriations. On the CPF priority list submitted to Appropriations, Respondent ranked the Foundation 1 CPF request sixth. The Foundation 1 CPF request was accepted by Appropriations and Foundation 1 was ultimately awarded \$2,200,000.00.
280. Individual 3 testified that he was "not too confident" that the Foundation 1 CPF request would be awarded and that he had not received any promises from Respondent related to whether the Foundation 1 CPF request would be accepted.
281. On June 20, 2022, Respondent's campaign reached out to Entity 2 regarding utilizing their text messaging services on behalf of the campaign. Entity 2 first sent a text on behalf of the campaign on June 24, 2022, with an 8-week text campaign expected to follow. Ultimately, Respondent's campaign utilized Entity 2's services for at least four months in 2022 (June, July, August, and November) and again in September 2023.

282. Respondent's campaign has not made any disbursements to Entity 2 or any other company related to Individual 3.
283. Beginning with its July 2024 quarterly report, Respondent's campaign reported owing a \$4,500.00 debt to Entity 2 for Multimedia Messaging Services.
284. Respondent's congressional office also utilized Entity 2 for Multimedia Messaging Services from February through November 2023. Respondent's office has paid Entity 1 a total of \$50,000.00 (at a flat rate of \$5,000.00 per month) in official MRA funds for unlimited multimedia messaging.

ALLEGED VIOLATIONS

Campaign Finance-Related Violations

285. According to the *House Ethics Manual (Ethics Manual)*, "a Member or employee must take reasonable steps to ensure that any outside organization over which he or she exercises control – including the individual's own authorized campaign committee or, for example, a 'leadership PAC' – operates in compliance with applicable law."

286. The *Ethics Manual* further states:

While [FECA] and other statutes on campaign activity are not rules of the House, Members and employees must also bear in mind that the House Rules require that they conduct themselves 'at all times in a manner that shall reflect creditably on the House' (House Rule 23, clause 1). In addition, the Code of Ethics for Government Service, which applies to House Members and staff, provides in ¶ 2 that government officials should '[u]phold the Constitution, laws and legal regulations of the United States and of all governments therein and never be a party to their evasion.' Accordingly, in violating FECA or another provision of statutory law, a Member or employee may also violate these provisions of the House rules and standards of conduct.

287. House Rule XV, clause 5 prohibits House Members and staff from accepting any gift except as specifically provided in the Rule. One of the gifts that Members and staff may accept under a provision of the rule (clause 5(a)(3)(B)) is "[a] contribution, as defined in section 301(8) of [FECA] that is lawfully made under that Act." Accordingly, acceptance of an unlawful contribution under FECA may be acceptance of an improper gift in violation of House Rules.

288. 52 U.S.C. § 30125(e)(1)(A) provides:

A candidate, individual holding Federal office, agent of a candidate or an individual holding Federal office, or an entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of 1

or more candidates or individuals holding Federal office, shall not—

(A) solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act.

289.52 U.S.C. § 30116(a)(1)(A) provides, “no person shall make contributions [] to any candidate and his authorized political committee with respect to any election for Federal office, which, in the aggregate” exceeds a statutorily proscribed amount. In the 2022 election, the federal contribution limit was \$2,900.00. In the 2024 election, the federal contribution limit was \$3,300.00.

290.52 U.S.C. § 30116(a)(7)(B) provides, “expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents, shall be considered to be a contribution to such candidate.”

291.52 U.S.C. § 30122 provides, “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.”

292. The FEC is an independent regulatory agency within the executive branch of the United States Government whose purpose is to enforce campaign laws in United States federal elections.

293. Candidates for federal office are generally permitted to make unlimited contributions to their campaigns from “personal funds.” See 11 C.F.R. § 110.10. According to 11 C.F.R. § 100.33 and 52 U.S.C. § 30101(26), personal funds of a candidate include:

(a) *Assets*. Amounts derived from any asset that, under applicable State law, at the time the individual became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had—

- (1) Legal and rightful title; or
- (2) An equitable interest;

(b) *Income*. Income received during the current election cycle, of the candidate, including:

- (1) A salary and other earned income that the candidate earns from bona fide employment;
- (2) Income from the candidate’s stocks or other investments including interest, dividends, or proceeds from the sale or liquidation of such stocks or investments;
- (3) Bequests to the candidate;
- (4) Income from trusts established before the beginning of the election cycle;

- (5) Income from trusts established by bequest after the beginning of the election cycle of which the candidate is the beneficiary;
- (6) Gifts of a personal nature that had been customarily received by the candidate prior to the beginning of the election cycle; and
- (7) Proceeds from lotteries and similar legal games of chance; and

(c) *Jointly owned assets.* Amounts derived from a portion of assets that are owned jointly by the candidate and the candidate's spouse as follows:

- (1) The portion of assets that is equal to the candidate's share of the asset under the instrument of conveyance or ownership; provided, however,
- (2) If no specific share is indicated by an instrument of conveyance or ownership, the value of one-half of the property.

294.11 C.F.R. § 100.52(a) provides, “[a] gift, subscription, loan (except for a loan made in accordance with 11 CFR 100.82 and 100.83), advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office is a contribution.” The term “anything of value” includes all in-kind contributions.

295.11 C.F.R. § 104.3(a)(3)(vii)(B) provides, “[a]n authorized committee of a candidate for Federal office shall report the total amount of receipts received during the reporting period and, except for itemized and unitemized breakdowns, during the election cycle . . .” for “[l]oans made, guaranteed, or endorsed by a candidate to his or her authorized committee”

296.11 C.F.R. § 104.3(a)(4)(i) provides each report must disclose:

Each person, other than any political committee, who makes a contribution to the reporting political committee during the reporting period, whose contribution or contributions aggregate in excess of \$200 per calendar year (or per election cycle in the case of an authorized committee), together with the date of receipt and amount of any such contributions, except that the reporting political committee may elect to report such information for contributors of lesser amount(s) on a separate schedule.

297.11 C.F.R. § 104.3(b) provides, “[e]ach report filed under § 104.1 shall disclose the total amount of all disbursements for the reporting period and for the calendar year (or for the election cycle, in the case of an authorized committees) and shall disclose the information set forth at paragraphs (b)(1) through (b)(4) of this section.”

298.11 C.F.R. § 104.3(d) provides, “[e]ach report filed under 11 CFR 104.1 shall, on Schedule C or D, as appropriate, disclose the amount and nature of outstanding debts and obligations owed by or to the reporting committee” and the FEC’s Campaign Guide for Congressional Candidates and Committees (2014) states that “[d]ebts and obligations must be reported continuously until repaid.”

- 299.11 C.F.R. § 109.20 provides, “[a]ny expenditure that is coordinated within the meaning of paragraph (a) of this section [regarding communications] . . . is either an in-kind contribution to, or a coordinated party expenditure with respect to, the candidate or political party committee with whom or with which it was coordinated and must be reported as an expenditure made by that candidate or political party committee”
- 300.11 C.F.R. § 300.61 provides, “[n]o [Federal candidate or officeholder] shall solicit, receive, direct, transfer, spend, or disburse funds in connection with an election for Federal office, including funds for any Federal election activity . . . unless the amounts consist of Federal funds that are subject to the limitations, prohibitions, and reporting requirements of the Act.”
- 301.52 U.S.C. § 30114(b) prohibits the conversion of campaign funds to personal use. Under FEC regulations implementing FECA’s prohibition on the personal use of campaign funds, a third party’s payment of a candidate’s expenses that would otherwise be deemed a personal use is considered a contribution by the third party unless the payment would have been made “irrespective of the candidacy.” 11 C.F.R. § 113.1(g).
- 302.A false representation is made knowingly and willfully where “the defendant acted deliberately and with knowledge that the representation was false.” This conclusion may be inferred where there is an “elaborate scheme for disguising [the] corporate political contributions.” *United States v. Hopkins*, 916 F.2d 207, 214–15 (5th Cir. 1990) (“The jury was entitled to infer from the defendants’ elaborate scheme for disguising their corporate political contributions that the defendants deliberately conveyed information they knew to be false to the Federal Election Commission.”).

COUNT 1: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Conduit Funds from Trinity Health Care Services, LLC

- 303.Paragraphs 16 through 67, 104 through 107, and 285 through 302 are incorporated by reference as if fully set forth herein.
- 304.Between March 20, 2021, and September 6, 2024, Respondent made \$6,014,325.39 in loans to her campaign committee according to bank records for her personal and SCM Consulting bank accounts held at Financial Institution 1 and Financial Institution 2.
- 305.Respondent did not have sufficient personal funds with which to make these loans. Respondent’s historical annual salary from Trinity was approximately \$86,000.00. Respondent’s company, SCM Consulting, did not exist prior to 2021.
- 306.Trinity received \$14,355,778.28 from FDEM. Trinity was not entitled to at least \$5,778,316.45 in funds from FDEM. Respondent and her single-member LLC, SCM Consulting, received at least \$6,682,776.96 from Trinity in 2021, excluding payments from Trinity for Respondent’s salary.

307. There are no agreements or other evidence indicating Respondent had a legal title or equitable interest in the funds Trinity received from FDEM outside of her salary in her role as CEO of Trinity.
308. The timing and flow of funds transferred from Trinity to Respondent and SCM Consulting indicate the funds were transferred for the purpose of financing Respondent's election campaign.
309. Respondent's ability to make loans to her campaign was based on money obtained from Trinity to which she was not entitled.
310. Respondent thus caused her campaign to receive significant excessive corporate contributions from Trinity, falsely reported as personal contributions from the candidate, in violation of campaign finance laws and regulations.
311. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.
312. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 2: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Improper Contributions Falsely Reported as Personal Loans

313. Paragraphs 16 through 67, 84 through 86, 104 through 107, and 285 through 312 are incorporated by reference as if fully set forth herein.
314. Between June 1, 2021, and May 11, 2022, Respondent's campaign committee received \$208,828.00 in contributions made by Trinity and EC Firm (after Respondent's Separation Agreement) in support of her campaign and in excess of the contribution limits and in violation of restrictions on corporate contributions. Respondent knew that these transfers of funds to the campaign committee were used in support of the campaign or to create the appearance of a financially strong campaign.
315. Respondent falsely reported \$100,007.00 of these contributions as personal loans of the candidate. Respondent's campaign did not report the remaining contributions made by Trinity and EC Firm (after Respondent's Separation Agreement).
316. Respondent's campaign committee improperly reported these contributions as loans on some or all of 60 reports filed with the FEC.

317. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

318. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 3: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Failure to Properly Disclose Loans Obtained in Support of Campaign

319. Paragraphs 16 through 67 and 285 through 318 are incorporated by reference as if fully set forth herein.

320. Between September 29, 2021, and March 2, 2023, Respondent's campaign committee did not disclose to the FEC at least \$903,000.00 in loans made by Respondent in support of her campaign.

321. Respondent's campaign committee falsely stated that she made \$493,793.56 in personal loans when the reported loans had not been made. These loans were improperly reported to the FEC on some or all of 60 reports filed with the FEC.

322. Respondent knew that these transfers of funds to the campaign committee were used in support of the campaign or to create the appearance of a financially strong campaign.

323. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

324. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditability upon the House and violated House Rule XXIII, clause 1.

COUNT 4: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Failure to Disclose Payments from the Campaign to Respondent

325. Paragraphs 68 through 79, 210, and 285 through 302 are incorporated by reference as if fully set forth herein.

326. Between June 28, 2021, and November 22, 2023, Respondent's campaign committee failed to disclose \$315,928.00 in loan repayments to Respondent. Respondent did not take any steps to correct the failure to report these repayments.

327. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

328. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 5: Failure to Uphold the Laws and Regulations of the United States

Acceptance of Improper Campaign Contributions from Edwin Cherfilus

329. Paragraphs 80 through 89 and 285 through 302 are incorporated by reference as if fully set forth herein.

330. Respondent's campaign committee received improper contributions from Mr. Cherfilus, paid either directly to the campaign or to campaign vendors on behalf of the campaign.

331. Respondent's campaign further benefited from funds Mr. Cherfilus gave to PACs that made payments to campaign vendors on behalf of Respondent's campaign.

332. The funds from Mr. Cherfilus were not properly reported to the FEC and were in excess of contribution limits.

333. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Service.

COUNT 6: Failure to Uphold the Laws and Regulations of the United States

Acceptance of Improper Contributions from Respondent's Sister

334. Paragraphs 80, 90 through 103, and 285 through 302 are incorporated by reference as if fully set forth herein.

335. Respondent and/or her campaign benefited from funds Respondent's sister gave to PACs that made payments to campaign vendors on behalf of Respondent's campaign and paid for the Pre-Swearing-In Event .

336. Respondent's campaign further benefited from a straw donor contribution from Ms. LeBlanc, paid for by Respondent's sister.

337. The funds from Respondent's sister were not properly reported to the FEC and were in excess of contribution limits.

338. By engaging in the conduct described above, Respondent failed to uphold the laws and

regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Service.

COUNT 7: Failure to Uphold the Laws and Regulations of the United States

Acceptance of Improper Campaign Contributions from Nadege LeBlanc

339. Paragraphs 80, 90 through 103, and 285 through 302 are incorporated by reference as if fully set forth herein.
340. Respondent's campaign benefited from funds Ms. LeBlanc gave to NHAEON PAC that were used to make payments to campaign vendors on behalf of Respondent's campaign.
341. The funds from Ms. LeBlanc were not reported to the FEC and were in excess of contribution limits.
342. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Service.

COUNT 8: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Conduit Funds from Petrogaz-Haiti, S.A., LLC

343. Paragraphs 80, 153 through 189, and 285 through 302 are incorporated by reference as if fully set forth herein.
344. From April 29, 2022 (four days after a "meet and greet" with Respondent), to October 18, 2022, Petrogaz-Haiti and its owner transferred \$810,000.00 to PPI, an organization controlled by Respondent's husband and the treasurer of her Leadership PAC. PPI funneled the majority of those funds to T&J, an organization controlled by Respondent's senior campaign advisor, and T&J spent those funds for the benefit of Respondent's campaign.
345. There are no agreements or other evidence indicating Respondent was entitled to any funds from Petrogaz-Haiti, PPI, or T&J; nor were any designated as an entity that could make expenditures on behalf of a federal campaign.
346. The funds from Petrogaz-Haiti were clearly provided for the purpose of financing Respondent's election campaign and thus constitute an impermissible corporate contribution. Respondent's campaign would not have had sufficient funds to pay the vendors paid with funds originating from Petrogaz-Haiti on the campaign's behalf.
347. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics

for Government Services.

348. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 9: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Acceptance of Improper Campaign Contributions from Leadership in Action PAC (LIA)

349. Paragraphs 80, 108 through 124, and 285 through 302 are incorporated by reference as if fully set forth herein.

350. Respondent's campaign committee received improper contributions from LIA, paid to campaign vendors and staff on behalf of the campaign, in coordination with the campaign.

351. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Service.

COUNT 10: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Acceptance of Improper Campaign Contributions from Haitian American Votes PAC (HAV PAC)

352. Paragraphs 80, 137 through 143, and 285 through 302 are incorporated by reference as if fully set forth herein.

353. Respondent's campaign committee received unreported in-kind contributions from HAV PAC in excess of contribution limits through payments HAV PAC made to campaign vendors on behalf of the campaign, including after Respondent became a Member of Congress.

354. By engaging in the conduct describe above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Service.

355. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 11: Failure to Uphold the Laws and Regulations of the United States

Acceptance of Improper Contributions from NHAEON

356. Paragraphs 80, 125 through 136, and 285 through 302 are incorporated by reference as if fully set forth herein.

357. Respondent and/or her campaign received unreported in-kind contributions from NHAEON in excess of contribution limits through payments NHAEON made to vendors on behalf of the campaign and/or for the benefit of Respondent.
358. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Service.

COUNT 12: Failure to Uphold the Laws and Regulations of the United States

Acceptance of Improper Campaign Contributions from NHAEON Progressive Political Action Committee

359. Paragraphs 80, 128 through 136, and 285 through 302 are incorporated by reference as if fully set forth herein.
360. Respondent's campaign committee received unreported in-kind contributions from NHAEON PAC in excess of contribution limits through payments NHAEON PAC made to campaign vendors on behalf of the campaign, including after Respondent became a Member of Congress.
361. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Service.

COUNT 13: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Additional Reporting Errors Related to Campaign Contributions and Disbursements

362. Paragraphs 190 through 210 and 285 through 302 are incorporated by reference as if fully set forth herein.
363. From September 29, 2021, to August 19, 2022, Respondent's campaign improperly reported over a dozen payments designated as loans to the campaign not already described in the above counts. These errors included reporting the incorrect amount and/or date of the loan and improperly consolidating individual loans made on separate dates.
364. Between July 2, 2021, and October 21, 2022, Respondent's campaign committee improperly reported three loan repayments not described in the above counts. These errors included reporting cash withdrawals that could not be identified as deposited in Respondent's bank accounts as loan repayments and incorrect repayment amounts.
365. Respondent's campaign committee made numerous other reporting errors including: failing to report disbursements that were actually made; reporting disbursements that were not made; improperly reporting disbursements; improperly reporting receipts; failing to report

expenditures by Respondent as campaign expenses; failing to report in-kind contributions; and filing reports with the FEC containing those errors.

366. Respondent did not take any meaningful steps to correct these reporting errors, or provide her new compliance firm with sufficient records or direction to make corrections.

367. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

368. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 14: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

False Reports Filed with the FEC

369. Paragraphs 43 through 210 and 285 through 368 are incorporated by reference as if fully set forth herein.

370. Respondent's campaign committee filed at least 60 reports with the FEC containing inaccurate information between December 30, 2021, and April 15, 2025. Respondent knew or should have known that these reports were not accurate.

371. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of FECA and the FEC's implementing regulations, and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

372. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 15: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States

Money Laundering – Trinity Funds

373. Paragraphs 16 through 189, 285 through 342, and 349 through 361 are incorporated by reference as if fully set forth herein.

374. 18 U.S.C. § 1957 provides, “[w]hoever . . . knowingly engages or attempts to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from specified unlawful activity, shall be punished as provided in subsection (b).”

375. Trinity received millions of dollars in funds from FDEM to which it was not entitled.

Respondent and Mr. Cherfilus caused those funds to be transferred to various bank accounts at Financial Institution 1 and Financial Institution 2 in their names and their companies' names. Those funds were then transferred to Respondent's campaign bank accounts at Financial Institution 1 or used by Respondent and Mr. Cherfilus on personal or campaign expenses.

376. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

377. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 16: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States
Money Laundering – Petrogaz-Haiti S.A., LLC Funds

378. Paragraphs 80, 153 through 189, 285 through 302, 343 through 348, and 374 are incorporated by reference as if fully set forth herein.

379. Petrogaz-Haiti funneled impermissible corporate contributions to Respondent's campaign. Respondent's closest advisors and husband set up PPI and T&J as shell companies to conceal the source of the funds used to make significant expenditures for the benefit of Respondent's campaign.

380. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

381. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

COUNT 17: Conduct that Does Not Reflect Creditably on the House and Failure to Uphold the Laws and Regulations of the United States
False Statements

382. Paragraphs 43 through 210 and 285 through 381 are incorporated by reference as if fully set forth herein.

383. 18 U.S.C. § 1001(a)(3) provides, "whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully . . . makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry . . . shall be fined under this

title”

384. Respondent had knowledge that some or all information identified as inaccurately disclosed in numerous FEC reports filed on behalf of her campaign were false. Respondent caused her campaign to submit false records to the FEC regarding campaign loans, contributions, and other information related to the campaign’s finances and did not provide accurate information to those on the campaign responsible for making such filings.

385. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

386. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

**COUNT 18: Conduct that Does Not Reflect Creditably on the House and Violates the
Letter and Spirit of House Rules**
Comingling of Campaign and Personal Funds

387. Paragraphs 16 through 79, 104 through 107, 144 through 152, 190 through 210, and 285 through 302 are incorporated by reference as if fully set forth herein.

388. House Rule XXIII, clause 6 states that a Member:

- (a) shall keep the campaign funds of such individual separate from the personal funds of such individual;
- (b) may not convert campaign funds to personal use in excess of an amount representing reimbursement for legitimate and verifiable campaign expenditures; and
- (c) except as provided in clause 1(b) of rule XXIV, may not expend funds from a campaign account of such individual that are not attributable to bona fide campaign or political purposes.

389. Respondent received campaign funds without reporting those payments to the FEC and used personal funds to make payments on behalf of her campaign, including after Respondent became a Member of Congress.

390. By engaging in the conduct described above, Respondent violated House Rule XXIII, clause 6.

391. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and did not adhere to the letter and spirit of the Rules of the

House, and violated House Rule XXIII, clauses 1 and 2.

Financial Disclosure Violations

392. The EIGA, incorporated into the House Rules by House Rule XXVI, requires all Members to file FDs.
393. The EIGA further requires qualifying candidates to file FDs with the House. A qualified candidate refers to an individual that has raised or spent more than \$5,000.00 as a candidate in a campaign for election to the House of Representatives.
394. Section 104 of the EIGA requires a “full and complete statement” with respect to several categories, including generally: income and honoraria; unearned income including dividends, rents, interest and capital gains; gifts; property used in trade or business or held for investment or the production of income; liabilities; transactions; and reportable positions.
395. Section 106 of the EIGA states that “each congressional ethics committee . . . shall refer to the Attorney General the name of any individual which such [] committee has reasonable cause to believe has willfully failed to file a report or has falsified or willfully failed to file information required to be reported.” This section further states, “[t]he Attorney General may bring a civil action . . . against any individual who knowingly and willfully falsifies or who knowingly and willfully fails to file or report any information that such individual is required to report” and can impose a civil penalty.
396. The Commission on Administrative Review of the 95th Congress stated, “[t]he objectives of financial disclosure are to inform the public about the financial interests of government officials in order to increase public confidence in the integrity of government and to deter potential conflicts of interest.”
397. The House’s Financial Disclosure Guide instructs that when an individual qualifies as a candidate, they must file an FD “within 30 days of becoming a candidate or May 15 of that year, whichever is later.” Additionally, “a qualifying candidate must file no later than 30 days before any election (including primaries) in which the individual is participating.”

COUNT 19: Failure to Uphold the Laws and Regulations of the United States

Failure to File FD in Connection with the 2018 Election

398. Paragraphs 211 through 244 and 392 through 397 are incorporated by reference as if fully set forth herein.
399. Respondent was aware of the requirement for candidates to file a Candidate FD, and received two extensions to file by July 29, 2018, but did not file her Candidate FD.
400. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of the EIGA and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

COUNT 20: Failure to Uphold the Laws and Regulations of the United States
Failure to File FDs in Connection with the 2020 Election

401. Paragraphs 211 through 244 and 392 through 397 are incorporated by reference as if fully set forth herein.
402. Respondent's deadlines to file Candidate FDs related to the 2020 election were November 10, 2019, and May 15, 2020.
403. Respondent was aware of the requirement for candidates to file Candidate FDs but did not do so in either 2019 or 2020.
404. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of the EIGA and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

COUNT 21: Conduct that Reflects Discreditably Upon the House and Violates the Letter and Spirit of House Rules
Failure to Timely File FDs After Becoming a Member of Congress

405. Paragraphs 211 through 244 and 392 through 404 are incorporated by reference as if fully set forth herein.
406. After becoming a Member of Congress, Respondent was informed that she had not filed her Candidate FDs. Respondent did not subsequently file the required disclosures.
407. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of the EIGA and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.
408. By engaging in the conduct described above, Respondent violated House Rule XXVI.
409. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and did not adhere to the letter and spirit of the Rules of the House, and violated House Rule XXIII, clauses 1 and 2.

COUNT 22: Conduct that Reflects Discreditably Upon the House, Violates the Letter and Spirit of House Rules, and Failure to Uphold the Laws and Regulations of the United States
Failure to Timely File FDs in Connection with the 2022 Special Election

410. Paragraphs 211 through 244 and 392 through 397 are incorporated by reference as if fully set forth herein.
411. Respondent's deadline to file her Candidate FD related to the 2022 special election was July

2, 2021.

412. Respondent was aware of the requirement for candidates to file Candidate FDs but did not do so until after she won the primary in the 2022 special election, months after her filing deadline. Respondent therefore did not give her constituents the opportunity to review her financial interests prior to becoming the Democratic nominee for the House.
413. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of the EIGA and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.
414. By engaging in the conduct described above, Respondent violated House Rule XXVI.
415. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and did not adhere to the letter and spirit of the Rules of the House, and violated House Rule XXIII, clauses 1 and 2.

COUNT 23: Conduct that Reflects Discreditably Upon the House, Violates the Letter and Spirit of House Rules, and Failure to Uphold the Laws and Regulations of the United States
Reporting Errors and Omissions on FDs

416. Paragraphs 211 through 244 and 392 through 397 are incorporated by reference as if fully set forth herein.
417. Respondent engaged in a pattern of submitting FDs that were incomplete and inaccurate.
418. Respondent's FDs contained numerous errors and omissions, including related to: earned income, assets, bank accounts, and compensation accrued for personally performed services. Respondent's financial interests would have been misleading even if they had been accurately reported because, as described above, Respondent failed to provide any evidence demonstrating she was entitled to nearly any of the funds she received from Trinity.
419. Respondent failed to ensure that the information reported on her FDs was accurate or complete.
420. Respondent's errors and omissions on her FDs were knowing and willful.
421. Respondent failed to put forth a full and complete statement of items required by the EIGA.
422. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States, including provisions of the EIGA and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.
423. By engaging in the conduct described above, Respondent violated House Rule XXVI.
424. By engaging in the conduct described above, Respondent acted in a manner that does not

reflect creditably on the House and did not adhere to the letter and spirit of the Rules of the House, and violated House Rule XXIII, clauses 1 and 2.

Violations Relating to Official Resources

COUNT 24: Conduct that Reflects Discreditably Upon the House, Violates the Letter and Spirit of House Rules, and Failure to Uphold the Laws and Regulations of the United States *Acceptance of Voluntary Services for Official Work by Individual 1*

425. Paragraphs 245 through 259 are incorporated by reference as if fully set forth herein.
426. 31 U.S.C. § 1342 provides, “[a]n officer or employee of the United States Government or of the District of Columbia government may not accept voluntary services for either government or employ personal services exceeding that authorized by law except for emergencies involving the safety of human life or the protection of property.”
427. House Rule XXIII, clause 8(a) provides, “[a] Member . . . may not retain an employee who does not perform duties for the offices of the employing authority commensurate with the compensation such employee receives.”
428. House Rule XXIV, clause 1(a) provides, “[a] Member . . . may not maintain, or have maintained for the use of such individual, an unofficial office account.” This applies to accounts maintained by third parties for a Member’s benefit, even if they are not maintained for the Member’s direct use. It also applies to any process whereby funds are received or expended regardless of whether an actual account or repository is maintained. Therefore, the rule prohibits private, in-kind contributions of goods or services for official purposes, with limited exceptions.
429. Respondent accepted services from Individual 1, who was not employed by the congressional office, including related to: scheduling and preparing for official events, responding to media requests, providing research on official rules, reviewing draft legislation, and assisting in the appropriations process.
430. Respondent was aware that she was not allowed to accept volunteer services for official work.
431. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.
432. By engaging in the conduct described above, Respondent violated House Rule XXIII, clause 8(a).
433. By engaging in the conduct described above, Respondent violated House Rule XXIV, clause 1(a).

434. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and did not adhere to the letter and spirit of the Rules of the House, and violated House Rule XXIII, clauses 1 and 2.

COUNT 25: Conduct that Reflects Discreditably Upon the House, Violates the Letter and Spirit of House Rules, and Failure to Uphold the Laws and Regulations of the United States
Acceptance of Voluntary Services Related to Franked Communications by Individual 1

435. Paragraphs 245 through 259 and 425 through 434 are incorporated by reference as if fully set forth herein.

436.2 U.S.C. § 503(d) provides, “[n]o Senator or Member of the House of Representatives may maintain or use, directly or indirectly, an unofficial office account or defray official expenses for franked mail, employee salaries, office space, furniture, or equipment and any associated information technology services (excluding handheld communications devices) from—(1) funds received from a political committee or derived from a contribution or expenditure; . . . or (3) any other funds that are not specifically appropriated for official expenses.”

437. House Rule XXIV, clause 1(b)(2) prohibits the use of unofficial funds “to defray official expenses for mail or other communications, compensation for services, office space, office furniture, office equipment, or any associated information technology services (excluding handheld communications devices).”

438. House Rule XXIV, clause 6, provides, “[a] mass mailing that is otherwise frankable by a Member . . . is not frankable unless the cost of preparing and printing it is defrayed exclusively from funds made available in an appropriation Act.”

439. Respondent accepted services from Individual 1, who was not employed by the congressional office, related to franked communications.

440. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States and was a party to their non-compliance, in violation of ¶ 2 of the Code of Ethics for Government Services.

441. By engaging in the conduct described above, Respondent violated House Rule XXIV, clauses 1(b)(2) and 6.

442. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and did not adhere to the letter and spirit of the Rules of the House, and violated House Rule XXIII, clauses 1 and 2.

COUNT 26: Conduct that Reflects Discreditably Upon the House, Violates the Letter and Spirit of House Rules, and Failure to Uphold the Laws and Regulations of the United States
Providing Special Favors and Privileges in Connection with Community Project Funding Requests

443. Paragraphs 260 through 284 are incorporated by reference as if fully set forth herein.

444. 5 U.S.C. § 7353 provides, “[n]o Member of Congress . . . shall solicit or accept anything of value from a person [] . . . (2) whose interests may be substantially affected by the performance or nonperformance of the individual’s official duties.”

445. The Code of Ethics for Government Service, ¶ 5 provides:

Any person in government service should . . . [n]ever discriminate unfairly by the dispensing of special favors or privileges to anyone, whether for remuneration or not; and never accept, for himself or his family, favors or benefits under circumstances which might be construed by reasonable persons as influencing the performance of his governmental duties.

446. Respondent provided special favors and privileges by directing her staff to treat CPF requests from Individual 3 and Mr. Joseph more favorably than other submissions.

447. By engaging in the conduct described above, Respondent failed to uphold the laws and regulations of the United States and was a party to their non-compliance, in violation of ¶¶ 2 and 5 of the Code of Ethics for Government Services.

448. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and did not adhere to the letter and spirit of the Rules of the House, and violated House Rule XXIII, clauses 1 and 2.

Conduct During Investigation

COUNT 27: Conduct that Reflects Discreditably Upon the House

Lack of Candor and Diligence in Ethics Investigations

449. Paragraphs 1 through 448 are incorporated by reference as if fully set forth herein.

450. The ISC recognizes that Respondent initially took a number of steps to cooperate with the Committee. Respondent produced documents in response to the ISC’s first request for information. In order to produce these documents, Respondent engaged a team of attorneys to review and produce over 2,600 documents over the course of several months. Respondent also engaged the services of a professional compliance company for her campaign committee, although this was after the investigation into Respondent was initiated by OCC and the professional compliance company did not conduct an audit, despite Respondent having knowledge of various issues with prior FEC filings.

451. Respondent also initially indicated she was available for a voluntary interview with the ISC. The day prior to the interview, Respondent informed the ISC she was no longer available. The ISC took the extraordinary step of subpoenaing Respondent for her testimony. Respondent then invoked her Fifth Amendment right against self-incrimination following receipt of a subpoena *duces tecum* to obtain documents Respondent had not provided to the

ISC and a subpoena *ad testificandum* to obtain her testimony.

452. The ISC believes that Respondent did not treat the allegations of misconduct raised by OCC's Referrals with sufficient seriousness. The delays in her responses to the ISC's first request for information and failure to respond to the ISC's second and third requests for information were inconsistent with the level of diligence Members owe to the Committee.
453. The conduct of Respondent and those acting on her behalf led to repeated delays of the ISC's investigation of the allegations involving her.
454. Respondent's lack of candor and diligence in connection with the investigations of the Committee and ISC as a whole does not reflect creditably on the House.
455. By engaging in the conduct described above, Respondent acted in a manner that does not reflect creditably on the House and violated House Rule XXIII, clause 1.

EXHIBIT 2

Message

From: Sheila Cherfilus McCormick [redacted]@hotmail.com]
on behalf of Sheila Cherfilus McCormick [redacted]@hotmail.com > [redacted]@hotmail.com]
Sent: 1/2/2021 4:04:24 PM
To: [redacted]@info@[redacted].com]; Edwin Cherfilus [redacted]@hotmail.com]; Nadege Barclay [redacted]@hotmail.com]
Subject: Sheila for Congress election

Hello [redacted]

Happy New Year!

This New Year has brought in many new developments. I will be running for Congress again and need to roll out my nonprofit Essential Health. There has been some whispering going on that there may be a special election soon approaching. So, I wanted to get a head start on the designs needed. Would we be able to work out a package deal with a payment plan? Here is the list of designs I will need for my campaign:

Sheila For Congress:

- Campaign Letter Head with my picture
- 5 Flyers:
 - Announcement flyer
 - Policy position Flyers
 - Economy
 - Health Care
 - Affordable Housing
- Road sign design
- yard sign design
- Website Update: update it and add social media on to page

(We will be keeping the same colors and designs scheme)

Essential Community Health:

- Letter Head
- Announcement flyer
 - with all of our board members pictures
 - high lighting the founders

(Colors will be the same as campaign colors)

Best wishes,

Sheila Cherfilus-McCormick

ISC016926

EXHIBIT 3

ESSENTIAL
COMMUNITY
HEALTH

BRINGING HEALTHCARE
TO THE COMMUNITY

Sheila Cherfilus-
McCormick, JD
Co- Founder

[REDACTED]
Co- Founder

[REDACTED]
Board Member

[REDACTED]
MPH
Board Member

Respondent's Sister
RN,BSN, NP
Board Member

[REDACTED]
Board Member

Nadege LeBlanc
Board Member

February 24, 2021

Re: COVID-19 Vaccination Registration

To: [REDACTED],

Essential Community Health is ready to participate in the states COVID-19 vaccination registration as soon as possible. Essential Community Health is an organization that is committed to promoting fair access to healthcare. We use a data-driven approach to identify the areas most affected by health disparities. Our affiliation with local hospital, healthcare professionals and faith leader alliance groups positions us to offer a unique COVID-19 outreach initiative that overcomes these hurdles.

Project Overview

Our present COVID-19 vaccination registration initiative employs community health canvassers to perform vaccination registration at churches, door-to-door, and heavily frequented locations. Our partnership with our parent company Trinity Health Care Services, gives us the capacity to conduct the necessary criminal background checks for individual working in the healthcare field. Trinity Health Care Services, LLC. has been in the healthcare industry since 1994, licensed by the Agency for Health Care Administration and accredited by The Joint Commission. Trinity Health Care Services is Medicare/Medicaid certified. Both entities are owned and operated by black women and seat more than 12 women of color on their board of directors.

We have access to a diverse pool of 1200- 2000 employees throughout Broward and Dade Counties. Our multilingual staff speaks English, Spanish, Creole and French. Our onboarding and training period is between 1-2 weeks. This time period is determined by the location, size of coverage area, software and types of tablets that are provided in the contract.

Scope of Work

Community health canvassers

- Facilitate background checks
- Recruit, hire and manage staff
- Train staff on portable device and registration software
- Run staff meetings and skills training
- Arrange briefings and workshops to educate on HIPPA Rules
- Evaluate staff performance and ensure registration goals are being met

Administration:

- Oversee administrative functions
- Ensure that information collected get to the partner organization
- Complete staff payroll
- Schedule staff
- Provide personal protective equipment
- Have a IT specialist onsite to maintain hardware such as tablets
- Acquire canvassing software
- Provide uniform and Identification badges

Rates:

Administrative Coordinators	\$60
LPN	\$60
Home Health Aide	\$30
Medical Canvassers	\$45
Operations Manager	\$75
Project manager	\$160
Administrative Assistant	\$45
IT Support Specialist	\$66
RN	\$140

Thank you for considering a minority owned business for this project and we appreciate your commitment to ending this pandemic. I look forward to speaking to you soon on how we can move forward. Please feel free to reach me at [REDACTED].

Sincerely,


Sheila Cherfi us-McCormick, JD
Co-Founder, Essential Community Health

[REDACTED]

Digitally signed by [REDACTED]
DN: dc=org, dc=fleoc,
ou=DEM_Users, ou=Director,
cn=[REDACTED],
email=[REDACTED]@em.myflori
da.com
Date: 2021.02.27 09:40:04 -05'00'

EXHIBIT 4



TRINITY HEALTH CARE SERVICES, LLC.

Faith, Hope and Love



Date: 3/4/2021

Re: **Addendum:** COVID-19 Vaccination Registration

To: [REDACTED]

Contract Overview

Our present COVID-19 vaccination registration initiative employs community health canvassers to perform vaccination registration at churches, door-to-door, and heavily frequented locations. Our partnership with our parent company Trinity Health Care Services, gives us the capacity to conduct the necessary criminal background checks for individual working in the healthcare field. Trinity Health Care Services, LLC. has been in the healthcare industry since 1994, licensed by the Agency for Health Care Administration and accredited by The Joint Commission. Trinity Health Care Services is Medicare/Medicaid certified. Both entities are owned and operated by black women and seat more than 12 women of color on their board of directors.

We have access to a diverse pool of 1200- 2000 employees throughout Broward and Dade Counties. Our multilingual staff speaks English, Spanish, Creole and French. Our onboarding and training period is between 1-2 weeks. This time period is determined by the location, size of coverage area, software and types of tablets that are provided in the contract.

Scope of Work

Community health canvassers

- Facilitate background checks
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- Run staff meetings and skills training
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- Evaluate staff performance and ensure registration goals are being met

Administration:

- Oversee administrative functions
- Ensure that information collected get to the partner organization
- Complete staff payroll
- Schedule staff
- Provide personal protective equipment
- Have a IT specialist onsite to maintain hardware such as tablets
- Acquire canvassing software
- Provide uniform and Identification badges

6151 Miramar Parkway, Suite 101
Miramar, Florida 33023
Phone:(954) 986-1754
Fax: (954) 986-1757

3951 N. Haverhill Rd. Ste.202-204
West Palm Beach, Florida 33417
Phone: (561) 471-7676
Fax :(561) 471-8485

ISC016922



TRINITY HEALTH CARE SERVICES, LLC.

Faith, Hope and Love



Description

Rate Per Hour

RN	\$150 - Travel Rate \$158
LPN	\$120 – Travel Rate \$128
Site Lead	\$105 – Travel Rate \$113
CNA	\$95 – Travel Rate \$103
Nurse Practitioner	\$225 – Travel Rate \$233
Project Manager	\$170 – Travel Rate \$178
Clerical	\$95 - Travel Rate \$103
Pharmacist	\$180– Travel Rate \$188
Coordinator	\$100 – Travel Rate \$108
Nurse Practitioner	

Volunteers \$80 Stipend
(Stipend for background check with no markup)

**Level II Background Check price built into pricing*

**Hourly overtime rate factor 1.5*

Thank you for considering a minority owned business for this project and we appreciate your commitment to ending this pandemic. I look forward to speaking to you soon on how we can move forward. Please feel free to reach me at [REDACTED]

Sincerely,

Sheila Cherfilus-McCormick, JD
CEO, Trinity Health Care Service, LLC

6151 Miramar Parkway, Suite 101
Miramar, Florida 33023
Phone:(954) 986-1754
Fax: (954) 986-1757

3951 N. Haverhill Rd. Ste.202-204
West Palm Beach, Florida 33417
Phone: (561) 471-7676
Fax :(561) 471-8485

ISC016923



TRINITY HEALTH CARE SERVICES, LLC.

Faith, Hope and Love



6151 Miramar Parkway, Suite 101
Miramar, Florida 33023
Phone:(954) 986-1754
Fax: (954) 986-1757

3951 N. Haverhill Rd. Ste.202-204
West Palm Beach, Florida 33417
Phone: (561) 471-7676
Fax :(561) 471-8485

ISC016924

EXHIBIT 5

Form **8879-S**

IRS e-file Signature Authorization for Form 1120-S

OMB No. 1545-0123

- ▶ ERO must obtain and retain completed Form 8879-S.
- ▶ Go to www.irs.gov/Form8879S for the latest information.

2021

Department of the Treasury
Internal Revenue Service

For calendar year 2021, or tax year beginning

2021, and ending

2021

Name of corporation

TRINITY HEALTHCARE SERVICES, LLC

Employer identification number

65-0501908

Part I Tax Return Information (Whole dollars only)

1	Gross receipts or sales less returns and allowances (Form 1120-S, line 1c)	1	19,782,803
2	Gross profit (Form 1120-S, line 3)	2	19,782,803
3	Ordinary business income (loss) (Form 1120-S, line 21)	3	2,933,807
4	Net rental real estate income (loss) (Form 1120-S, Schedule K, line 2)	4	
5	Income (loss) reconciliation (Form 1120-S, Schedule K, line 18)	5	2,933,807

Part II Declaration and Signature Authorization of Officer (Be sure to get a copy of the corporation's return)

Under penalties of perjury, I declare that I am an officer of the above corporation and that I have examined a copy of the corporation's 2021 electronic income tax return and accompanying schedules and statements and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that the amounts in Part I above are the amounts shown on the copy of the corporation's electronic income tax return. I consent to allow my electronic return originator (ERO), transmitter, or intermediate service provider to send the corporation's return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the corporation's federal taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-8537 no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I have selected a personal identification number (PIN) as my signature for the corporation's electronic income tax return and, if applicable, the corporation's consent to electronic funds withdrawal.

Officer's PIN: check one box only

I authorize [redacted] to enter my PIN [redacted] as my signature on the corporation's 2021 electronically filed income tax return.

As an officer of the corporation, I will enter my PIN as my signature on the corporation's 2021 electronically filed income tax return.

Officer's signature ▶ *[Signature]* Date ▶ 10/18/2022 Title ▶ PRESIDENT

Part III Certification and Authentication

ERO's EFIN/PIN. Enter your six-digit EFIN followed by your five-digit self-selected PIN.

[redacted] Don't enter all zeros

I certify that the above numeric entry is my PIN, which is my signature on the 2021 electronically filed income tax return for the corporation indicated above. I confirm that I am submitting this return in accordance with the requirements of Pub. 3112, IRS e-file Application and Participation, and Pub. 4163, Modernized e-File (MeF) Information for Authorized IRS e-file Providers for Business Returns.

ERO's signature ▶ [redacted] Date ▶ 9/14/2022

ERO Must Retain This Form - See Instructions
Don't Submit This Form to the IRS Unless Requested To Do So

For Paperwork Reduction Act Notice, see instructions.

Form **8879-S** (2021)

JSA

1031012 000

5960LR 143W

65-0501908

ISC016925

EXHIBIT 6

Number of participants	3
Participants	Respondent [REDACTED] [REDACTED]
Number of messages	26
First message sent date/time	June 28, 2021 7:04:03 AM
Last message sent date/time	June 28, 2021 8:08:19 AM

Respondent [REDACTED] **June 28, 2021 7:04:03 AM**

Good morning [REDACTED] would you be able to donate to the campaign today or tomorrow?

[REDACTED] **June 28, 2021 7:04:30 AM**

Yes. In what format?

Respondent [REDACTED] **June 28, 2021 7:05:10 AM**

Respondent's Sister [REDACTED] is leaving today so she can bring checks if not than online.

Respondent [REDACTED] **June 28, 2021 7:05:23 AM**

My deadline is the 30th

Respondent [REDACTED] **June 28, 2021 7:05:44 AM**

Also need to send gifts to investors

██████████ June 28, 2021 7:06:14 AM

Send the link. I didn't know we had a deadline. I can drop some checks with ██████████ and ██████████ today and do the rest online.

██████████ June 28, 2021 7:06:18 AM

Is that ok?

Respondent ██████████

June 28, 2021 7:06:56 AM

Yes, it's the deadline for my first quarter showing

Respondent ██████████

June 28, 2021 7:07:07 AM

That would be perfect

Respondent ██████████

June 28, 2021 7:07:37 AM

Thank you

Respondent ██████████

June 28, 2021 7:07:54 AM

I will call you on my way to the gym

██████████ June 28, 2021 7:09:12 AM

I'm driving to Miami with ██████████. I have to pick out the cabinets and then come back before tennis at 4pm.

██████████ June 28, 2021 7:09:51 AM

I have a couple checks in my wallet. I can go online and send from my business

Respondent ██████████

June 28, 2021 7:10:10 AM

I can't take business checks

Respondent ██████████

June 28, 2021 7:10:20 AM

Has to be all personal

██████████ ██████████ June 28, 2021 7:10:27 AM

Perfect. I have personal checks with me

██████████ ██████████ June 28, 2021 7:10:58 AM

I have to return a basket to your mom so I'll drop the check and the basket



June 28, 2021 7:11:48 AM

A large, white, stylized logo consisting of the letters 'A' and 'B' in a bold, sans-serif font. The 'A' and 'B' are positioned side-by-side, with the 'A' slightly overlapping the 'B'. The logo is centered within a blue rectangular area.

A23CA529-E302-4C1A-A51B-B1C26C633E13.pluginPayloadAttachment

June 28, 2021 7:11:48 AM

SHEILA CHERFILUS McCORMICK



U. S Representative | Florida District 20

66A47CC2-BF24-4272-BF6F-E4E642831672.pluginPayloadAttachment

June 28, 2021 7:11:48 AM

<https://secure.actblue.com/donate/sheilaforcongress>

Respondent

June 28, 2021 7:11:56 AM

The max is 2 checks of 2900. That is why ^{Respondent's Sister} had to give money to Nadege for her to make another donation

Respondent

June 28, 2021 7:12:01 AM

Liked "I have to return a basket to your mom so I'll drop the check and the basket "

[REDACTED] June 28, 2021 7:12:03 AM

I'm going to use this to send out. Is that good?

Respondent [REDACTED]

June 28, 2021 7:12:32 AM

Yes thank you so much 😊

[REDACTED] June 28, 2021 8:03:27 AM

Can you check to see if donations came thru. I have some that should have gone thru this morning but one person said the money didn't come out of their account yet

Respondent [REDACTED]

June 28, 2021 8:08:19 AM

Yes, I received them! Thank you so much 😊

EXHIBIT 7

Number of participants	3
Participants	[REDACTED] [REDACTED] Respondent
Number of messages	14
First message sent date/time	June 11, 2021 11:20:52 AM
Last message sent date/time	June 11, 2021 10:19:19 PM

[REDACTED] **June 11, 2021 11:20:52 AM**
How are you doing today?

[REDACTED] **June 11, 2021 11:22:39 AM**
A friendly reminder that we are all proud of you committing yourself to this effort. Smart, persistent work wins!

Respondent [REDACTED] **June 11, 2021 12:40:02 PM**
Hey Hector, thank you so much

Respondent [REDACTED] **June 11, 2021 12:40:16 PM**
Thank you for all your dedication

[REDACTED] **June 11, 2021 10:11:39 PM**
We're getting in the groove of communications. Now comes fundraising. I think \$100K by end of month is a reasonable goal.

[REDACTED] June 11, 2021 10:13:55 PM

As for how much to loan, I think as much as you're comfortable with. One thing is for sure, The roll out expenses will demonstrate your financial commitment.

Respondent [REDACTED]

June 11, 2021 10:14:58 PM

Goal is 2 million at least 1.5

[REDACTED] June 11, 2021 10:15:04 PM

I'm switching you to a new program that combines call time, fundraising planning and compliance together. That way we can work remotely and stay organized.

Respondent [REDACTED]

June 11, 2021 10:15:20 PM

Liked "I'm switching you to a new program that combines call time, fundraising planning and compliance together. That way we can work remotely and stay organized."

[REDACTED] June 11, 2021 10:17:43 PM

I suggest you move funds in to the campaign account sooner rather than waiting towards the end of the month. This is the one chance to post a big number.

Respondent [REDACTED]

June 11, 2021 10:18:47 PM

I am not planning on using that amount just leveraging

Respondent

June 11, 2021 10:19:04 PM

I think that is a good idea

June 11, 2021 10:19:13 PM

Indeed. But nobody has to know that.

Respondent

June 11, 2021 10:19:19 PM

Yes

EXHIBIT 8

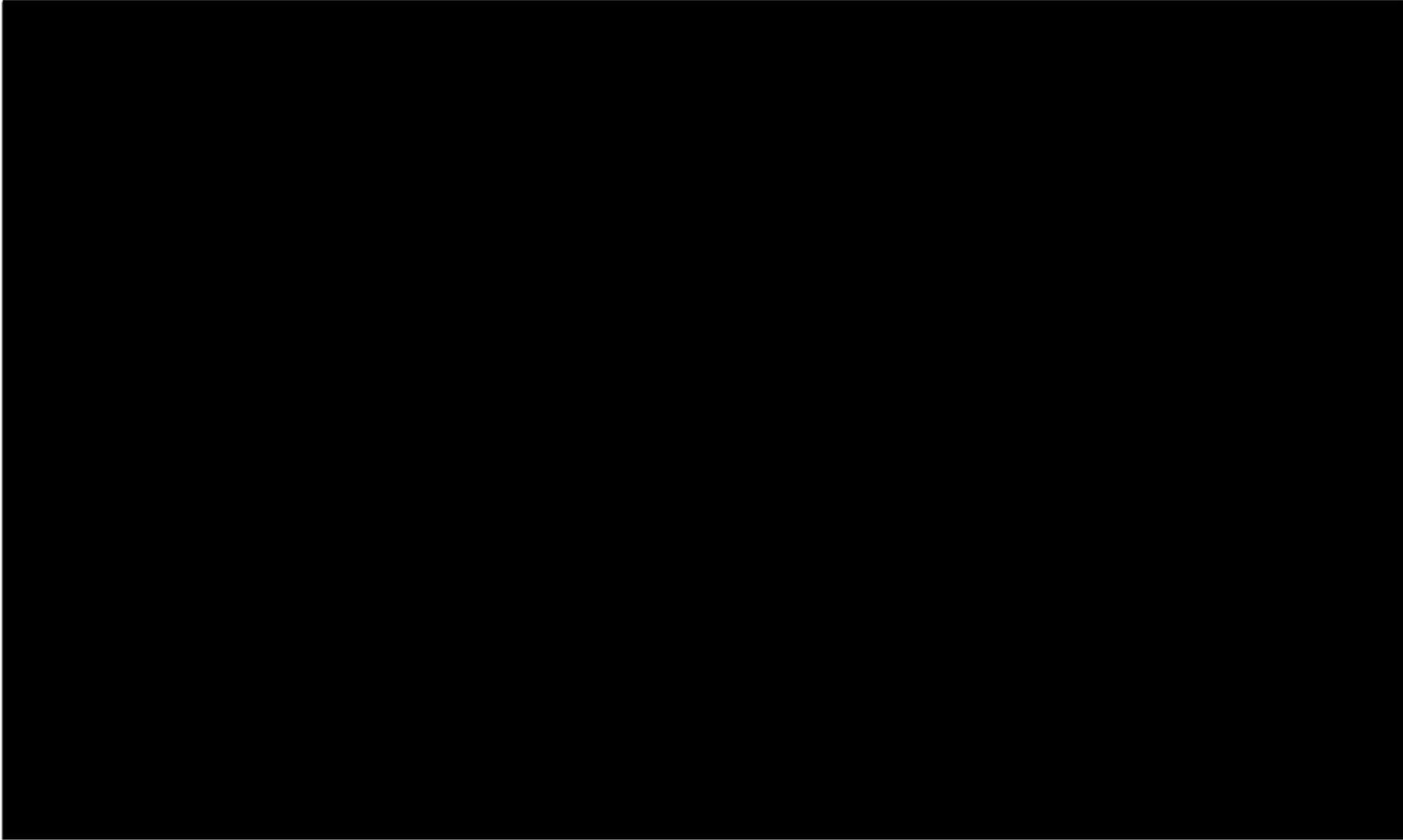
Short Message Report

Conversations: 1	Participants: 3
Total Messages: 124	Date Range: 4/1/2022 - 4/30/2022

Outline of Conversations

 + [REDACTED] • 124 messages between 4/1/2022 - 4/30/2022 • Individual 1 < [REDACTED] > • Nadu
CELL < [REDACTED] > • UNSPECIFIED_PARTICIPANT

Messages in chronological order (times are shown in GMT -04:00)



NC

Nadu CELL



4/1/2022, 9:38 AM

9:38

ActBlue

**Re-Elect Congresswoman
Sheila Cherfilus-
McCormick - Page
Statistics**

Want some tips? Check out our refcode tutorial.

- Toggle refcode chart
- Toggle refcode table

Search for a refcode...

Cards Rows

Mobile	Total (avg.)	Recur #	Recur
75.0%	\$10,005.00 (\$233.28)	0 (0.0%)	\$0.00 (0.0%)
75%	\$10,666.00	0	\$0.00

- Contribution summary by recipient
- Additional tools



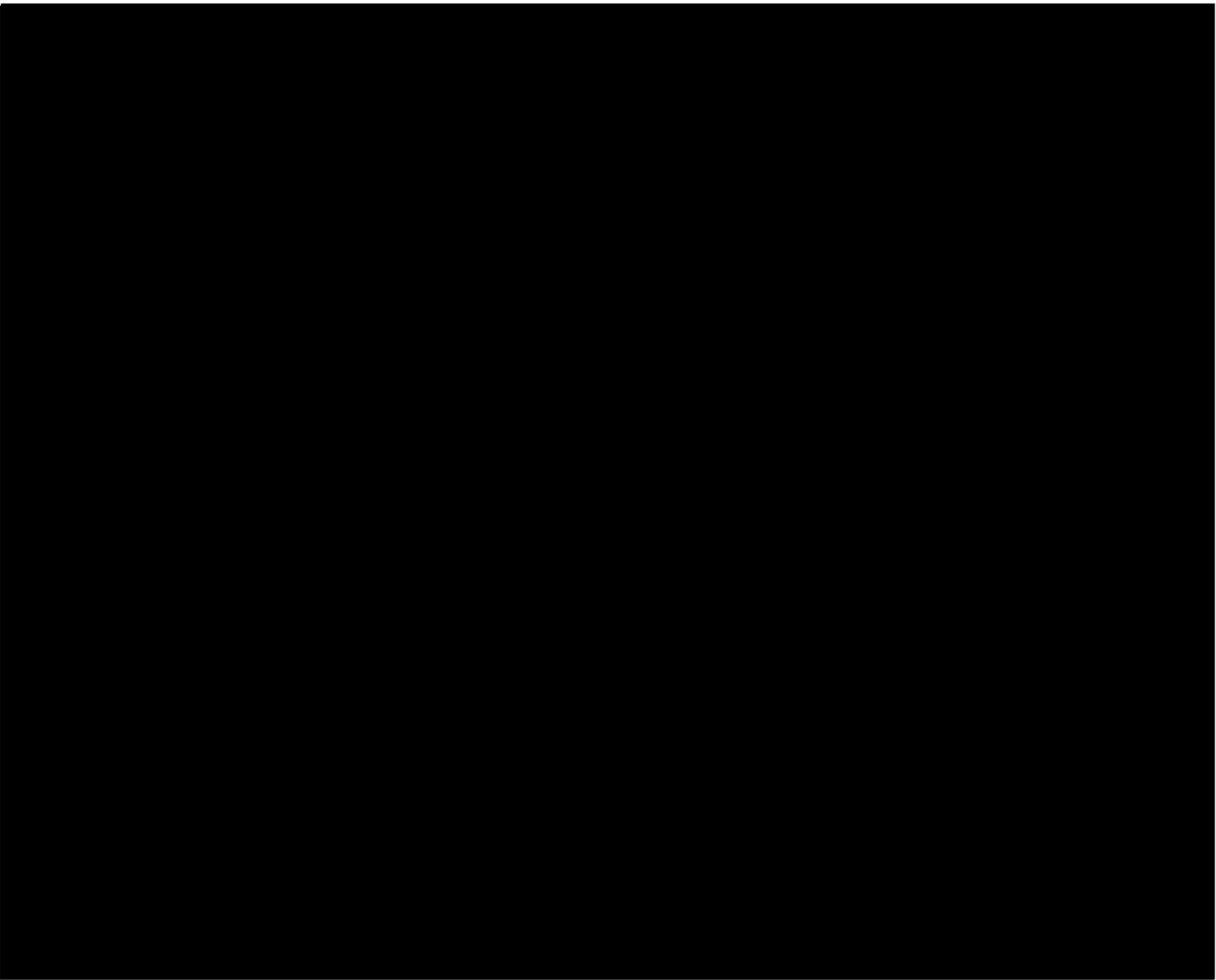
secure.actblue.com

Image: ~_Library_SMS_Attachments_dc_12_59A49168-60EF-445F-BC57-C0CAD1C9703B_IMG_9062.PNG (448 KB)



ISC016705





NC Nadu CELL [REDACTED] 4/1/2022, 9:41 AM
I want to know how much Dale raised

[REDACTED] Individual 1 [REDACTED] 4/1/2022, 9:42 AM
You will know on April 15

[REDACTED] Individual 1 [REDACTED] 4/1/2022, 9:44 AM
But not to be a downer he will have hundreds of thousands including carry over from last report and we have about 20k cash on hand

NC Nadu CELL [REDACTED] 4/1/2022, 9:47 AM
How will he have hundreds of thousands he was negative at the end of last campaign

[REDACTED] Individual 1 [REDACTED] 4/1/2022, 9:49 AM
Dale Holness has six figures for CD 20 rematch
<https://floridapolitics.com/archives/495343-dale-holness-has-six-figures-for-cd-20-rematch/>

NC Nadu CELL [REDACTED] 4/1/2022, 9:51 AM
So April 15 everyone will see he has more money than us

ISC016706



[REDACTED]

Individual 1 [REDACTED]

4/1/2022, 9:54 AM

No we are reporting more than a million dollars (long story not getting into it by text)

NC

Nadu CELL [REDACTED]

4/1/2022, 9:55 AM

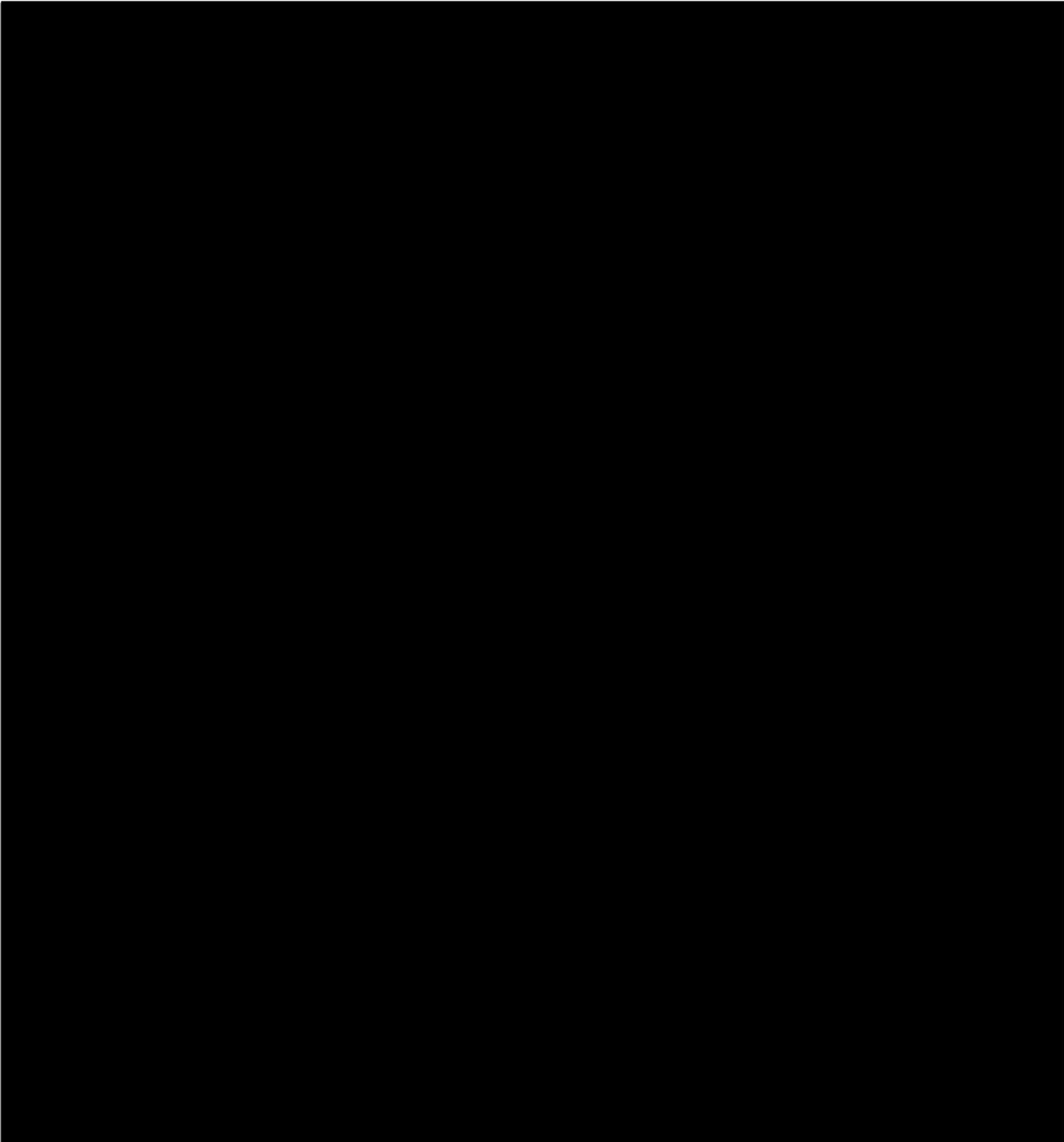
Ok

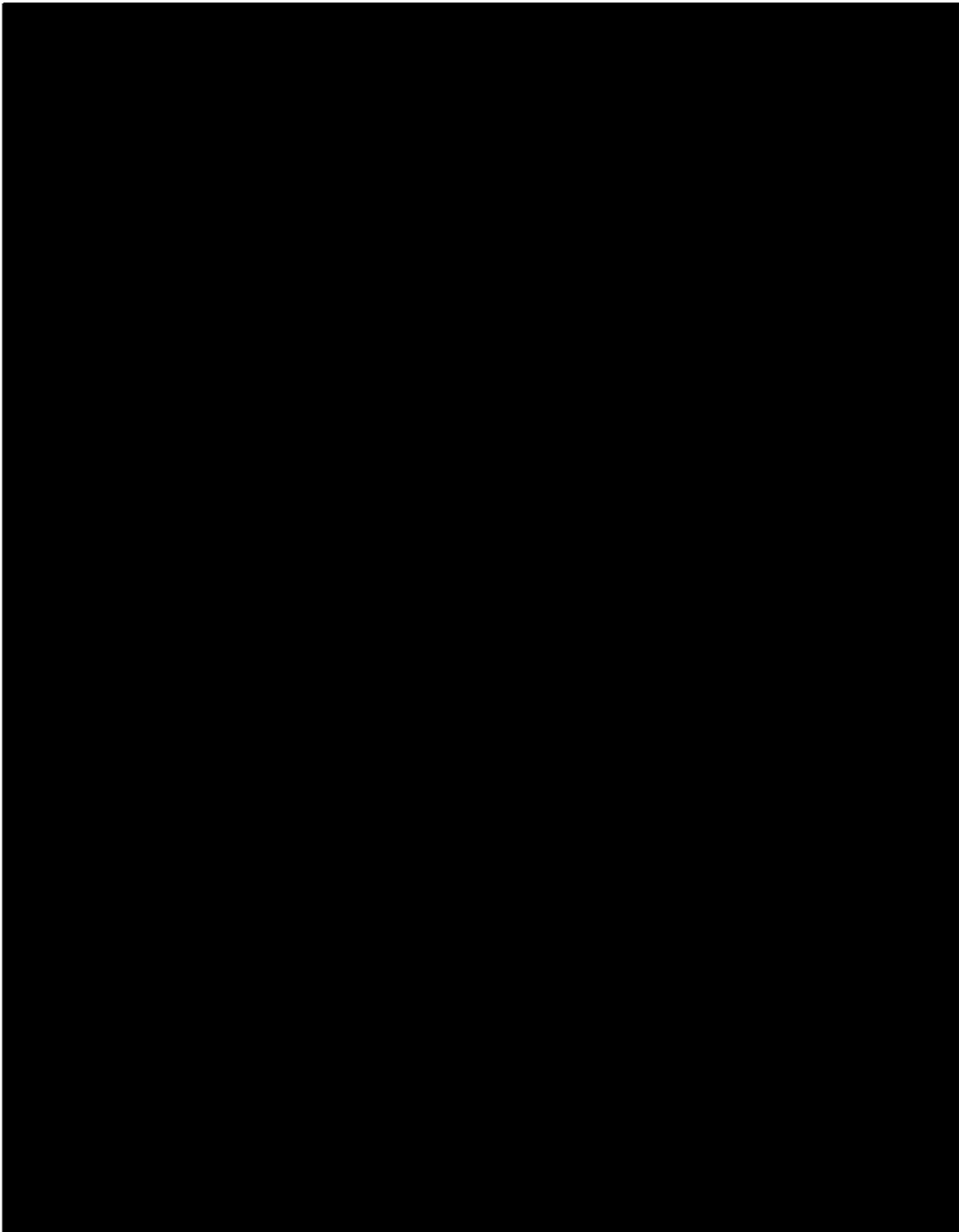
NC

Nadu CELL [REDACTED]

4/1/2022, 9:55 AM

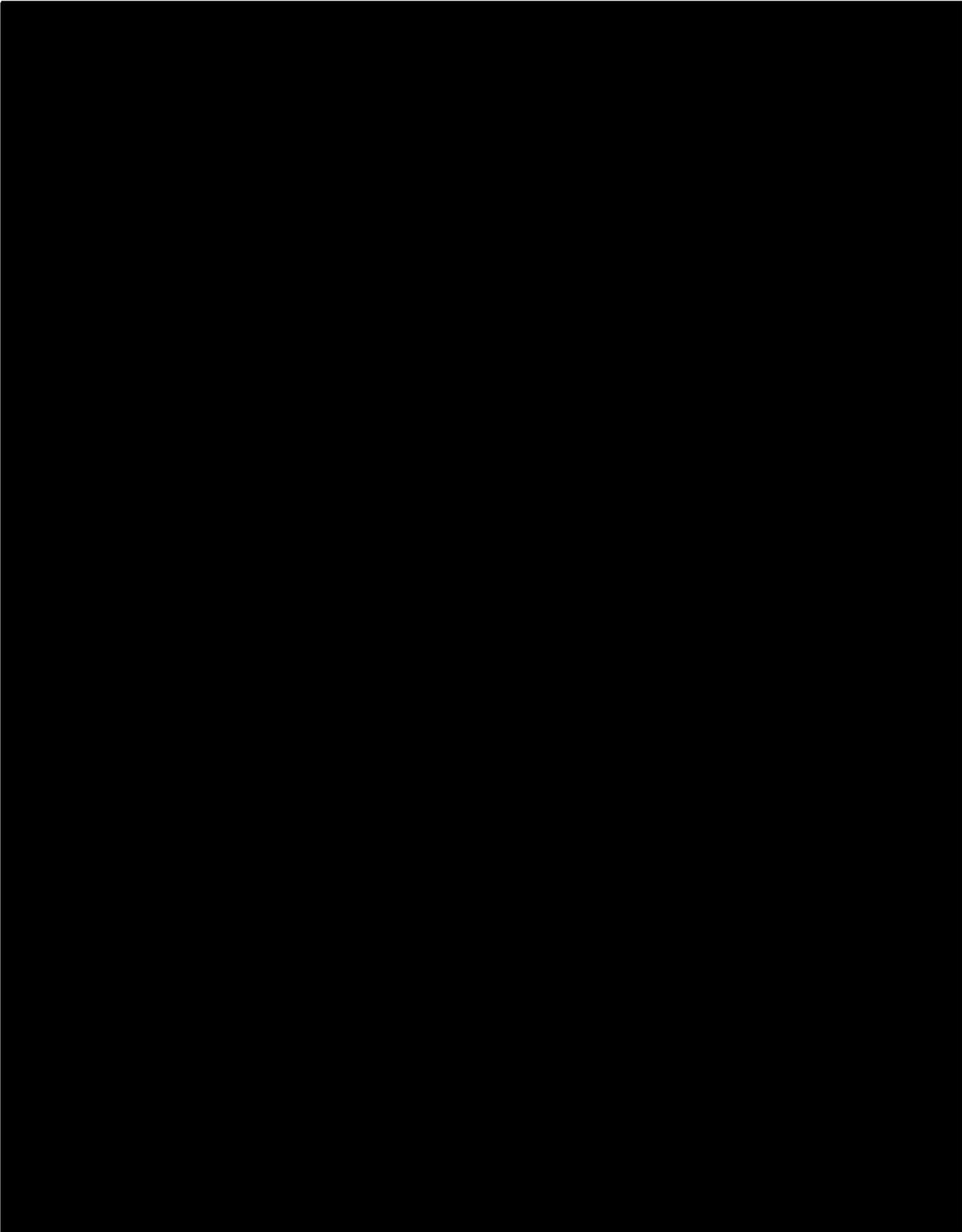
Good

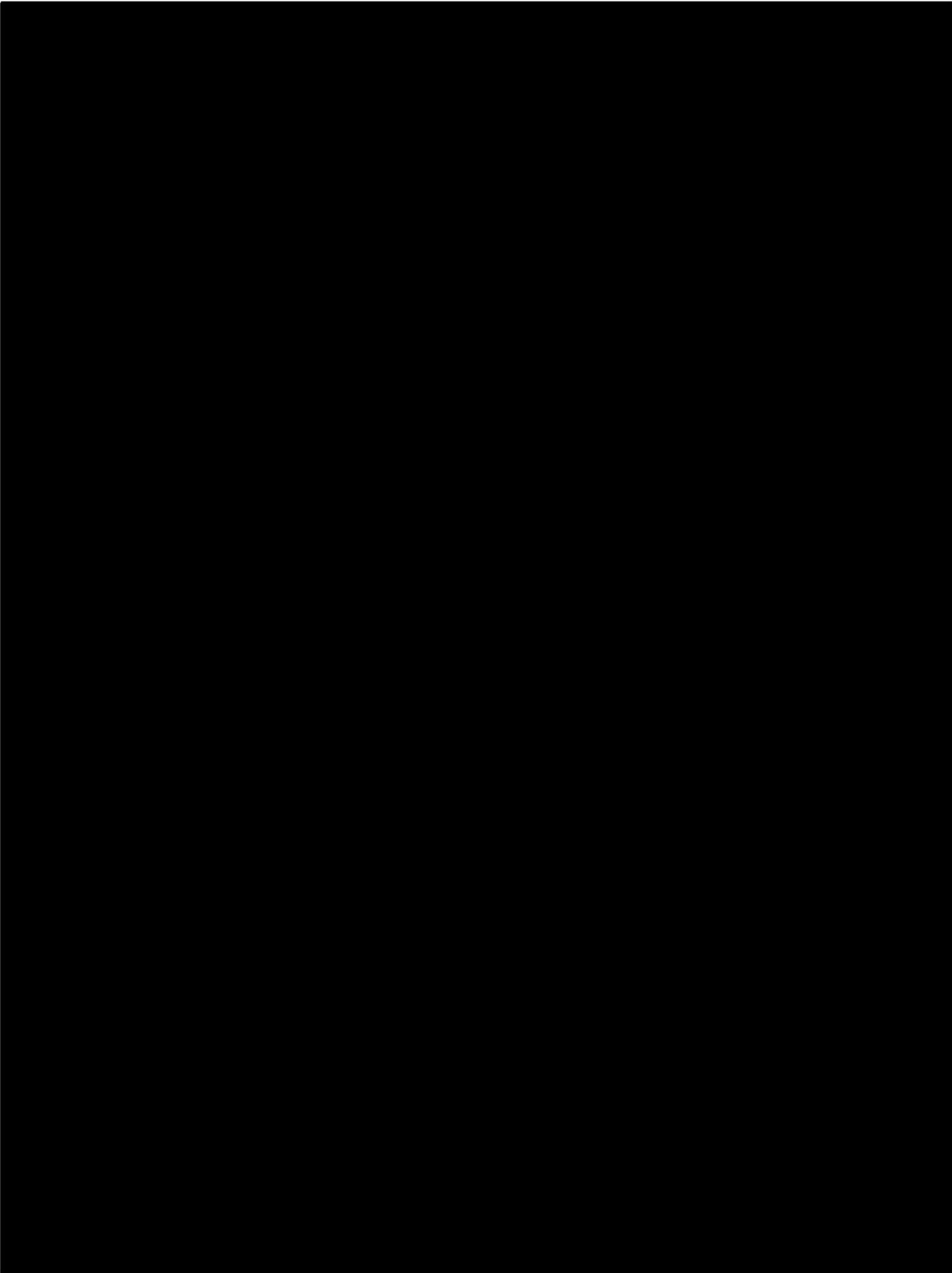


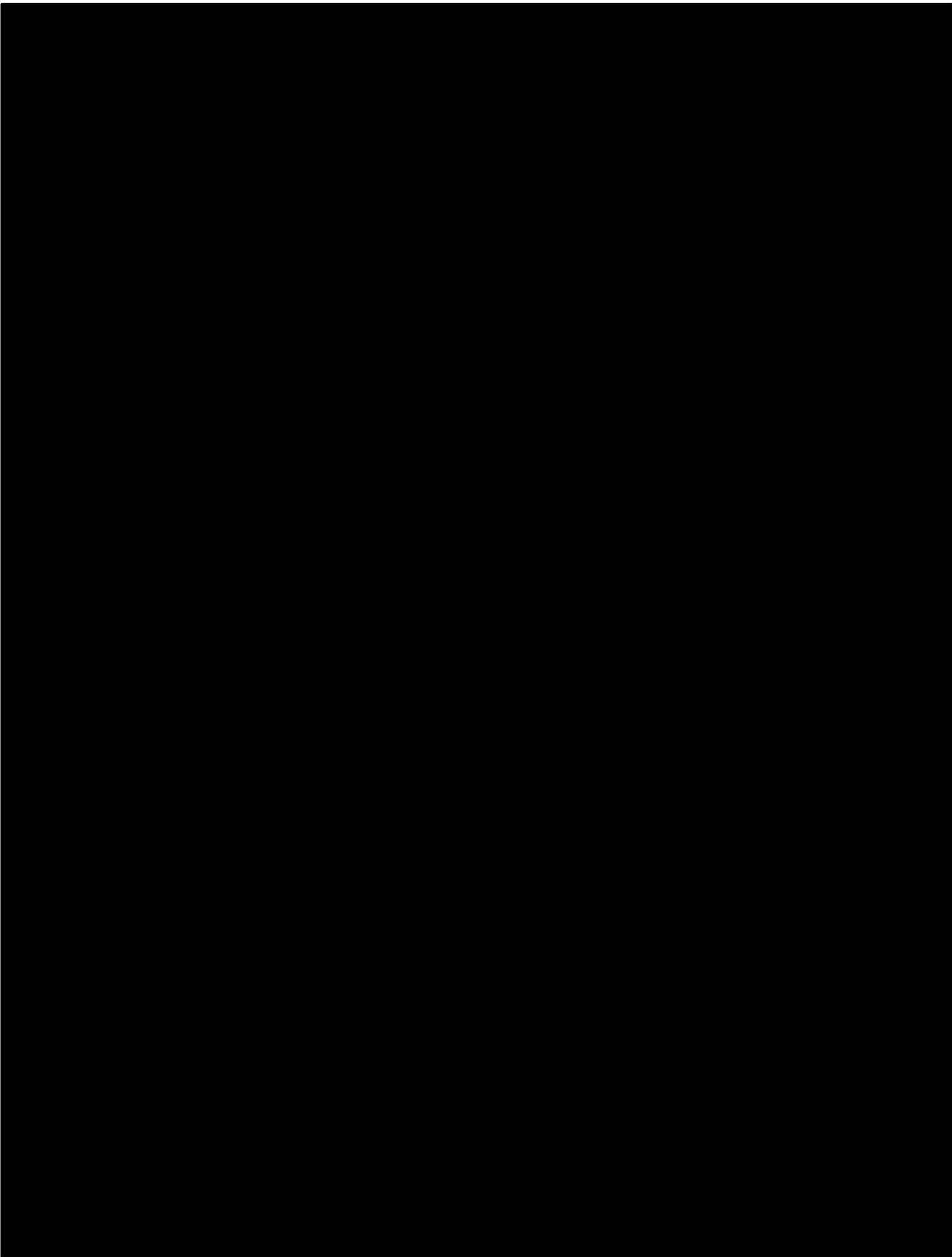


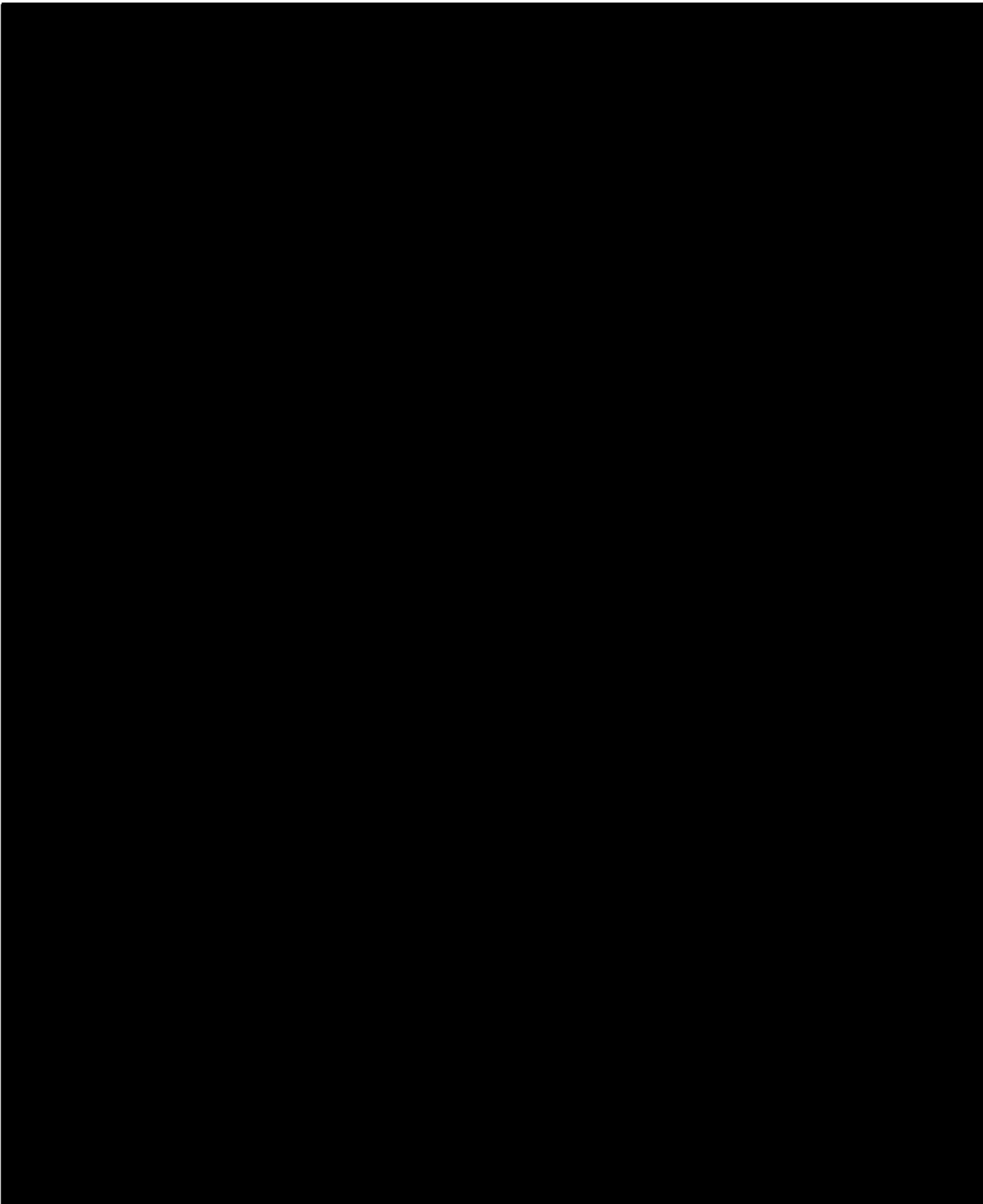
ISC016708





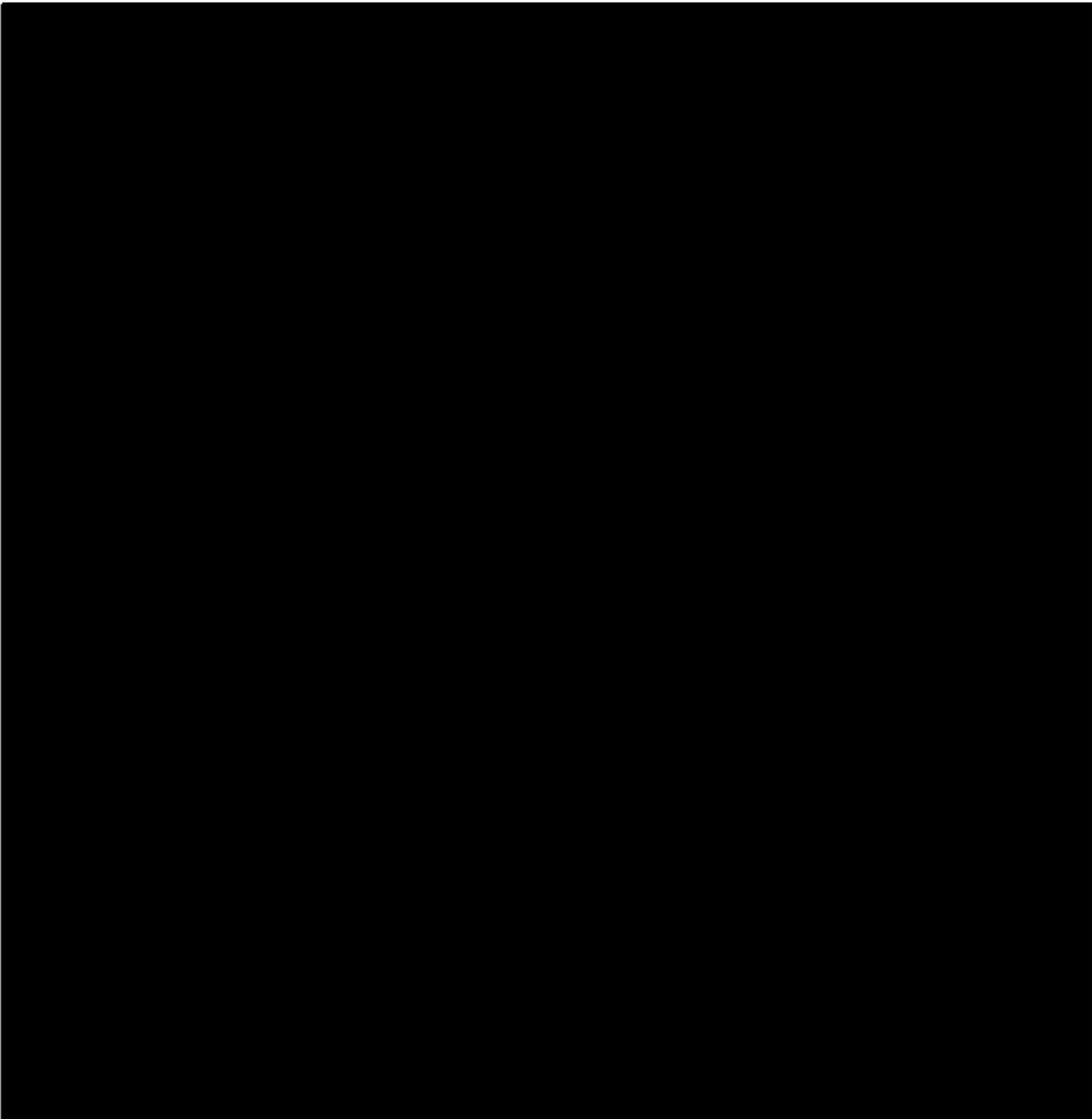






ISC016712





NC

Nadu CELL [REDACTED]
What is this event for tomorrow Mike said it's not his

4/24/2022, 8:55 PM

ISC016713





Image: ~ Library_SMS_Attachments_4a_10_51F19701-3215-4116-BC06-425D932C70F5_Screenshot 2022-04-24 at 8:54:52 PM.png (156 KB)

[redacted] **Individual 1** [redacted] 4/24/2022, 8:58 PM
Yes it's the people he wants sheila to meet before lunch I just called it a meet in greet...I went over the whole days schedule with Sheila earlier...Mike needs to give you a meeting place...which I thought was happening the other day....unless he is canceling the meeting and he didn't tell me...which I'm okay with

NC **Nadu CELL** [redacted] 4/24/2022, 9:02 PM
I asked him about it and he said these are his only events for tomorrow:

Monday 25th

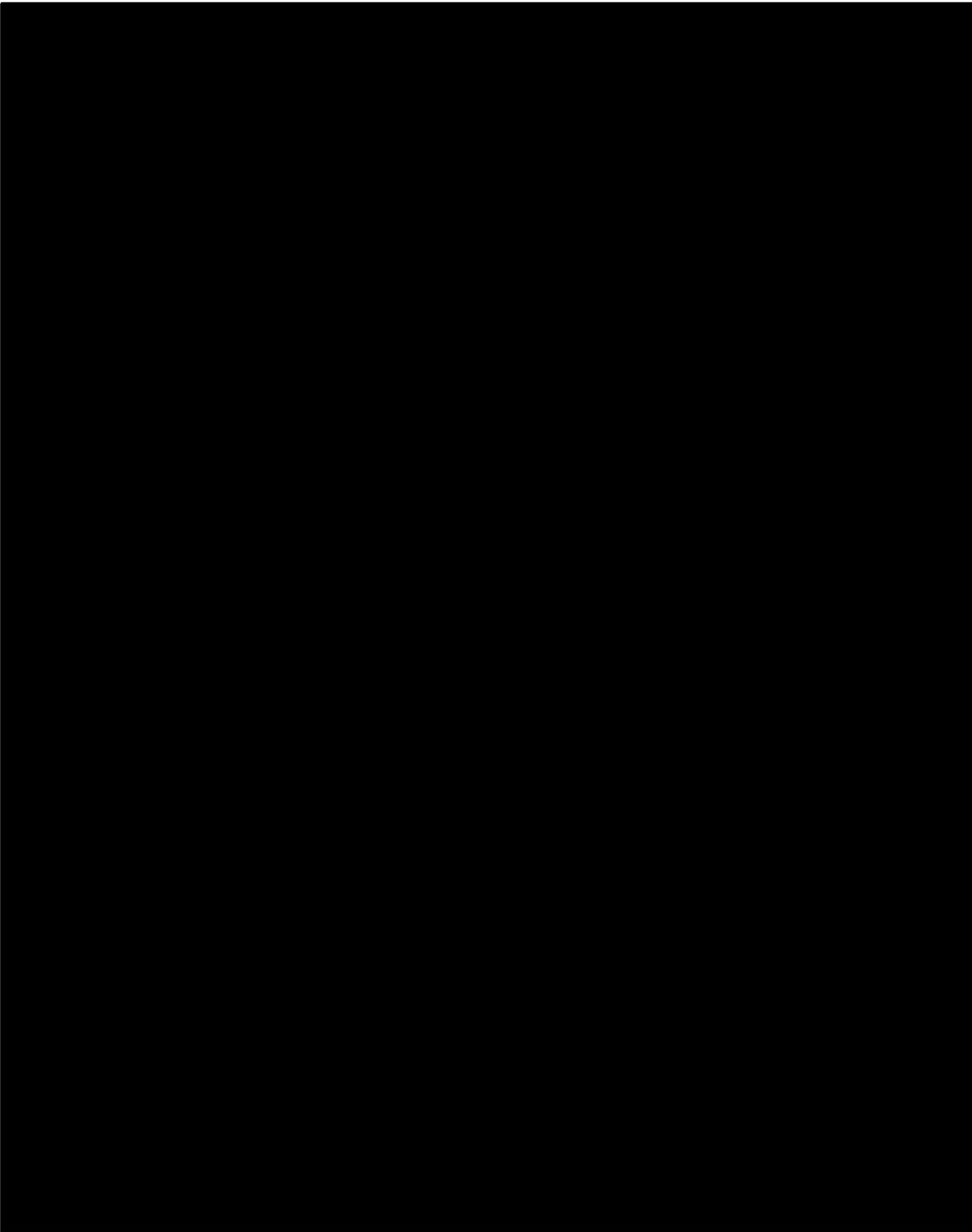
12:00pm
Petro Reception is being held by [redacted] and [redacted] her husband.
Sea Grill Restaurant
3913 NE 163rd St, North Miami Beach, FL 33160

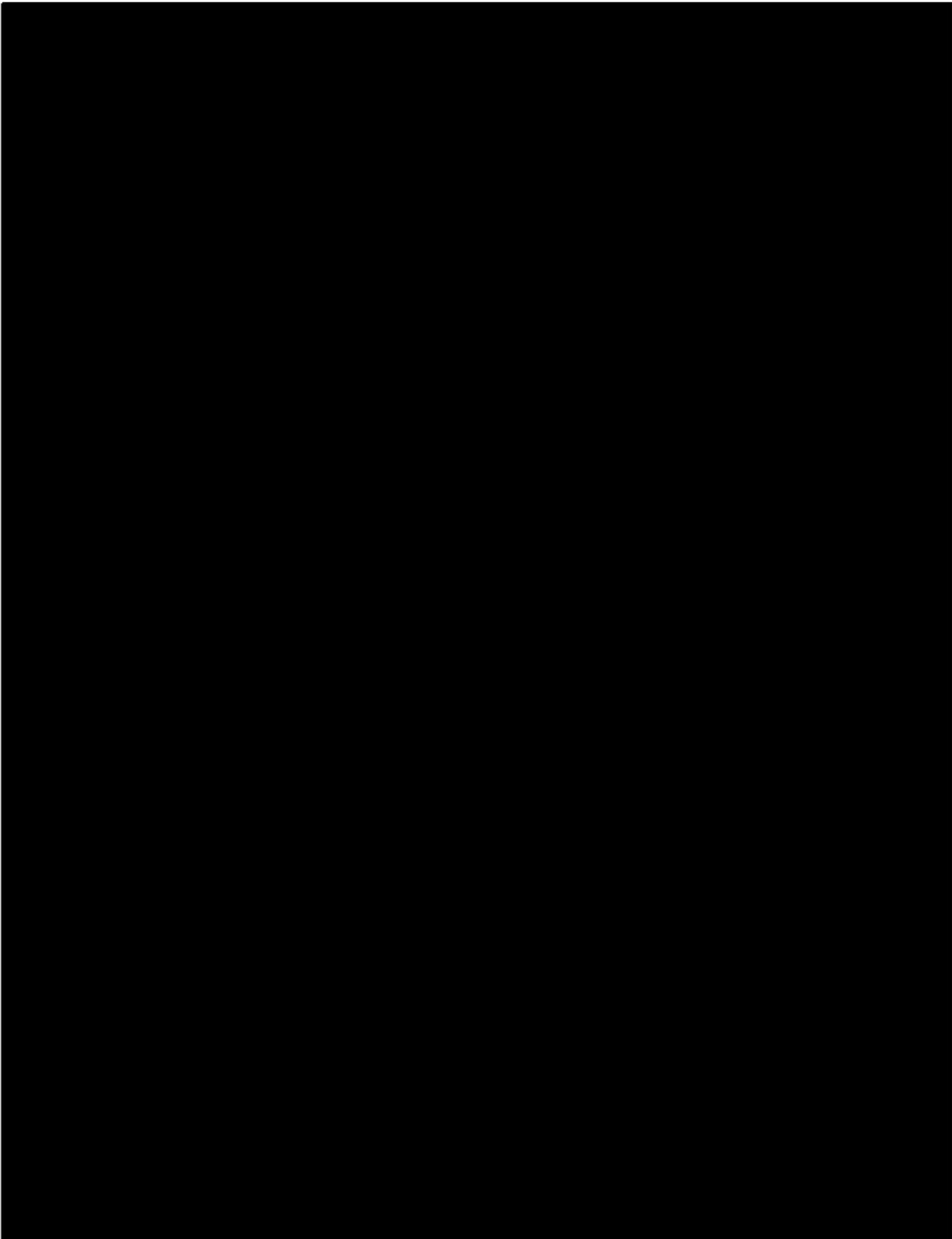
5:30pm
Holland and Knight Reception
701 Brickell Ave
UNIT 3300,
Miami, FL 33131
[4/22, 8:12 PM] Michael: Petro Gas

[redacted] **Individual 1** [redacted] 4/24/2022, 9:11 PM
Okay sounds good to me.. [redacted]

[redacted]

[redacted]





ISC016716





EXHIBIT 9

From: Hector Chris Roos Chavez
Sent: Friday, March 27, 2020 2:46 PM EDT
To: Sheila Cherfilus
Subject: FEC Rules and Notes on Personal Campaign Loans

As a disclaimer, I am not attempting to give you legal advice. Rather, I am pointing out the rules as they are expressed on FEC.gov, the Federal Elections Commission website. This will only cover the explicit rules authorizing personal campaign loans and the requirements of the May 15 financial disclosure (the FD is governed by House rules, not the FEC). I suggest you file for a 90-day extension for the FD filing before the May 15 deadline.

The FEC rules below indicate that the funds you regularly receive from anyone (in a pattern or custom established before the election cycle), funds from a bank account or from an asset you share ownership or control (a rule of thumb is that the asset in your control or you had ownership to *prior to your candidacy* and funds or assets *given to you from an estate as in probate or will* regardless of when) are considered personal funds for the purpose of giving the campaign a personal loan.

Personal Loans from the Candidate

Source: <https://www.fec.gov/help-candidates-and-committees/handling-loans-debts-and-advances/personal-loans-candidate/>

Candidates may loan their [personal funds](#) for campaign purposes. When they do so, they are making contributions to their campaigns. Unlike other contributions, these candidate contributions are not subject to any limits but are subject to additional reporting. Moreover, timing restrictions apply to the repayment of personal loans aggregating more than \$250,000 for an election.

Using the personal funds of the candidate

Source: <https://www.fec.gov/help-candidates-and-committees/candidate-taking-receipts/using-personal-funds-candidate/>

When candidates use their personal funds for campaign purposes, they are making contributions to their campaigns. Unlike other contributions, these candidate contributions are not subject to any limits. They must, however, be reported.

Definition of a candidate's "personal funds"

The personal funds of a candidate include:

- Assets which the candidate has a legal right of access to or control over, and which he or she has legal title to or an equitable interest in, at the time of candidacy;
- Income from employment;

- Dividends and interest from, and proceeds from sale or liquidation of, stocks and other investments;
- Income from trusts, if established before the election cycle;
- Income from trusts established by bequests (even after candidacy);
- Bequests to the candidate;
- Personal gifts that had been customarily received by the candidate prior to the beginning of the election cycle; and
- Proceeds from lotteries and similar games of chance.

Assets jointly held with spouse

A candidate may also use, as personal funds, his or her portion of assets owned jointly with a spouse (for example, a checking account or jointly owned stock). If the candidate's financial interest in an asset is not specified, then the candidate's share is deemed to be half the value.

Personal loans

If the candidate makes loans to the campaign (including advances or candidate-endorsed bank loans) that aggregate more than \$250,000, special rules apply.

Reporting contributions from candidate's personal funds

Contributions made from the candidate's personal funds must be reported. The reporting varies according to whether the personal funds of the candidate were loaned or contributed directly to the candidate's authorized committee, or whether the funds were spent by the candidate out-of-pocket.

How to Report Candidate Contributions

Source: <https://www.fec.gov/help-candidates-and-committees/filing-reports/candidate-contributions/>

When candidates use their personal funds for campaign purposes, they are making contributions to their campaigns. Unlike other contributions, candidate contributions are not subject to any limits. They must, however, be reported.

Note: Receipts that are intended as contributions (rather than loans) from the candidate may not later be converted into loans. Receipts intended as loans are disclosed on Line 13(a) or 13(b) of Form 3.

Reporting on candidate forms

House and Senate committees report contributions received from the candidate on Form 3, Line 11(d). A contribution from the candidate is itemized on Schedule A, supporting Line 11(d), when it:

- Exceeds \$200 or
- Aggregates over \$200 when added to other contributions received from the candidate during the election cycle.

To itemize a candidate contribution, the committee discloses:

- The candidate's name
- Mailing address
- Employer
- Occupation
- Election to which a contribution was designated (indicated by checking "primary," "general," or "other" in the election designation box)
- Date of receipt
- Amount of receipt
- Aggregate election-cycle-to-date total of all receipts from the candidate

Personal Financial Disclosure

http://clerk.house.gov/public_disc/financial.aspx

Individuals are required to file an FD Statement once they "qualify" as a candidate by raising or spending more than \$5,000 in a campaign for election to the House of Representatives. The disclosure period is from January 1 of the preceding calendar year through the date of filing.

You must file an FD Statement within 30 days of becoming a candidate or May 15 of that year, whichever ever is later.

You can also ask for an extension on the filing date (and you can receive an extension up to 90 days). *Which I suggest you do. Once granted, I believe you will be responsible for a separate, second FD statement beyond May 15 as well.*

Both the FD and extension requests can be submitted electronically via <https://fd.house.gov>.

Financial Disclosure Form B [\[Form\]](#)

Financial Disclosure Extension for Candidates [\[Form\]](#)

The campaign should have received a package from the House Ethics Committee (<https://ethics.house.gov/>) with detailed instructions, including log in information for the financial disclosure website.

Hector Christopher Roos Chavez
Sheila Cherfulis-McCormick for Congress (FL-20)
www.SheilaforCongress.com
Direct: [REDACTED]

EXHIBIT 10

Number of participants	3
Participants	[REDACTED] [REDACTED] [REDACTED]
Number of messages	6
First message sent date/time	October 27, 2021 3:51:00 PM
Last message sent date/time	October 27, 2021 9:53:14 PM



██████████ **October 27, 2021 7:00:24 PM**

Thank you ██████ sorry for the delay it's all hands on deck please send us the check made out to; Truth and Justice Inc

Mail it to:

6151 Miramar Parkway, Suite 101, Miramar, Florida 33023

Attention: Edwin

██████████ **October 27, 2021 9:00:11 PM**

Do you mean the \$ 2000 check?

██████████ **October 27, 2021 9:53:13 PM**

█████ that is what your ask for the address and the info for the union check

██████████ **October 27, 2021 9:53:14 PM**

What about "Sheila for Congress" ?

The contribution is for her campaign!

EXHIBIT 11

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 50	Date Range: 1/18/2022 - 1/28/2022

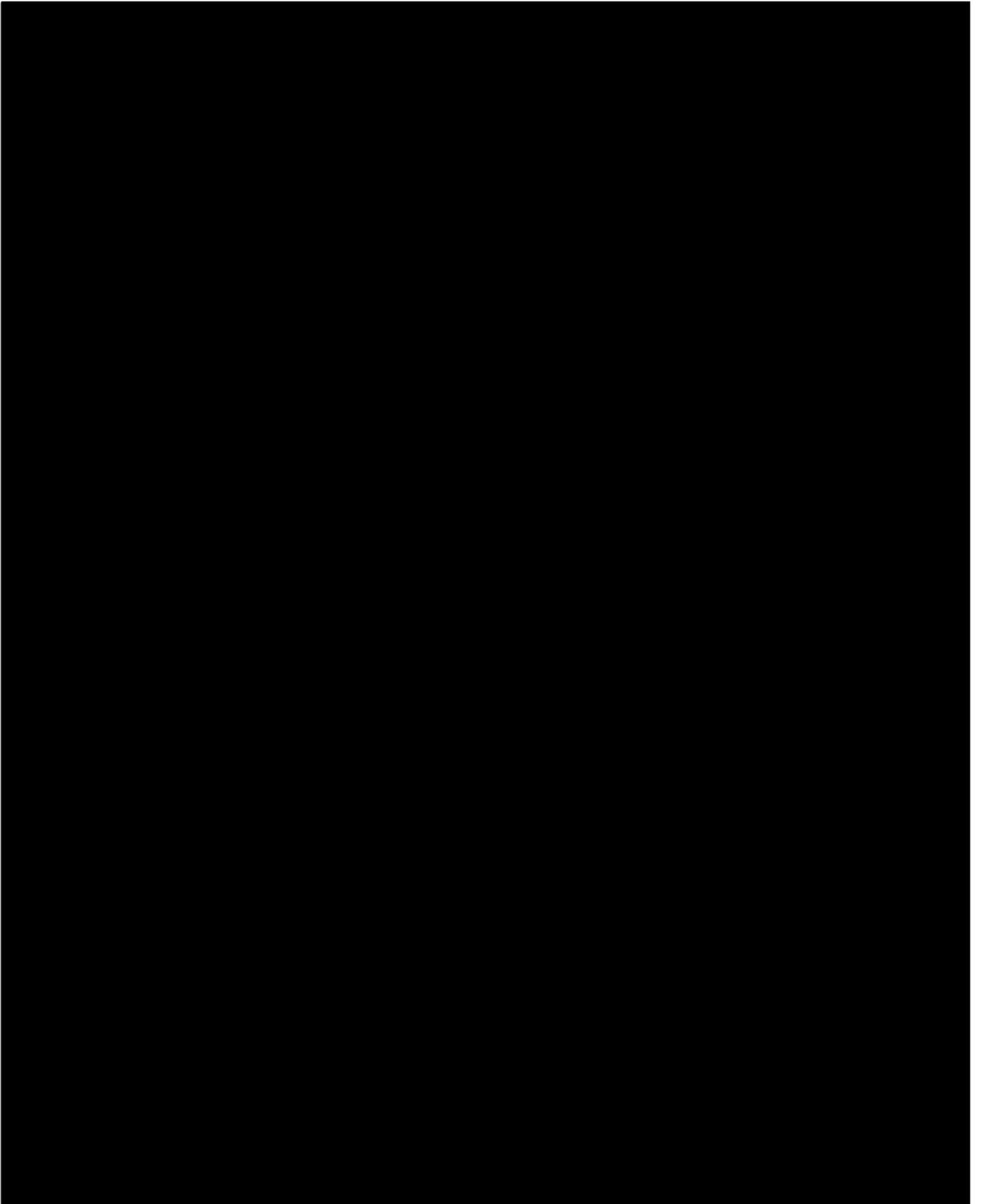
Outline of Conversations

 [REDACTED] • 50 messages between 1/18/2022 - 1/28/2022 • **Individual 1** [REDACTED] • Nadu
CELL [REDACTED]

EXHIBIT

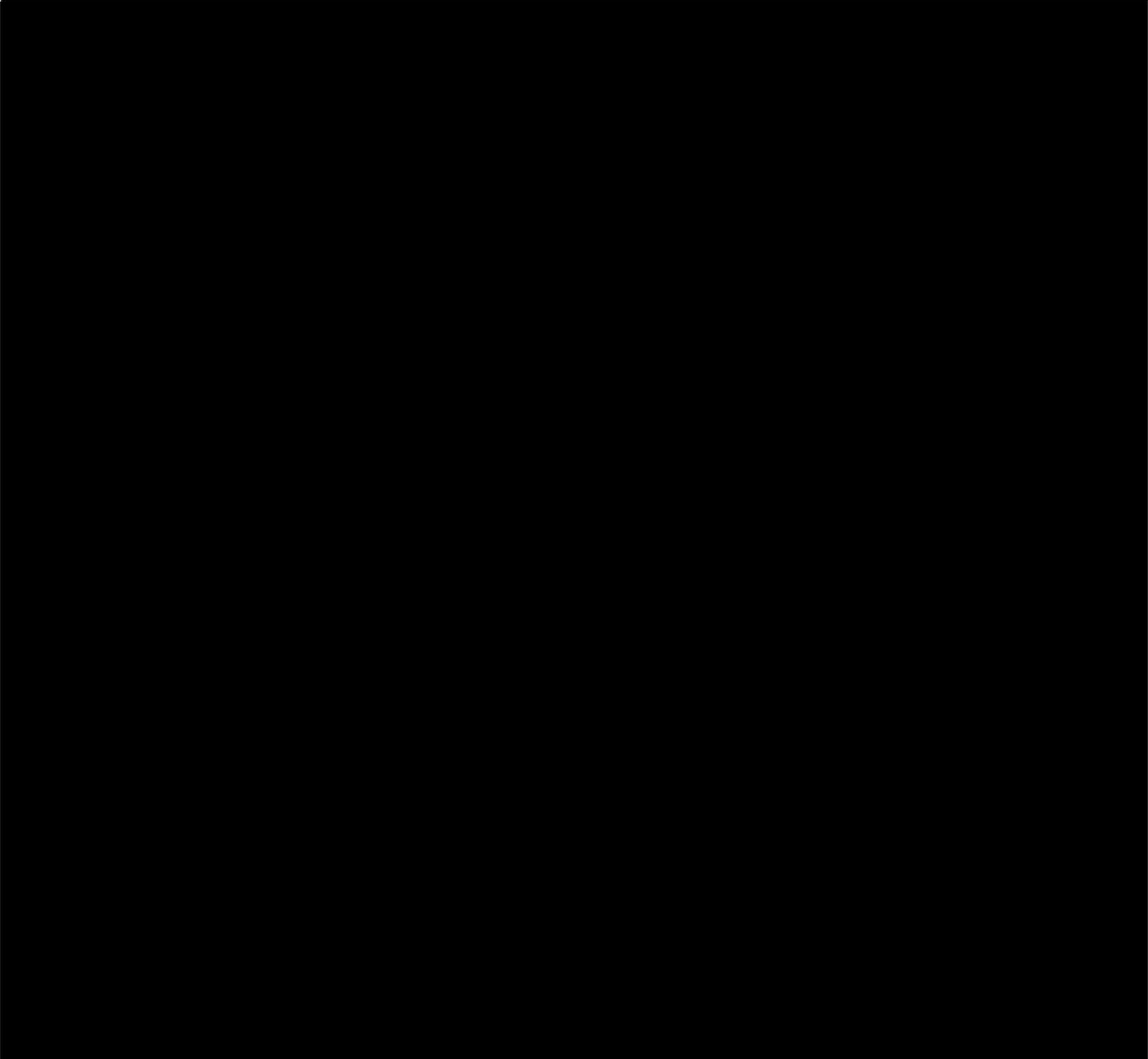
96

Messages in chronological order (times are shown in GMT -05:00)



ISC015889



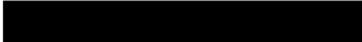


NC Nadu CELL [REDACTED] 1/21/2022, 11:46 AM
Can [REDACTED] come pick up her check today that she never picked up it was supposed to be for \$750

[REDACTED] **Individual 1** [REDACTED] 1/21/2022, 11:49 AM
Ohh that I can't help with...our account is in a negative balance and lots of checks became over drafted I have been paying cash to our people this week...ask her to wait till Monday and hopefully someone will put some funds in our account (or maybe ask edwin)

NC Nadu CELL [REDACTED] 1/21/2022, 11:49 AM
Ok

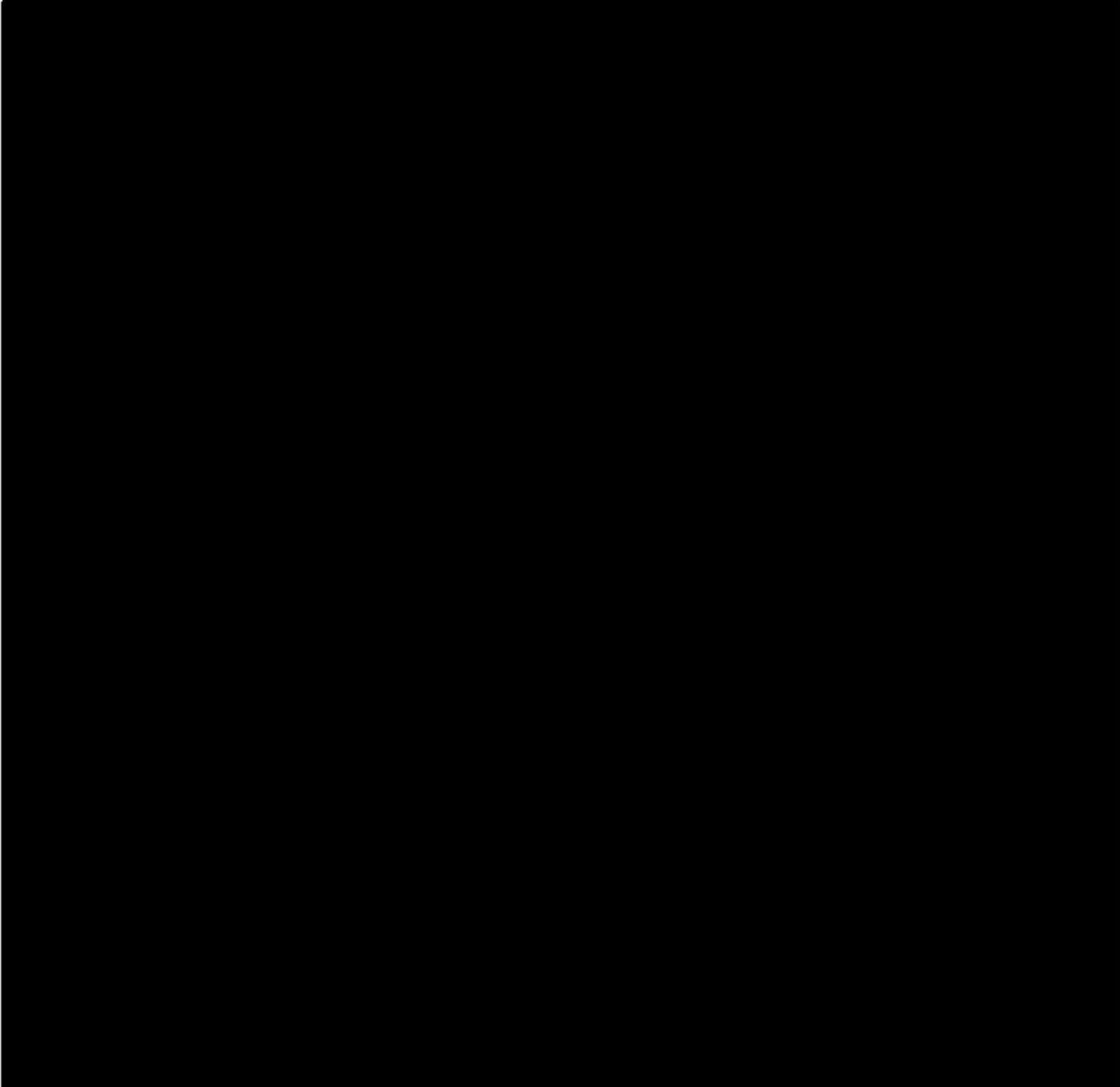
NC Nadu CELL [REDACTED] 1/21/2022, 12:07 PM
No worries I told her office is closed



Individual 1

1/21/2022, 12:08 PM

Excellent thanks I'm sure this will be worked out by Monday have a blessed day



Individual 1

1/25/2022, 5:51 PM

No worries...besides are we paying anyone else next week? Edwin needs us to give him a number.

NC

Nadu CELL

1/25/2022, 5:55 PM

We have payroll this Friday

NC

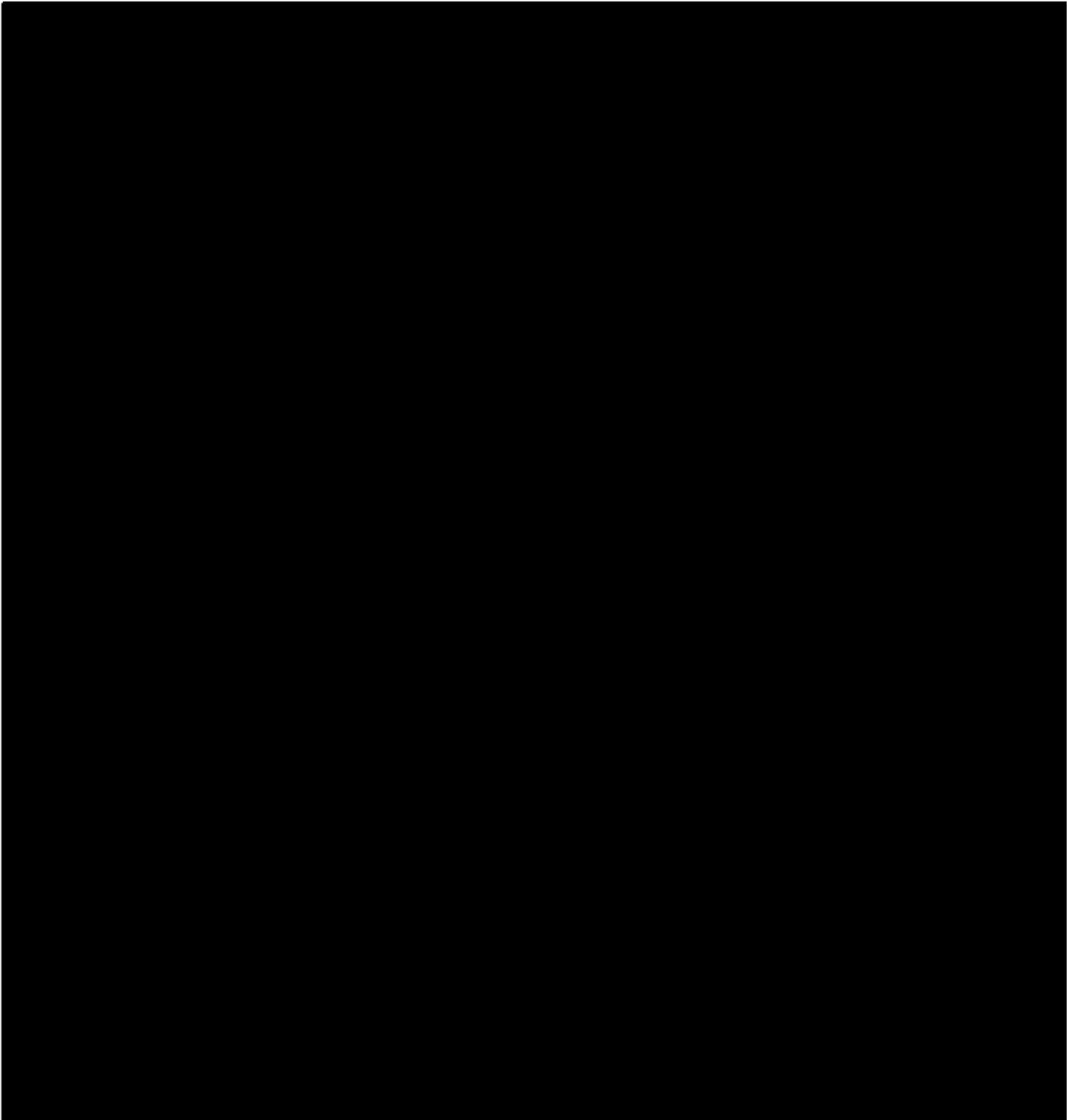
Nadu CELL

1/25/2022, 6:04 PM

and as salary people than

16 ppl total who need to be paid for 1/9-1/11

ISC015891



Individual 1

1/28/2022, 12:46 PM

got the palm beach checks and her own...we will give the rest...checking today

NC

Nadu CELL

1/28/2022, 12:47 PM

Thank you

ISC015892



EXHIBIT 12

WhatsApp



Hector

04/06/2021 09:06:44

COS5sYMG:

Assuming you heard, Alcee died this morning.

04/06/2021 09:52:07

CifPsYMG:

█ and I can make time to meet today or tomorrow. But it needs to happen quick.

04/06/2021 09:52:18

Today,

04/06/2021 09:52:24

I am on a call

04/06/2021 09:52:27

What time

04/06/2021 09:52:50

CLLPsYMG:

It's 10am now...how about 2:30pm?

04/06/2021 09:53:09

Ok that works

04/06/2021 09:53:10

CMbPsYMG:

At the miramar office or your parents house?

04/06/2021 09:53:49

C03PsYMG:

Where

04/06/2021 09:54:00

Office

04/06/2021 09:54:07

CP/PsYMG:

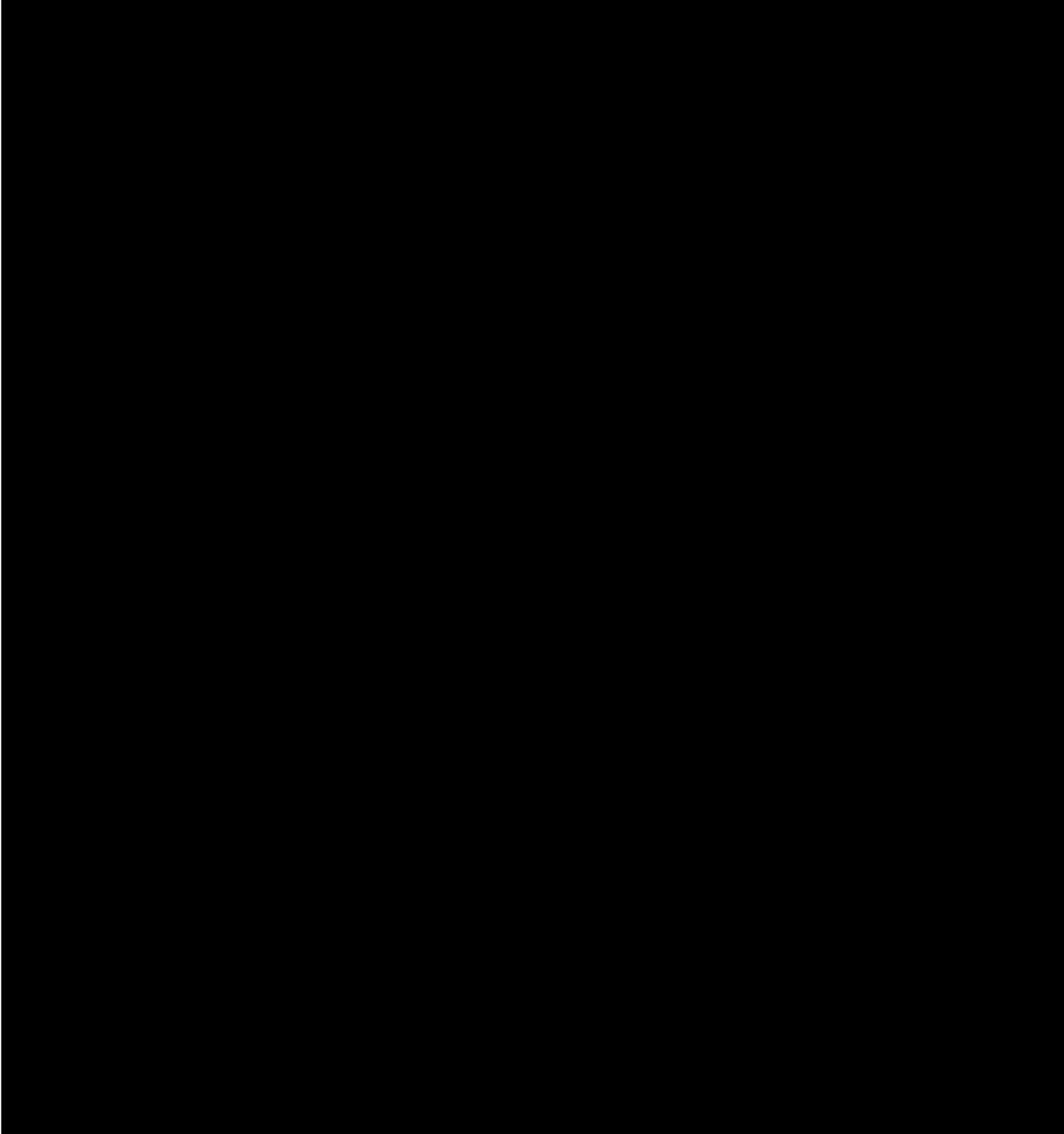
oK. See you there

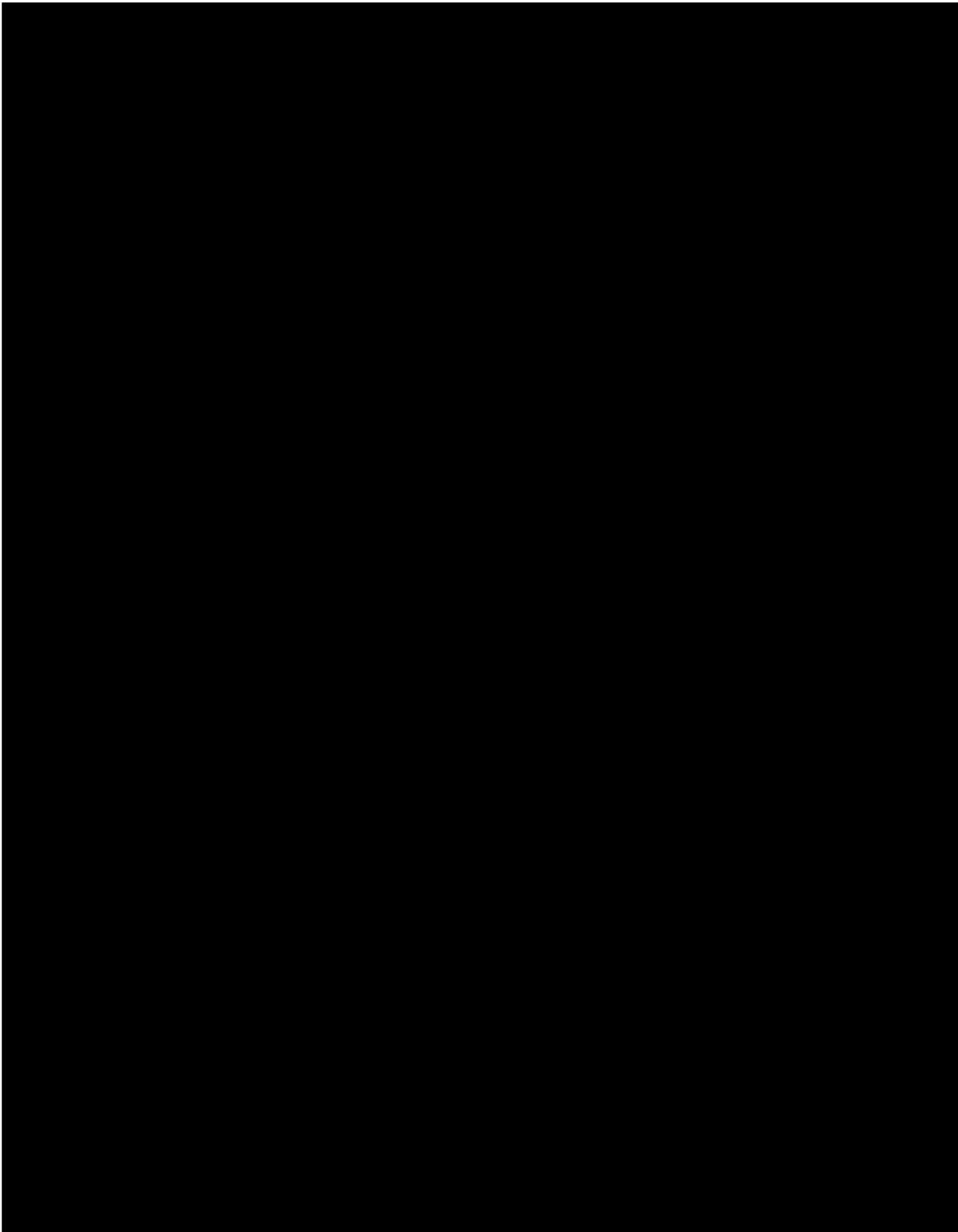
04/06/2021 10:14:18

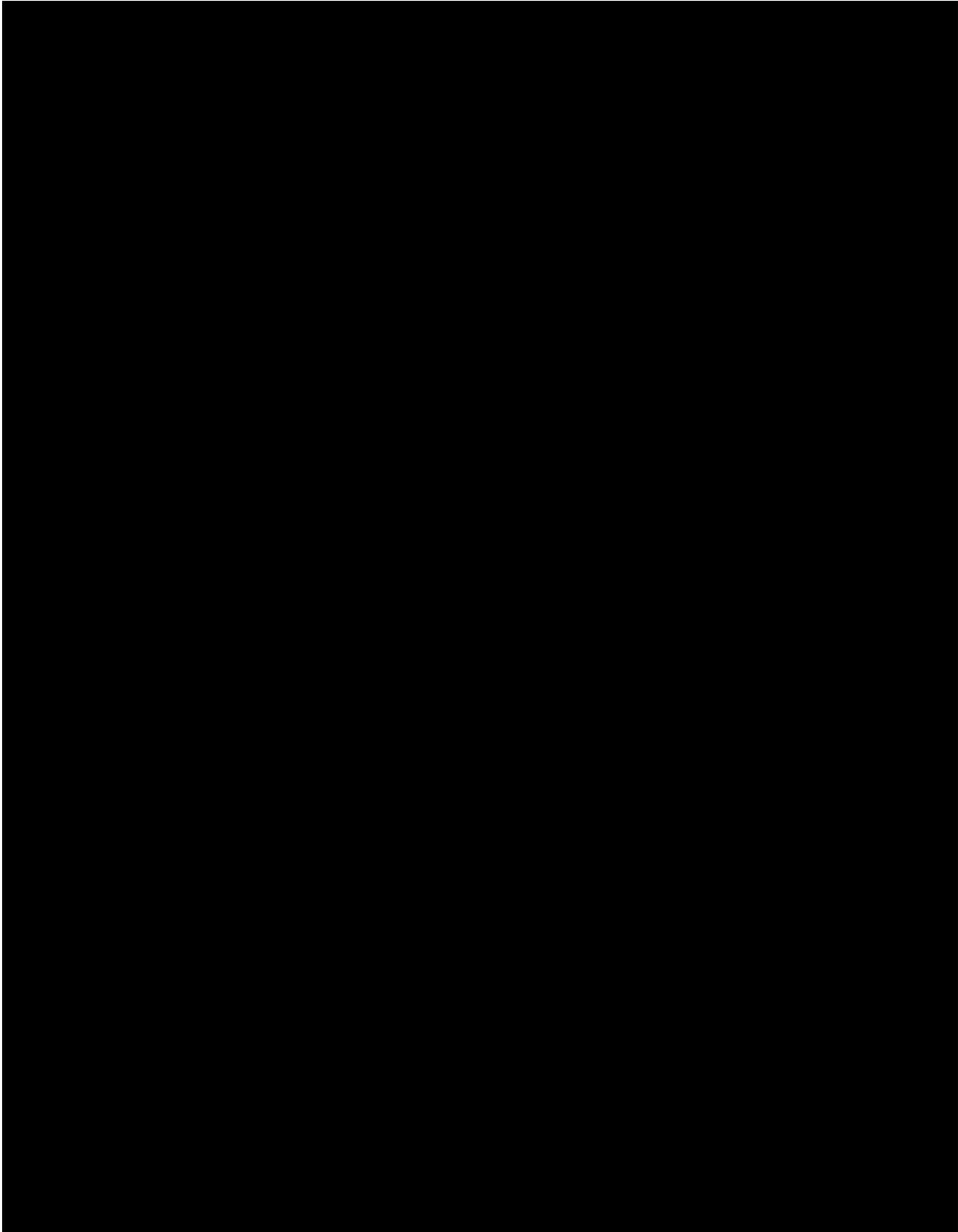
CLrZsYMG:
At least 90 days

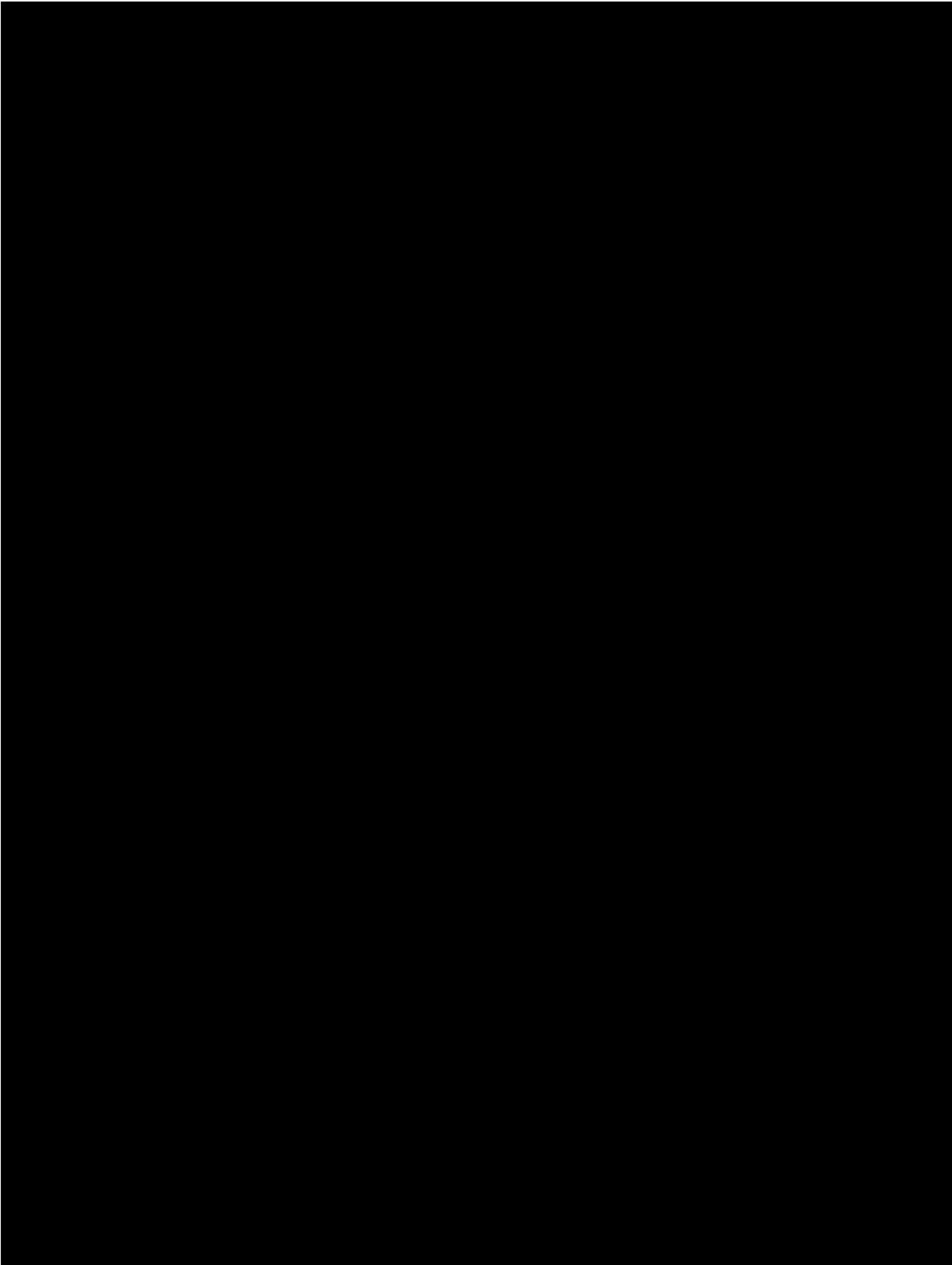
04/06/2021 10:15:54

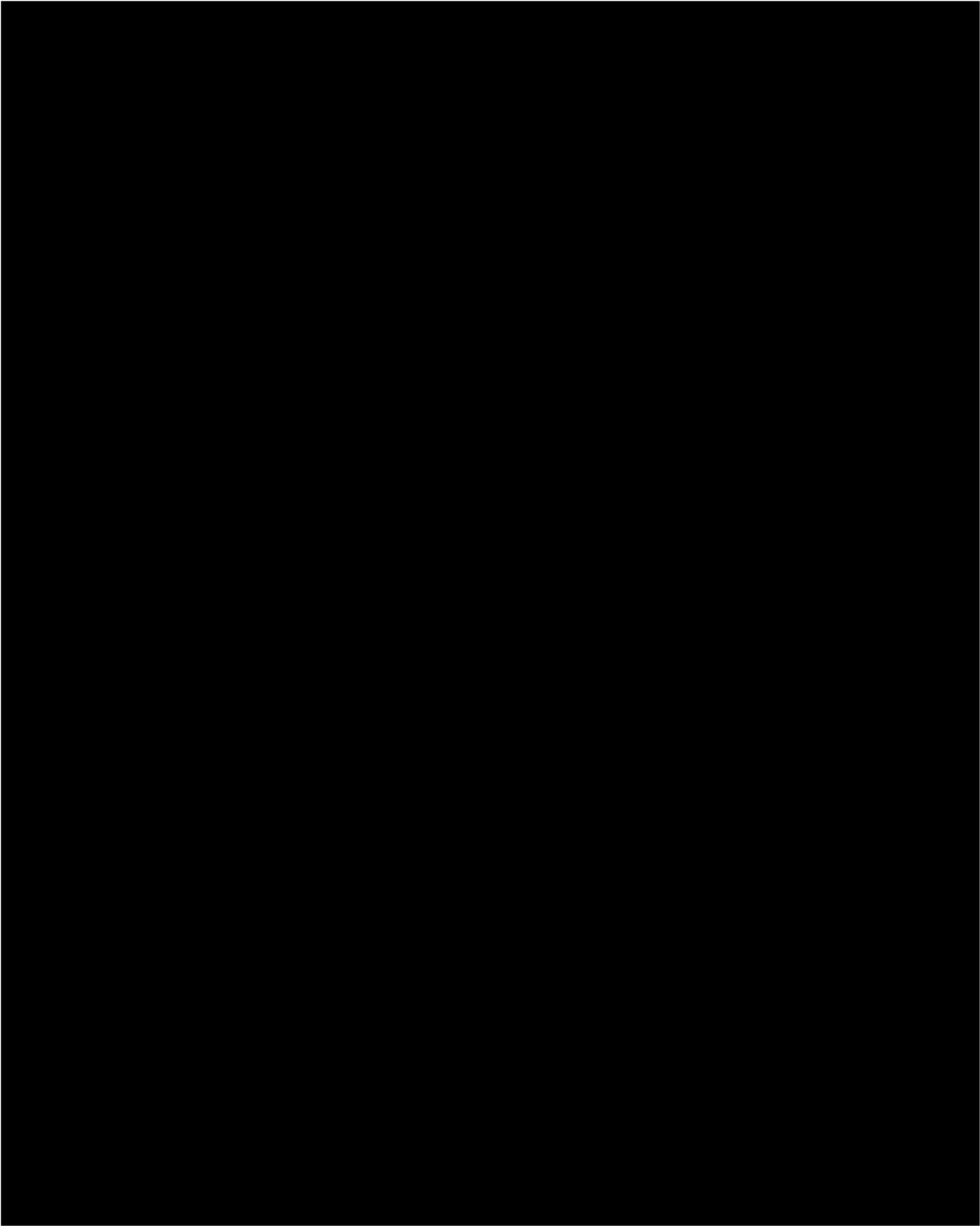
CJrasYMG:
We'll talk about it later. See you then.

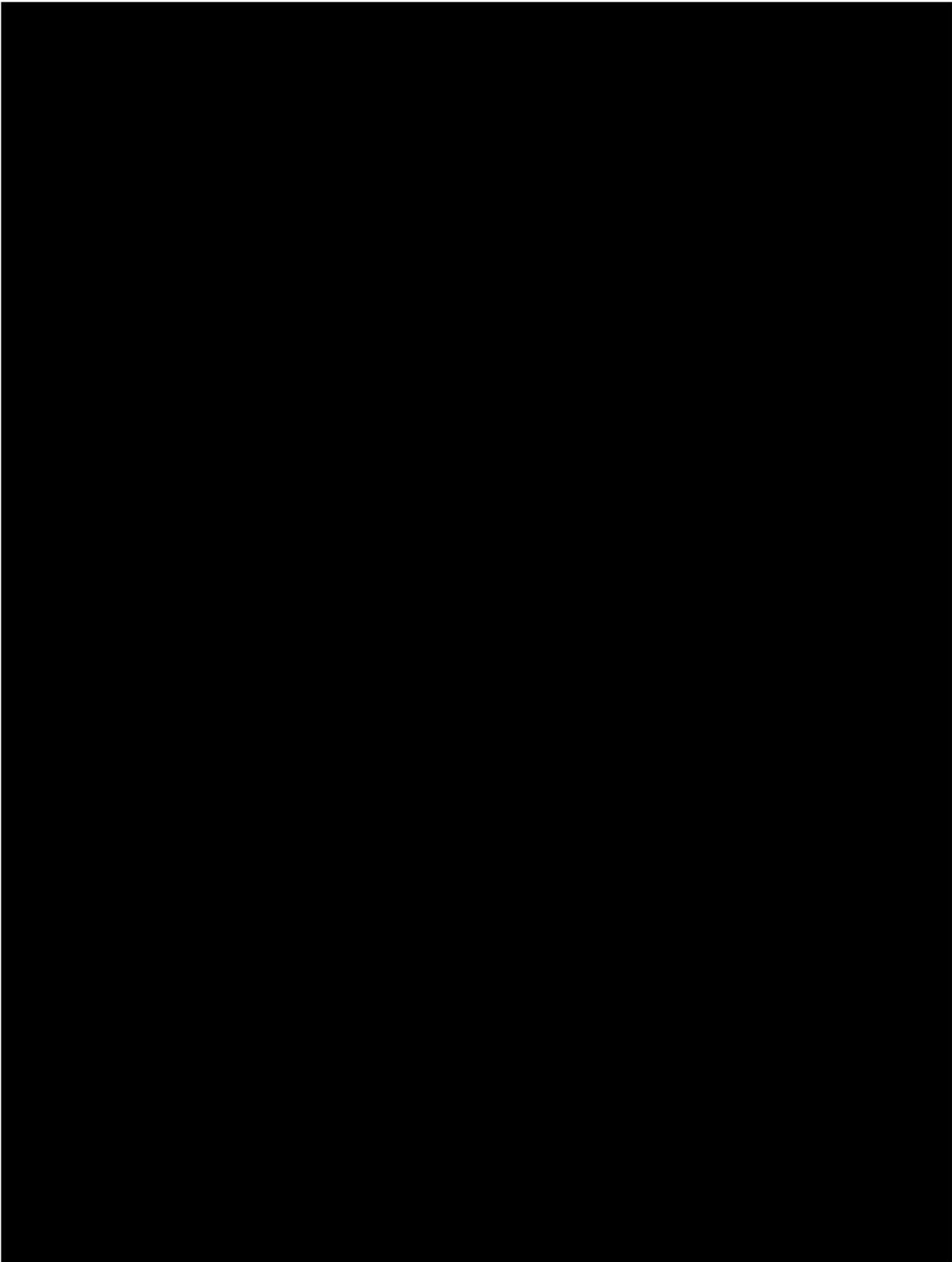


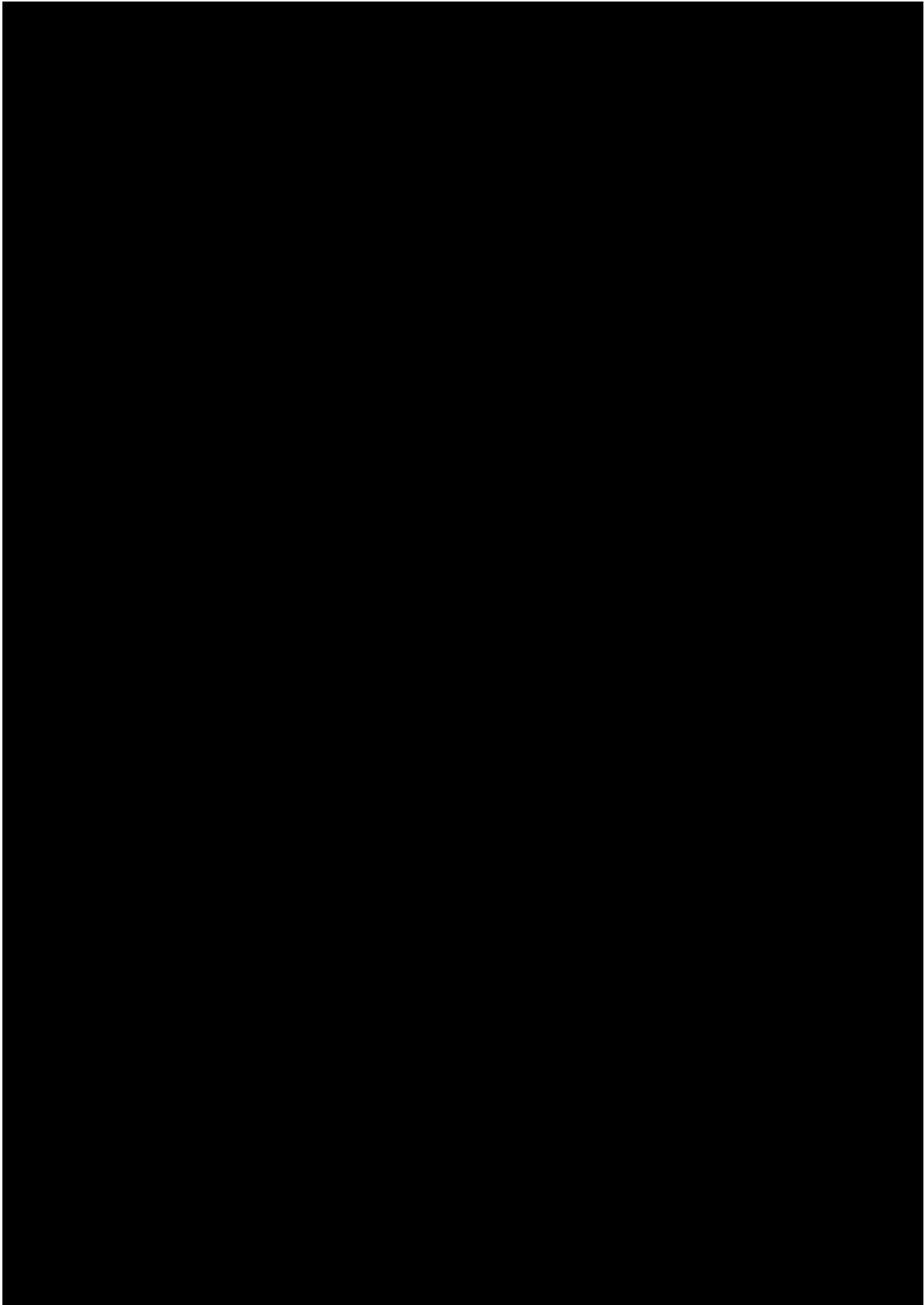


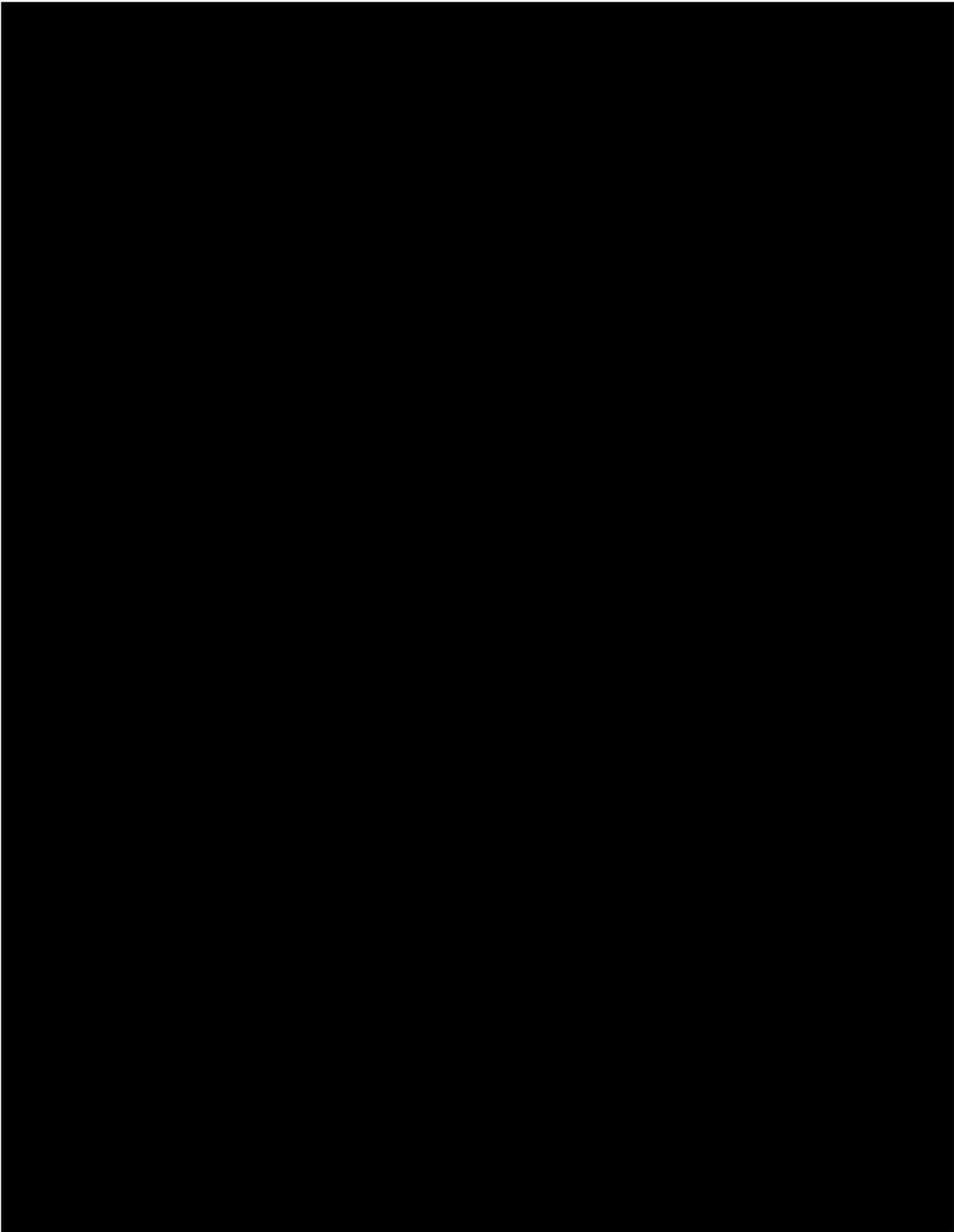


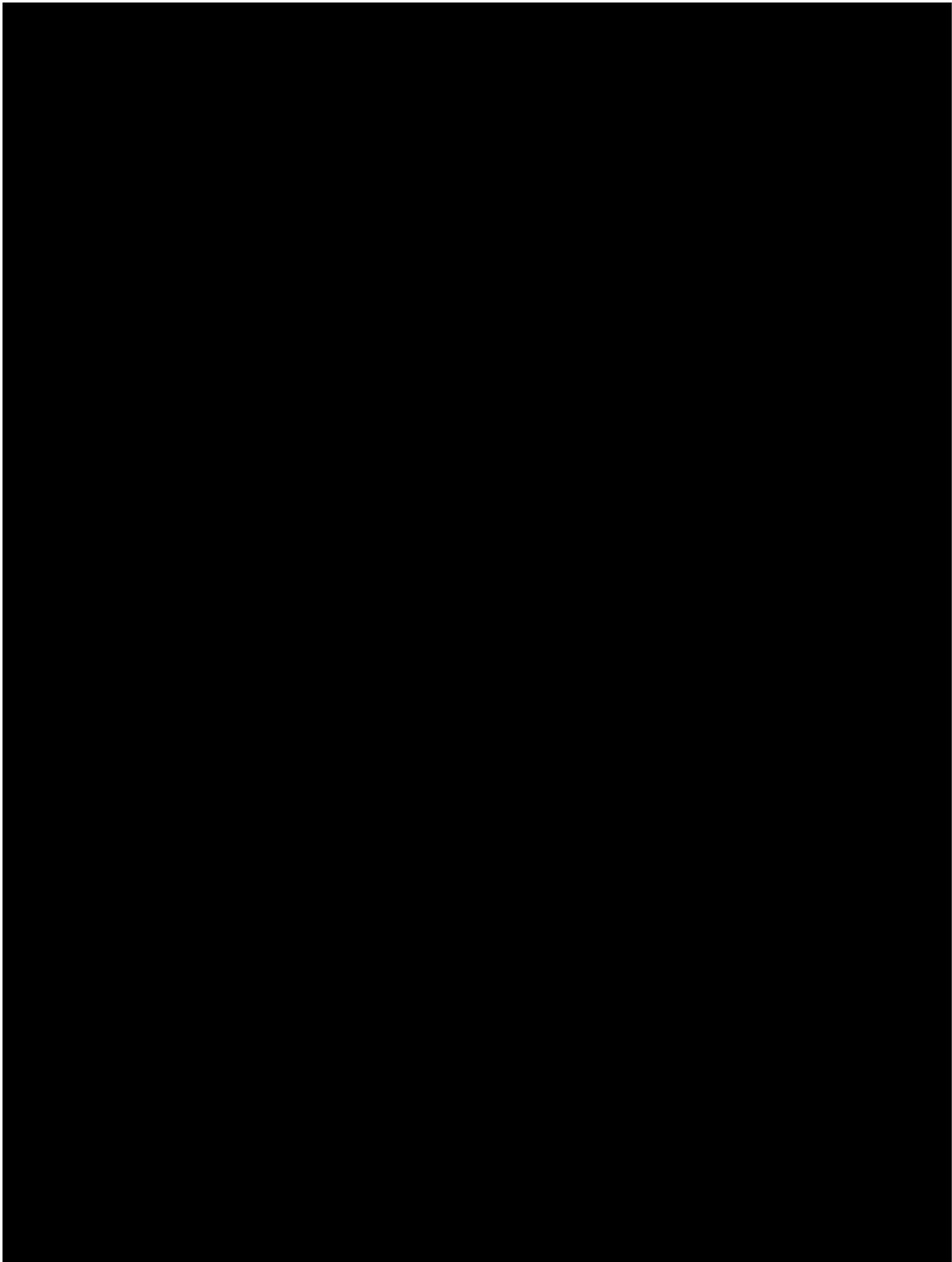


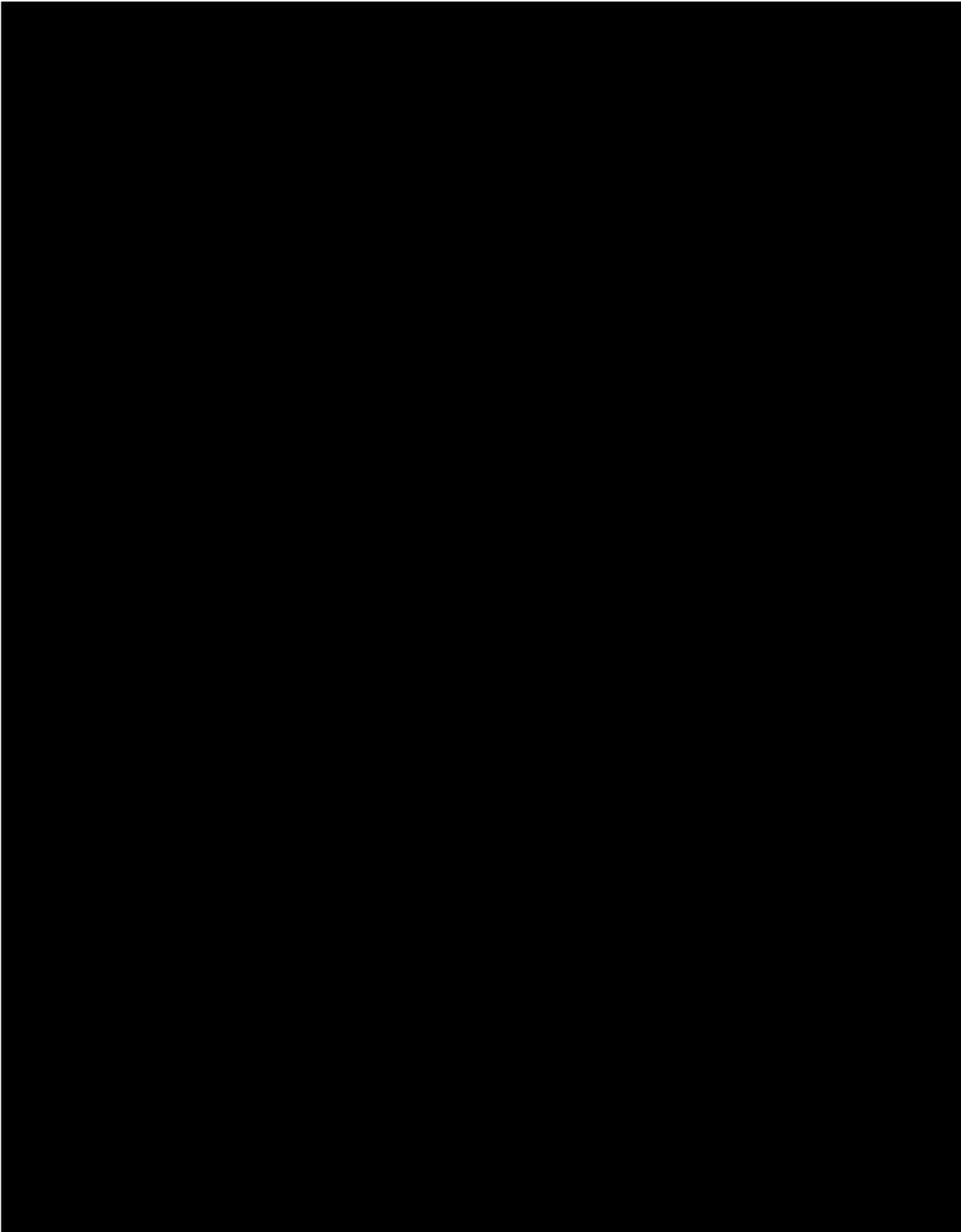


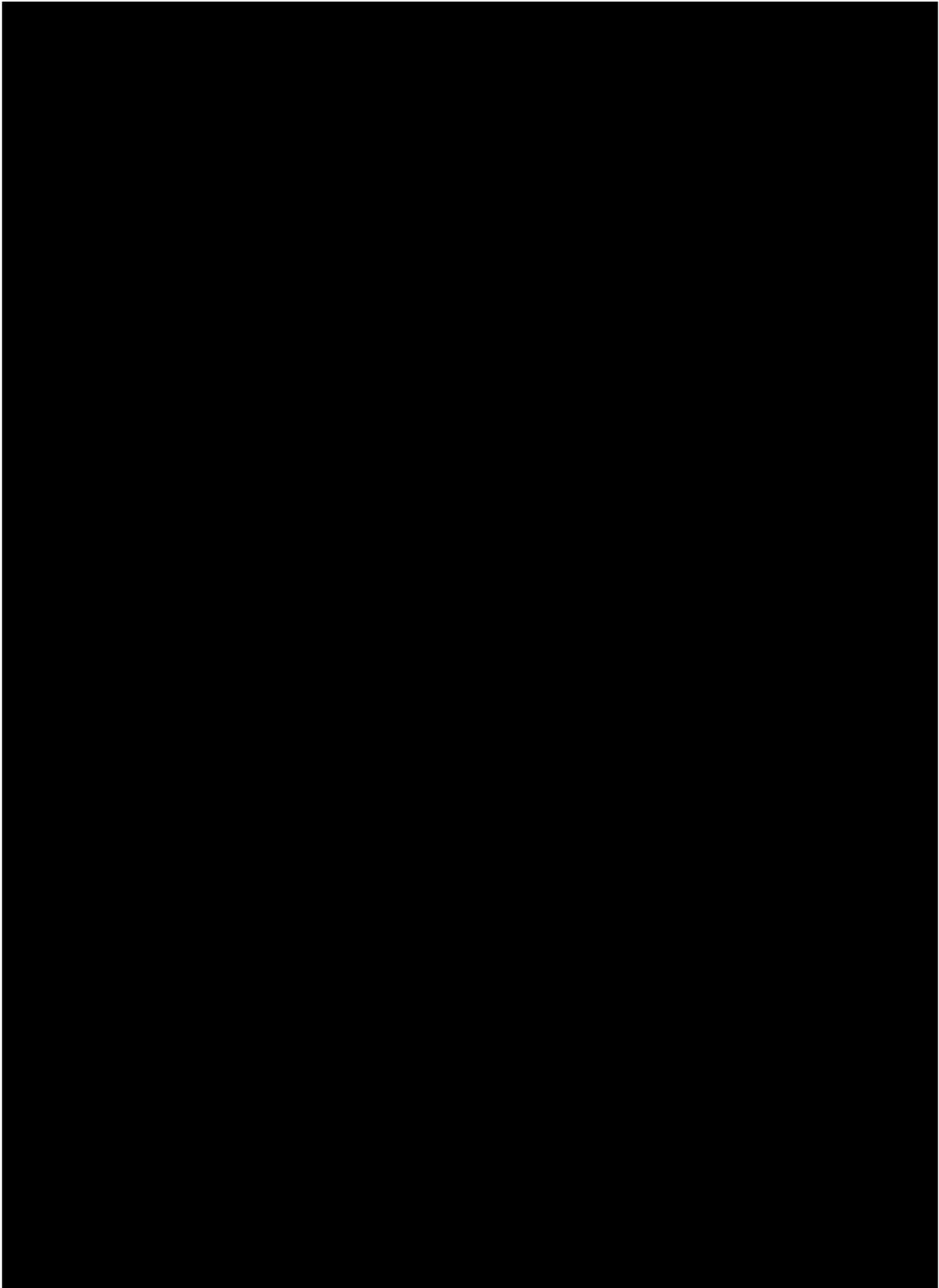


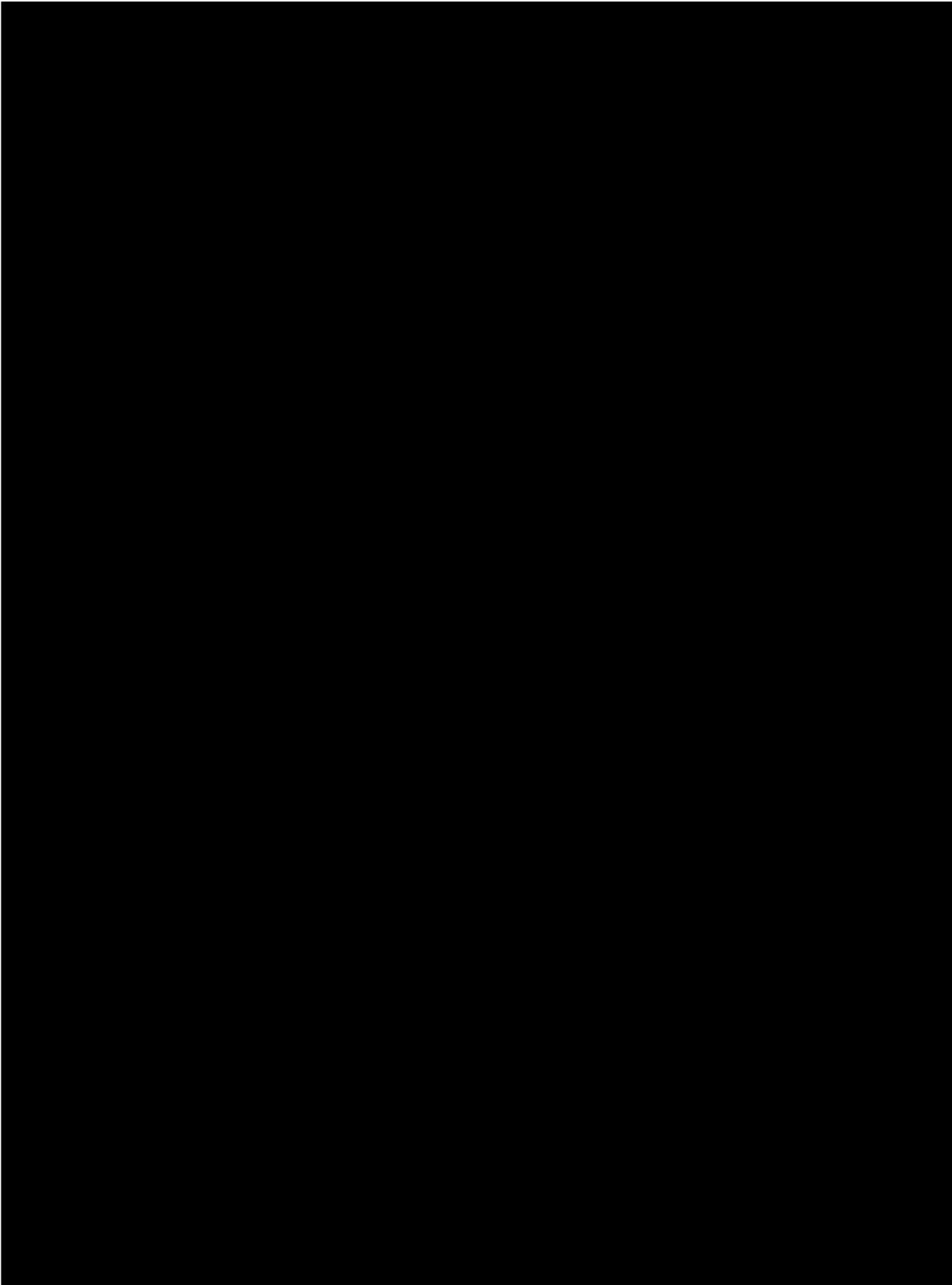


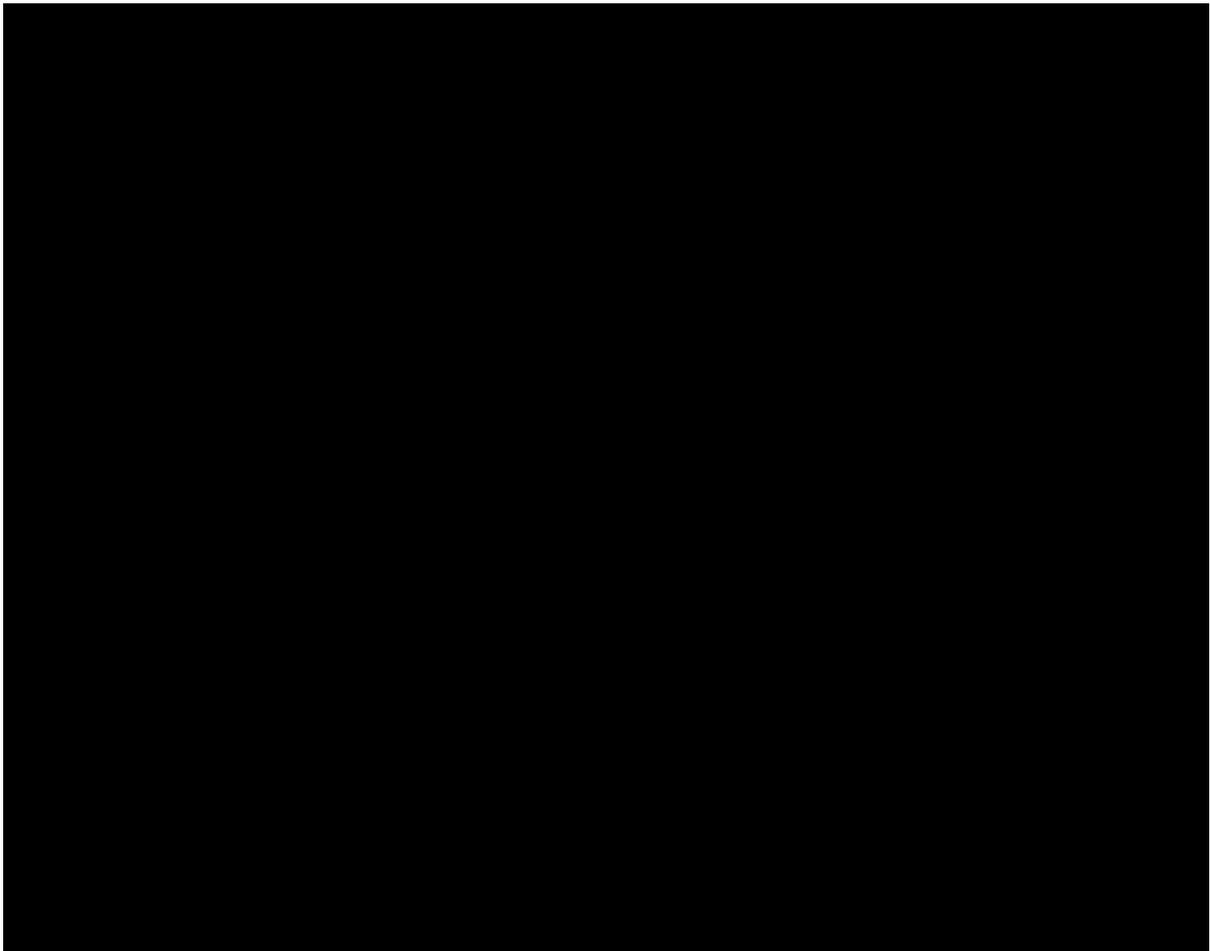












05/03/2021 11:06:50

ClqjwIQG:
Finance Instructions

To wire directly to LinA
Total amount \$14,500

This reflects the following:

Individual reimbursement \$3,500
Individual May payment \$8,000 (Individual is not charging at all for any work in April)
Individual \$3,000

To wire directly to AIF
Total amount \$6,750

This reflects the following:

Hector April payment \$1,250 (Hector is only charging for one week in April)
Hector May payment \$5,000
Individual (Media consultant) \$500

05/03/2021 11:07:22

CKqjwIQG:
This is not to be paid from the campaign account.

05/03/2021 15:42:36



American integrity is ^{individual 1}?

05/03/2021 15:43:00

CMSkwYQG:

American Integrity is me

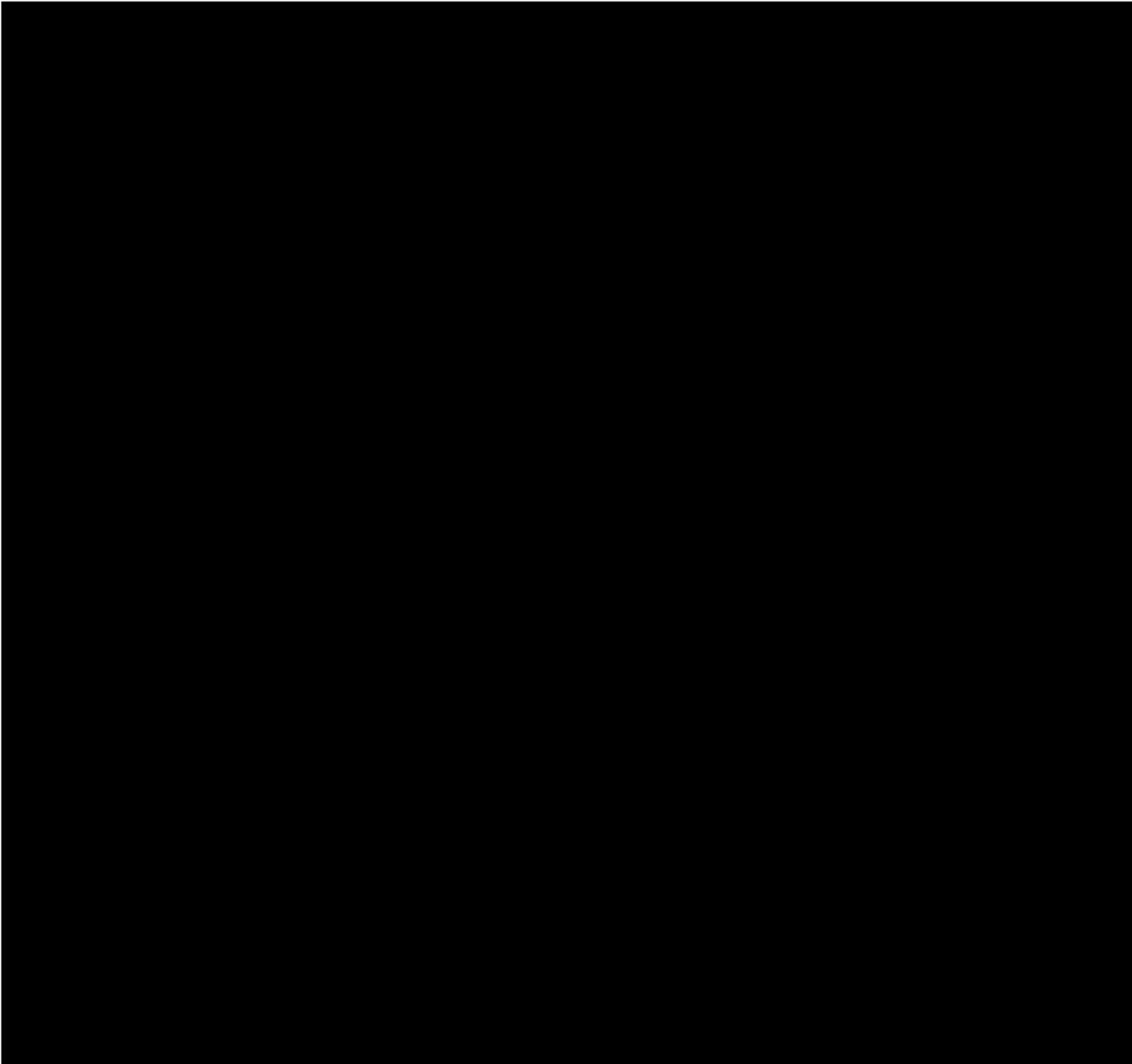
05/03/2021 15:43:14

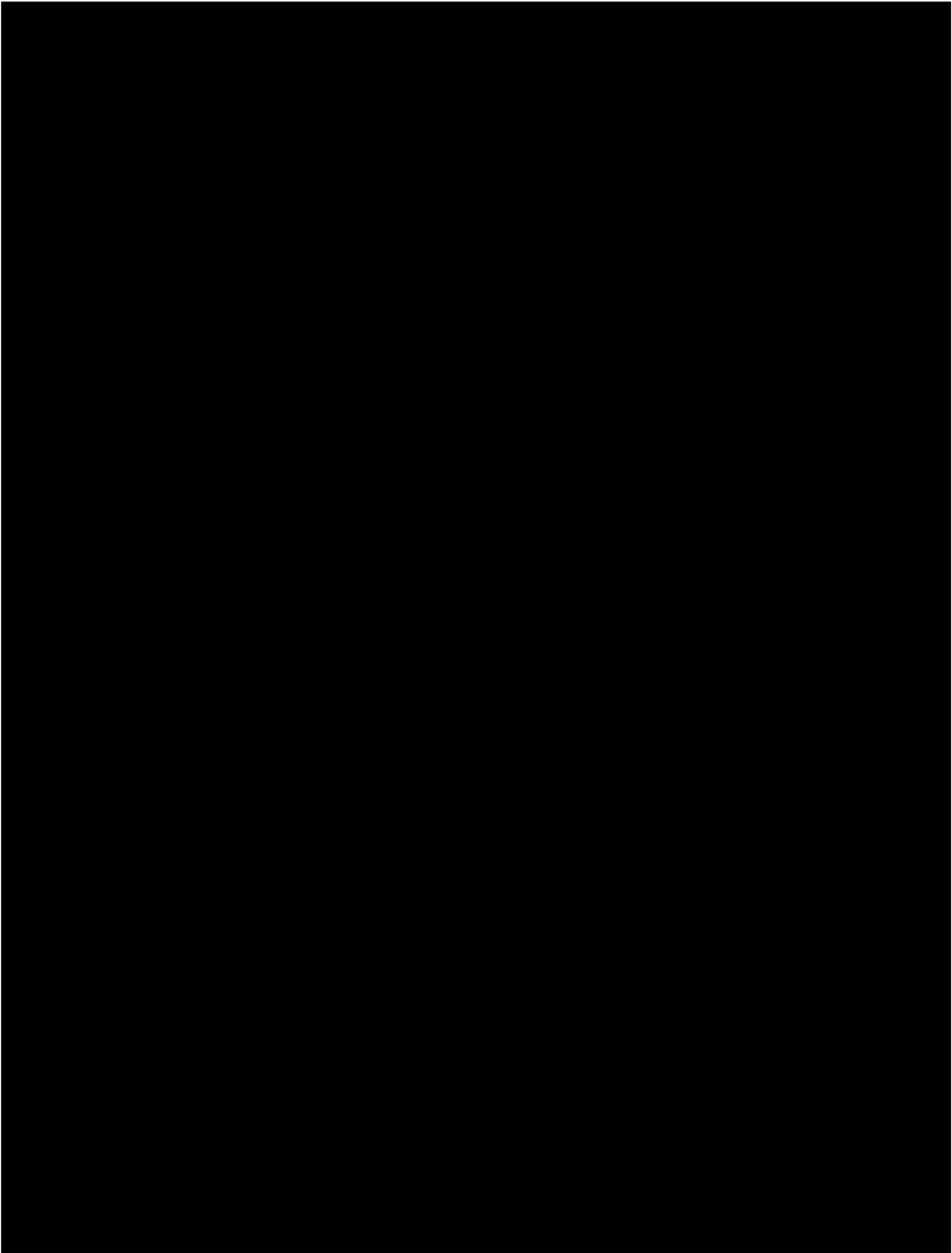
What is ^{individual 1}? I can't find it?

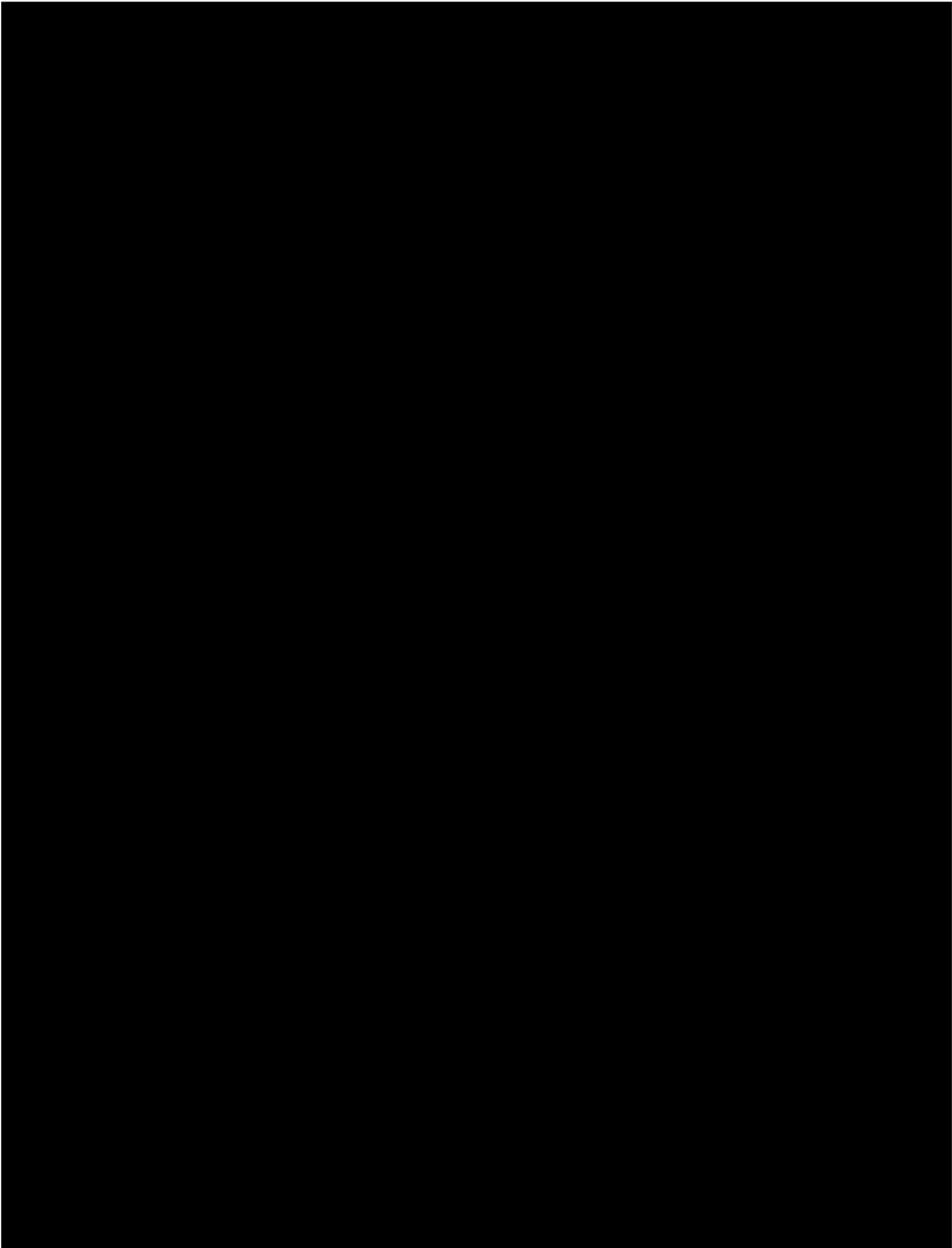
05/03/2021 15:43:27

CN+kwYQG:

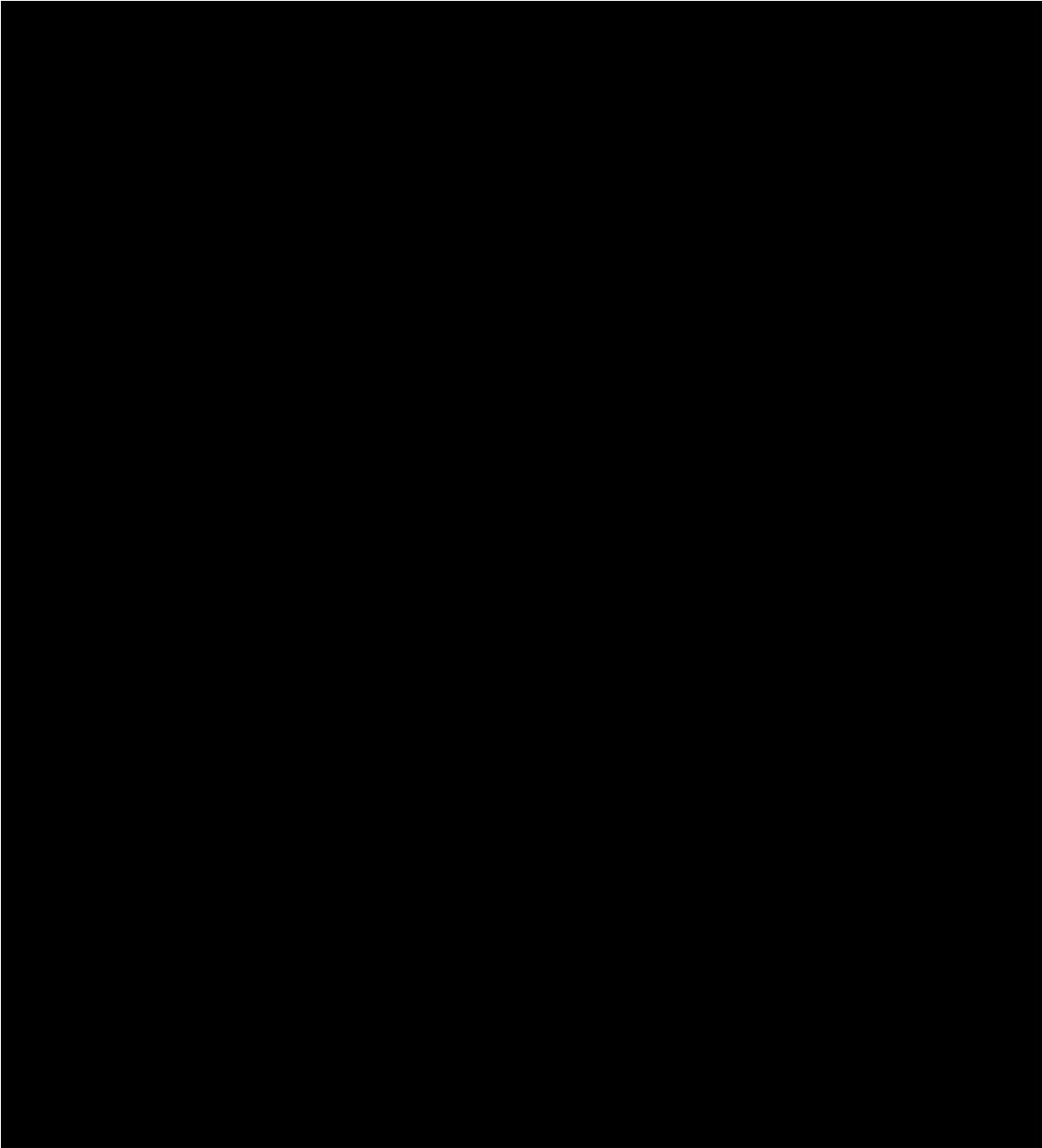
^{individual 1} Leadership in Action

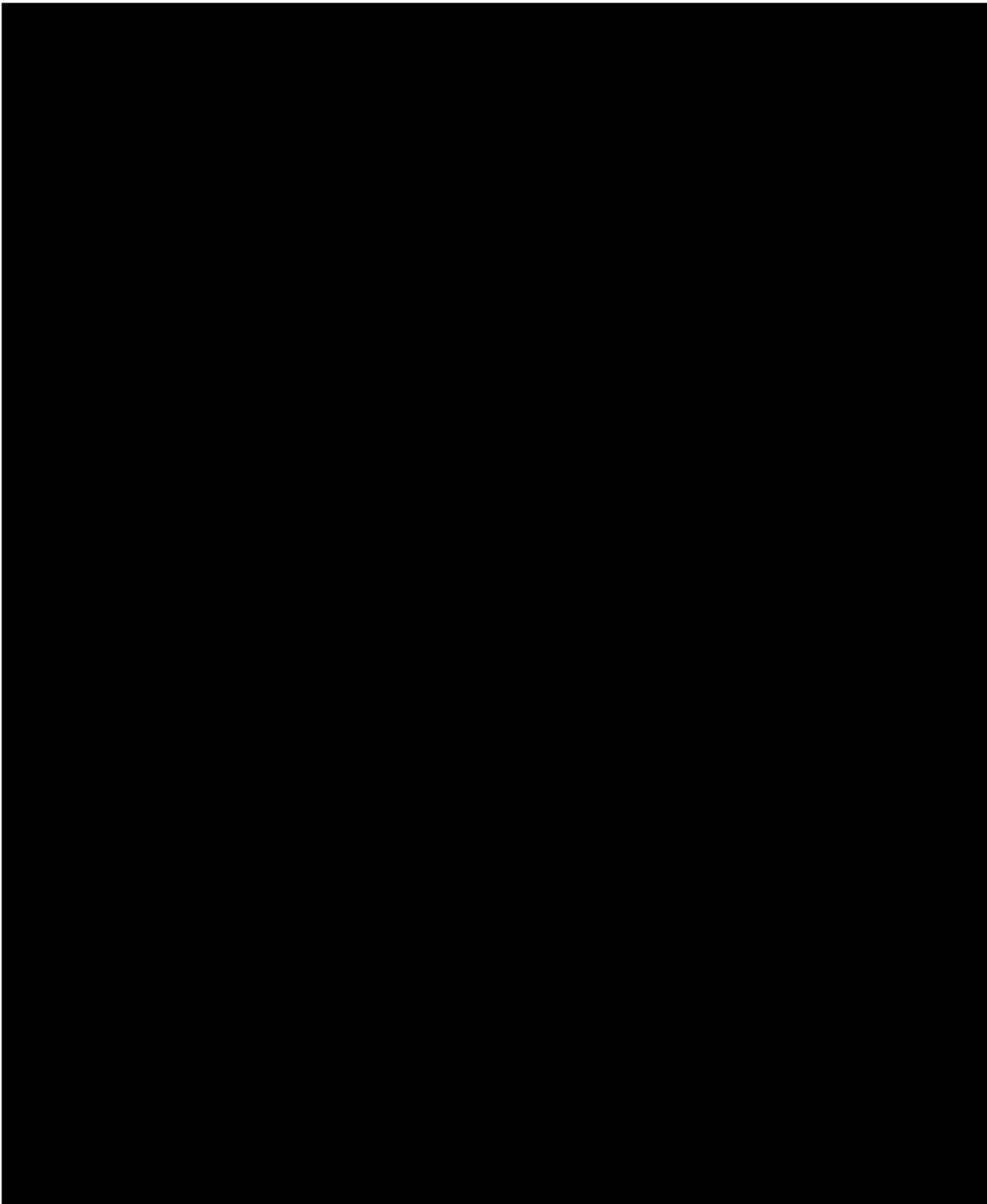


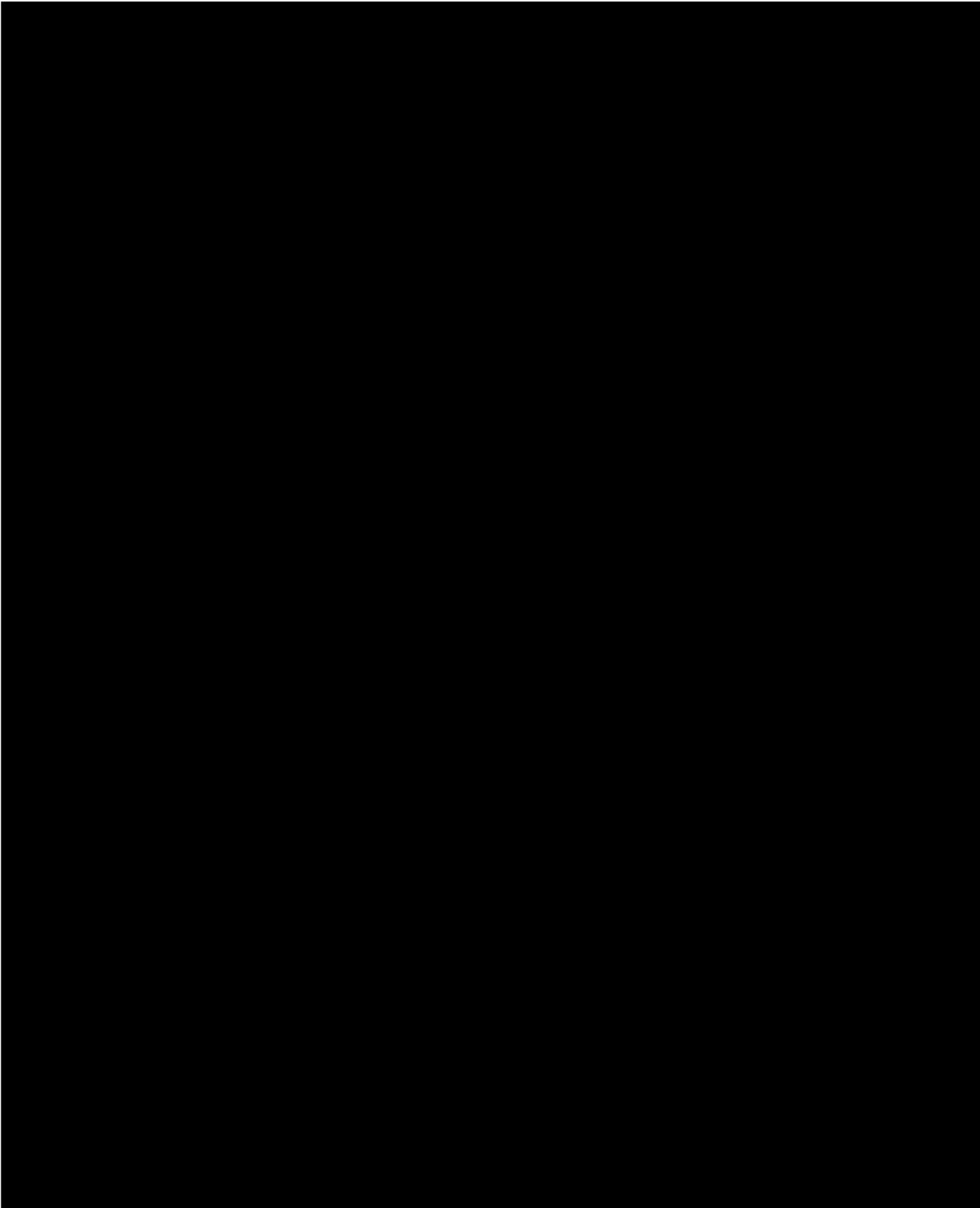












06/09/2021 21:51:55

ISC016501



CLvghYYG:
For Leadership in Action
\$9,552.56 returned and another
\$8,000 contribution
Total for LIA
\$17,552.56

From campaign account:
Marketing campaign rollout total
\$183,646
+ \$4,000 to double amount of [REDACTED] buy on NBC5 WPTV you asked for +
\$6,000 Hot105/99Jamz
Total
\$193,646

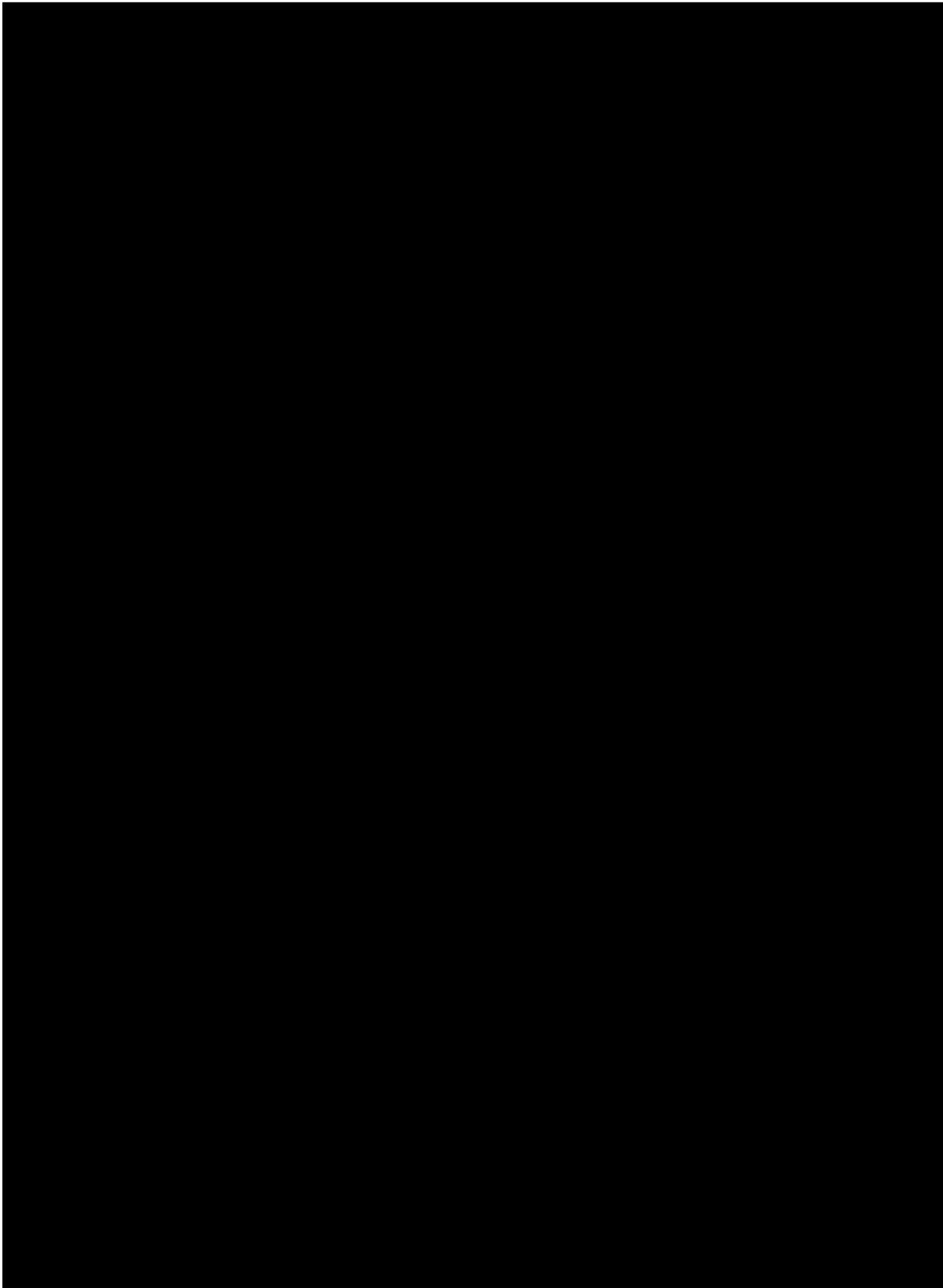


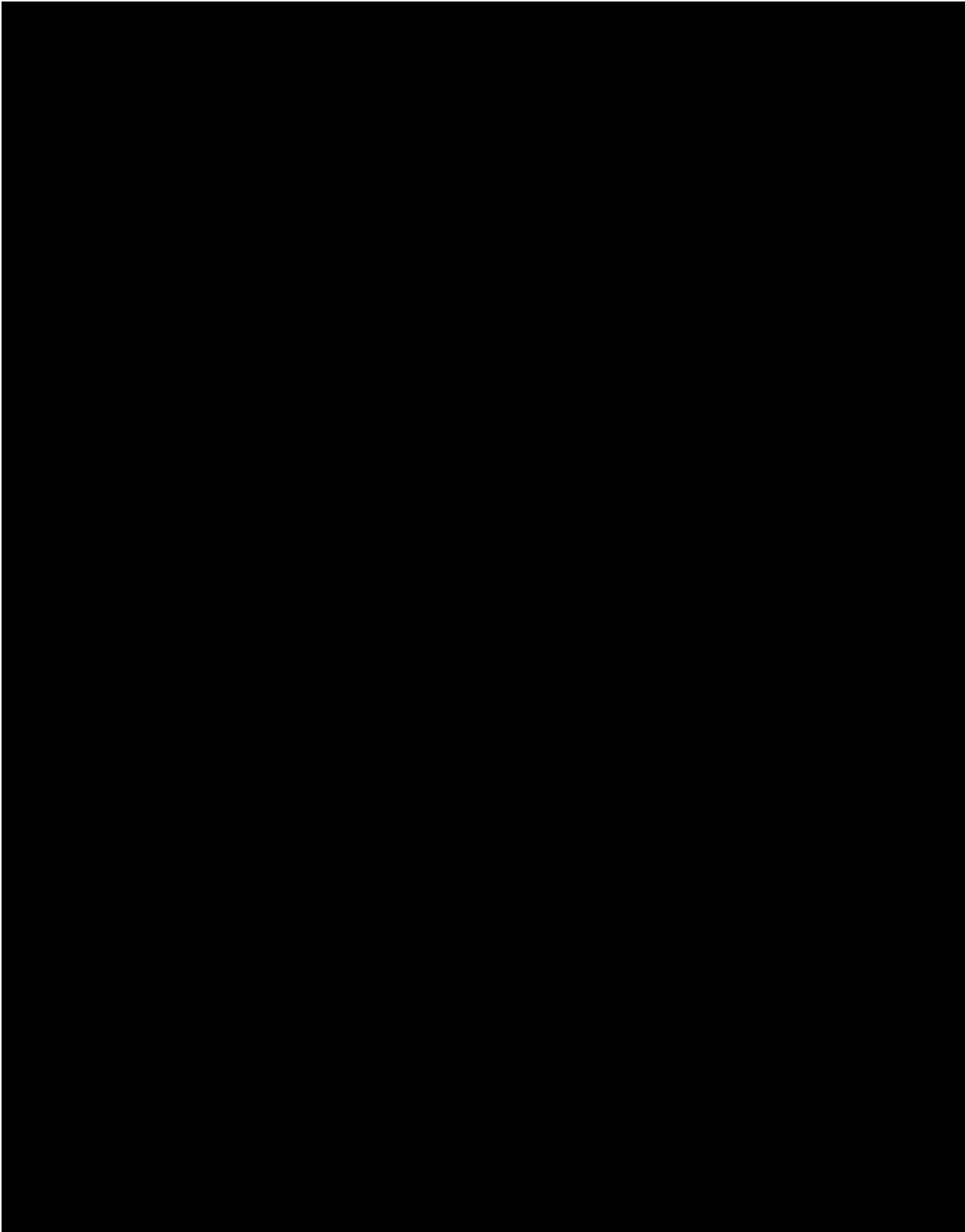
07/06/2021 14:22:01

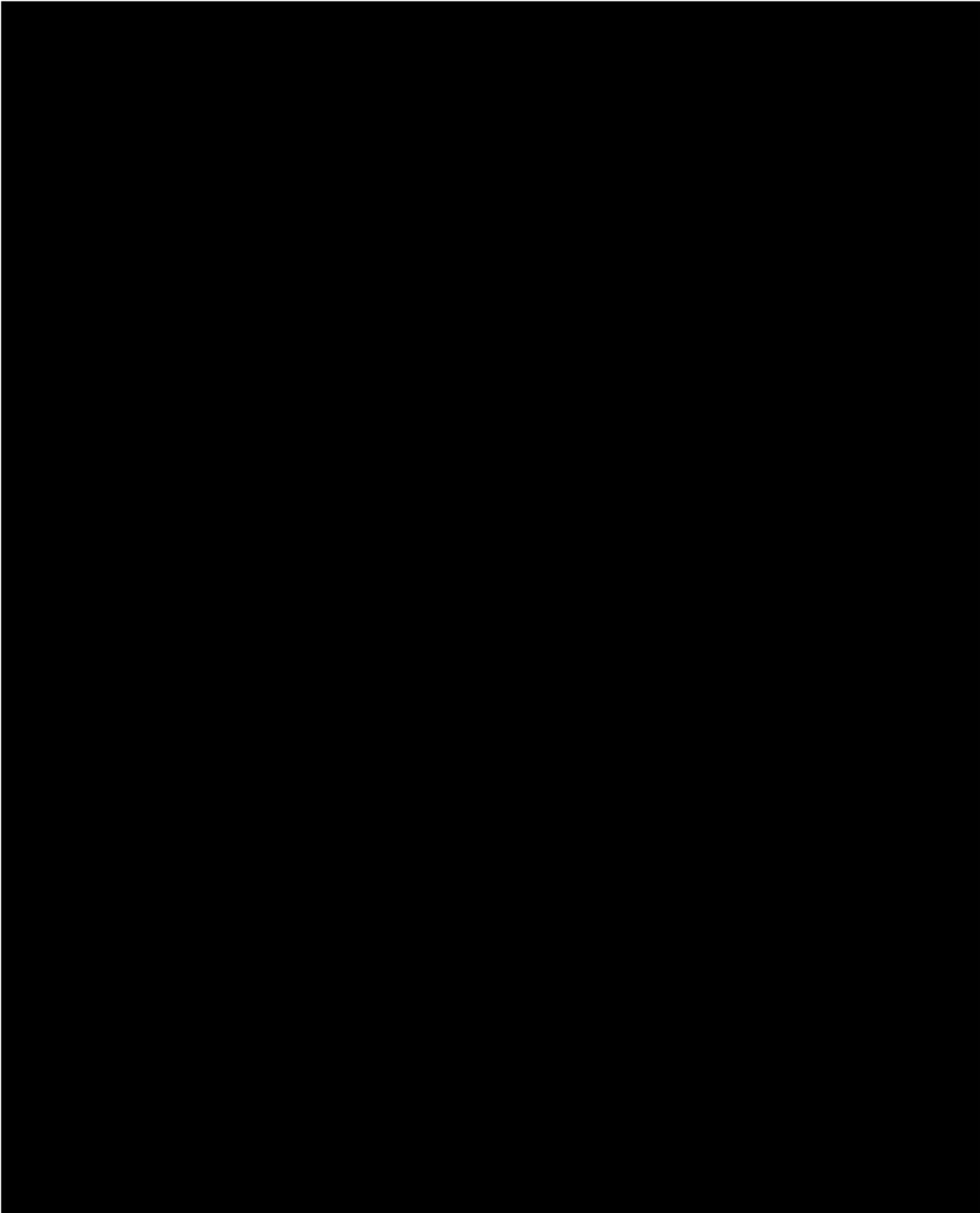
CMm+kocG:
Hi Sheila, I needed to follow up with you about the \$5,500 for expenses this month. If you are wiring that,
could you send it to American Integrity Foundation, Inc.
2630 NE 203 Street Suite 104
Aventura, FL 33180

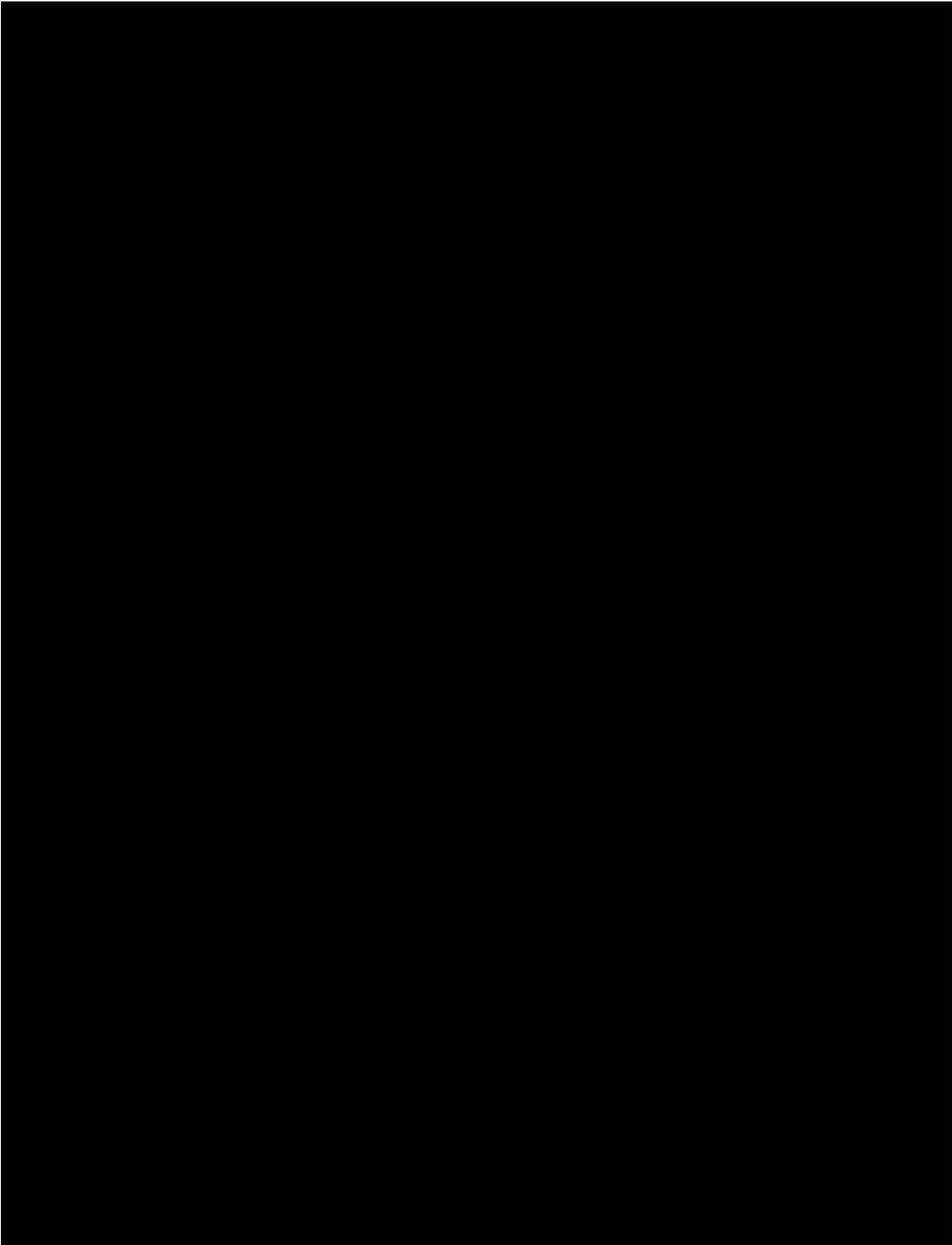
[REDACTED]
[REDACTED]
[REDACTED]

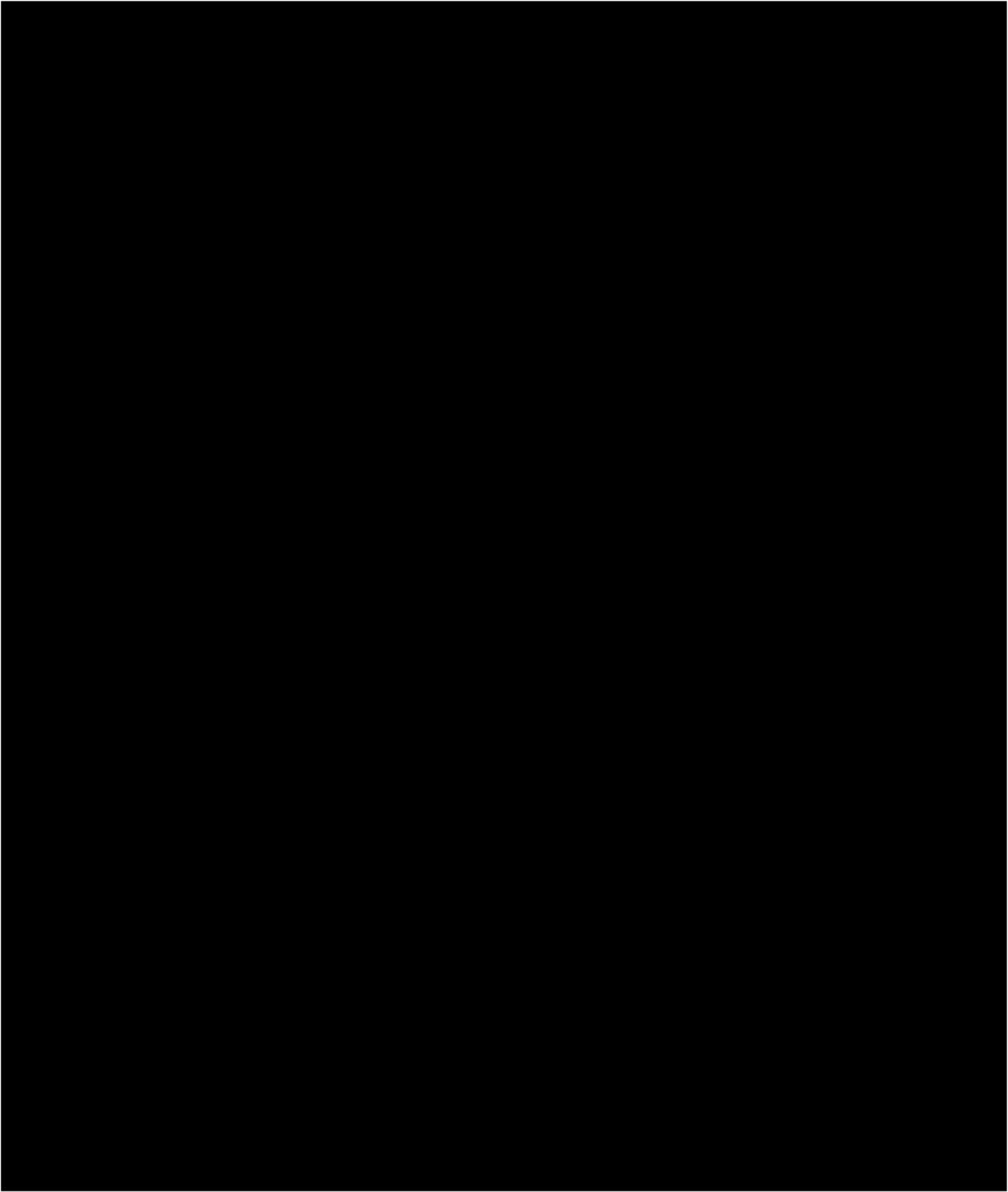


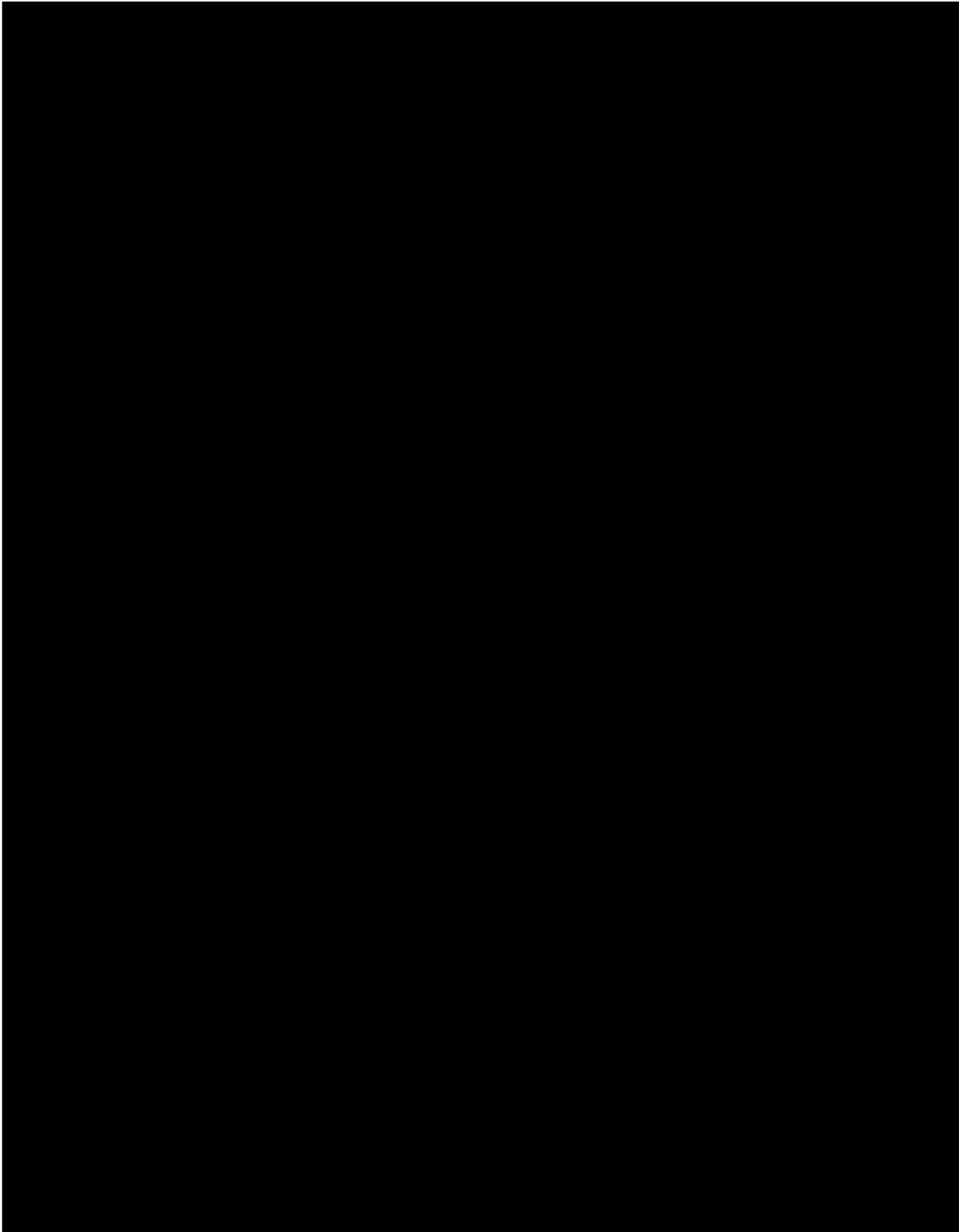


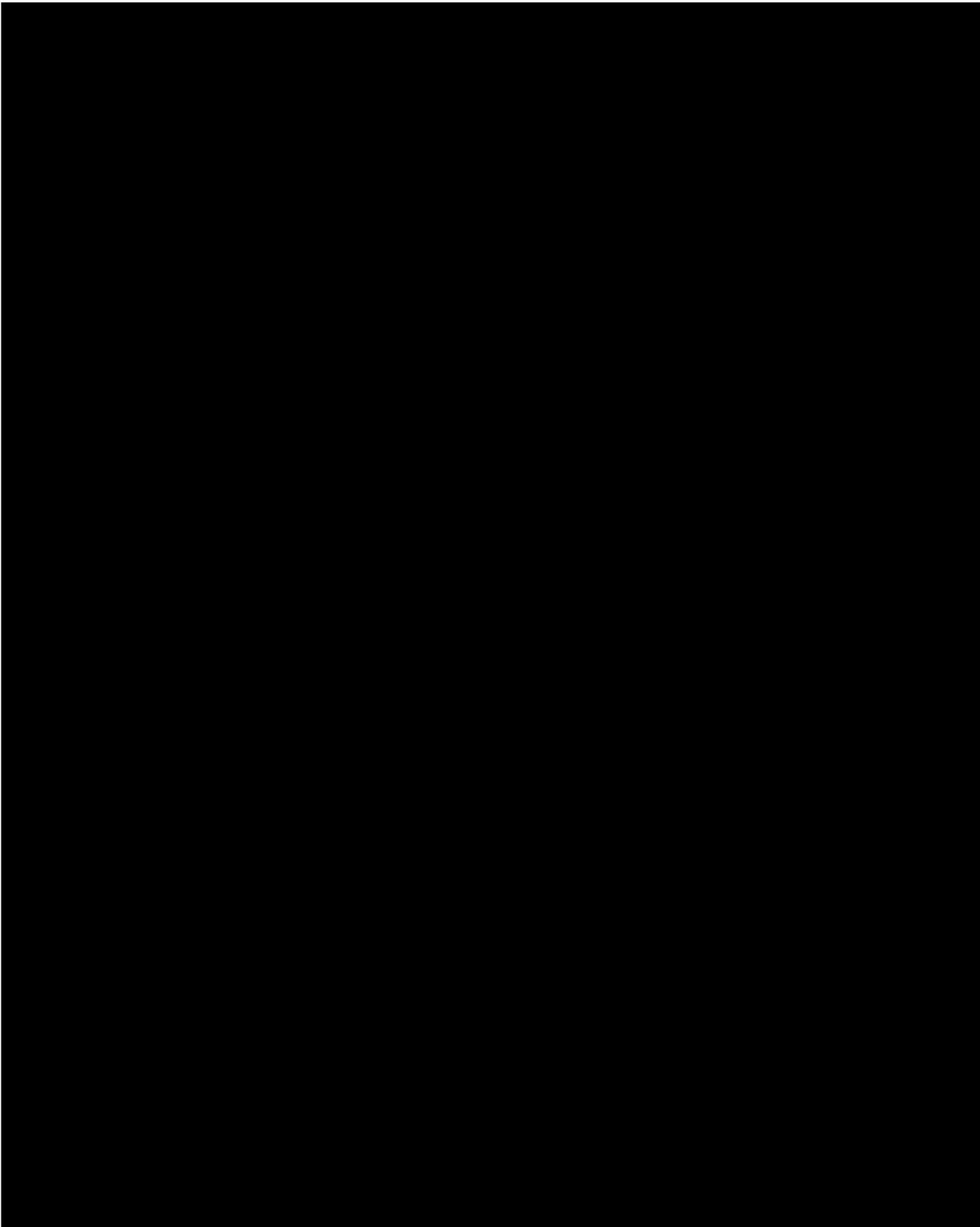


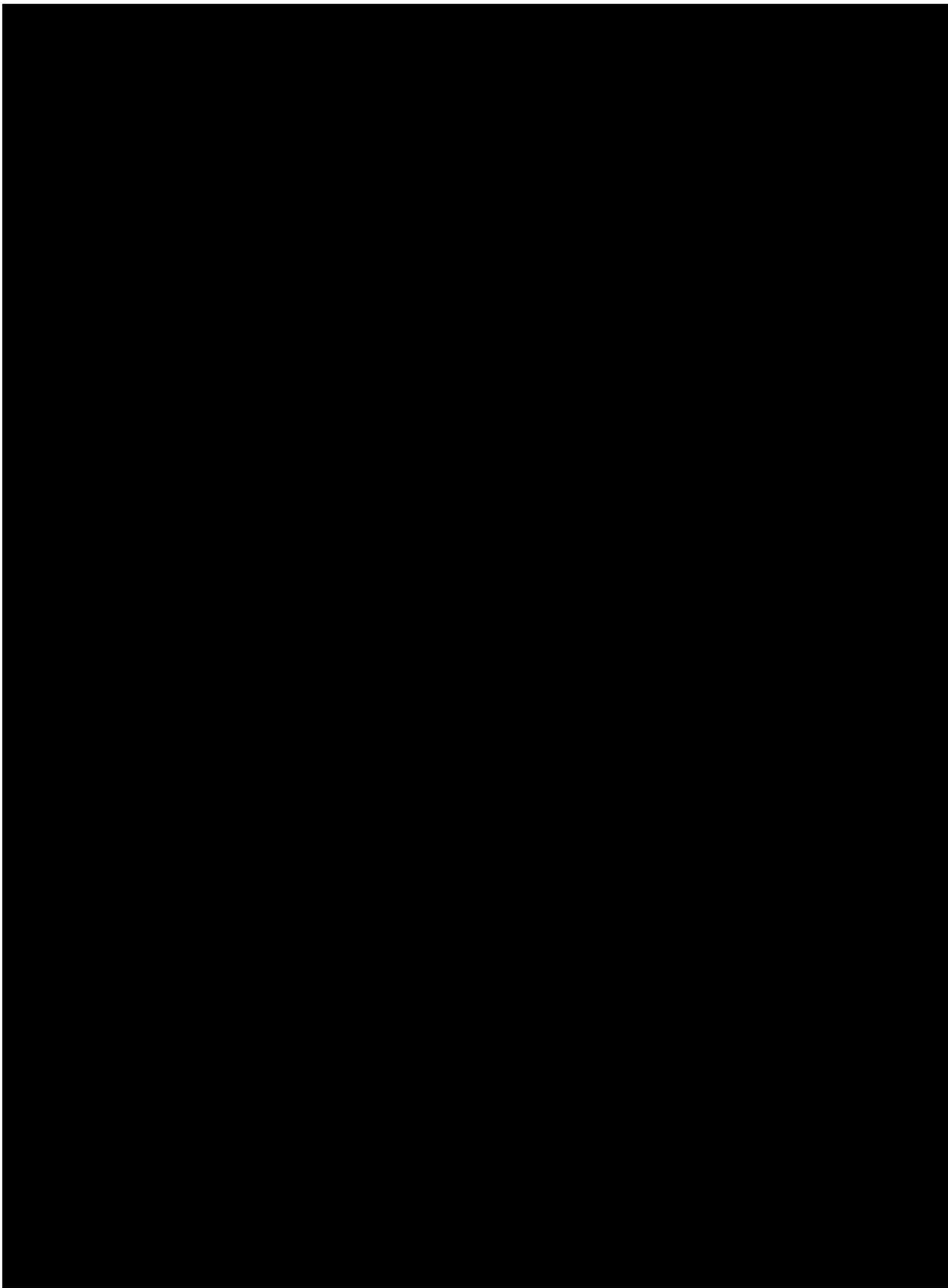


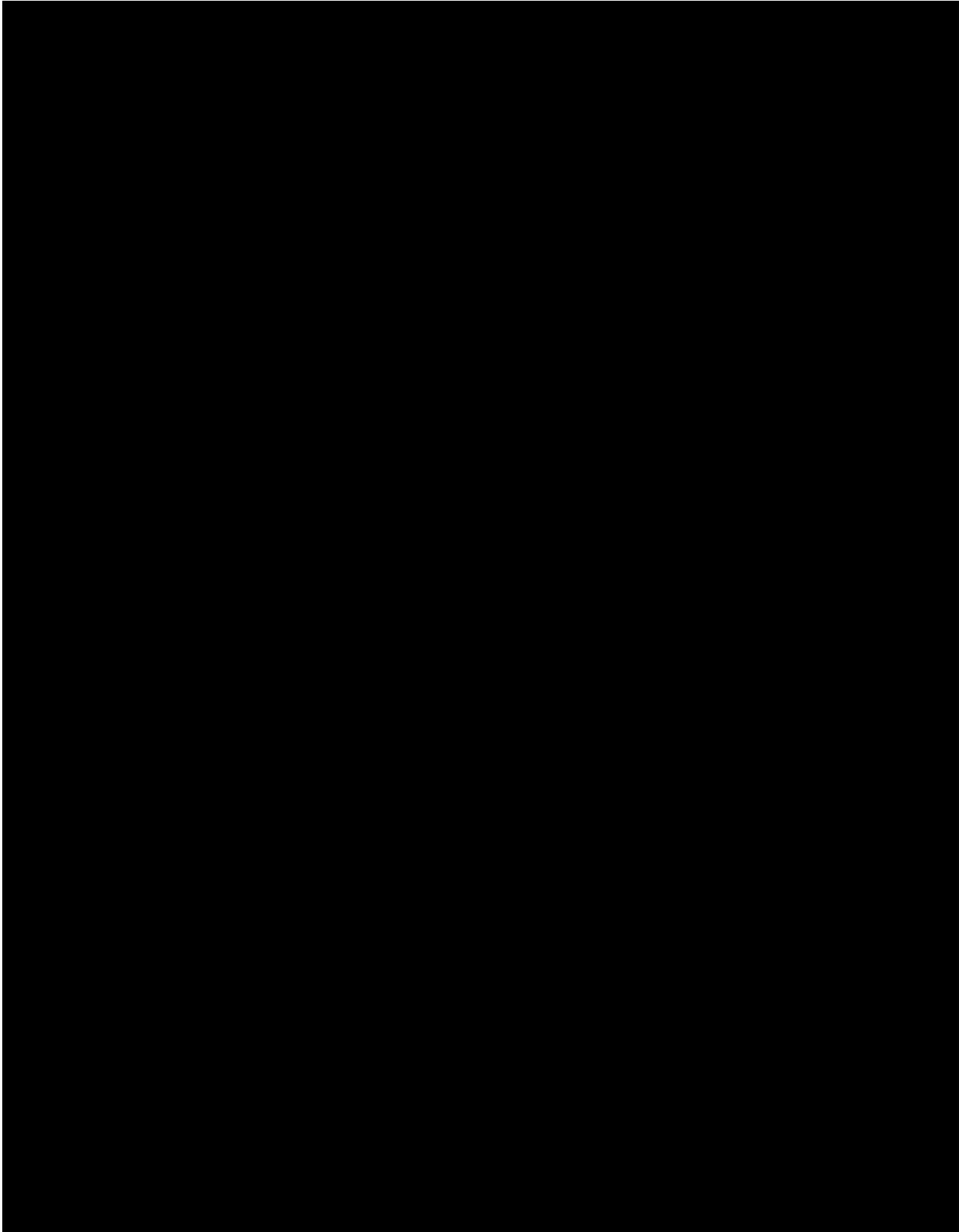


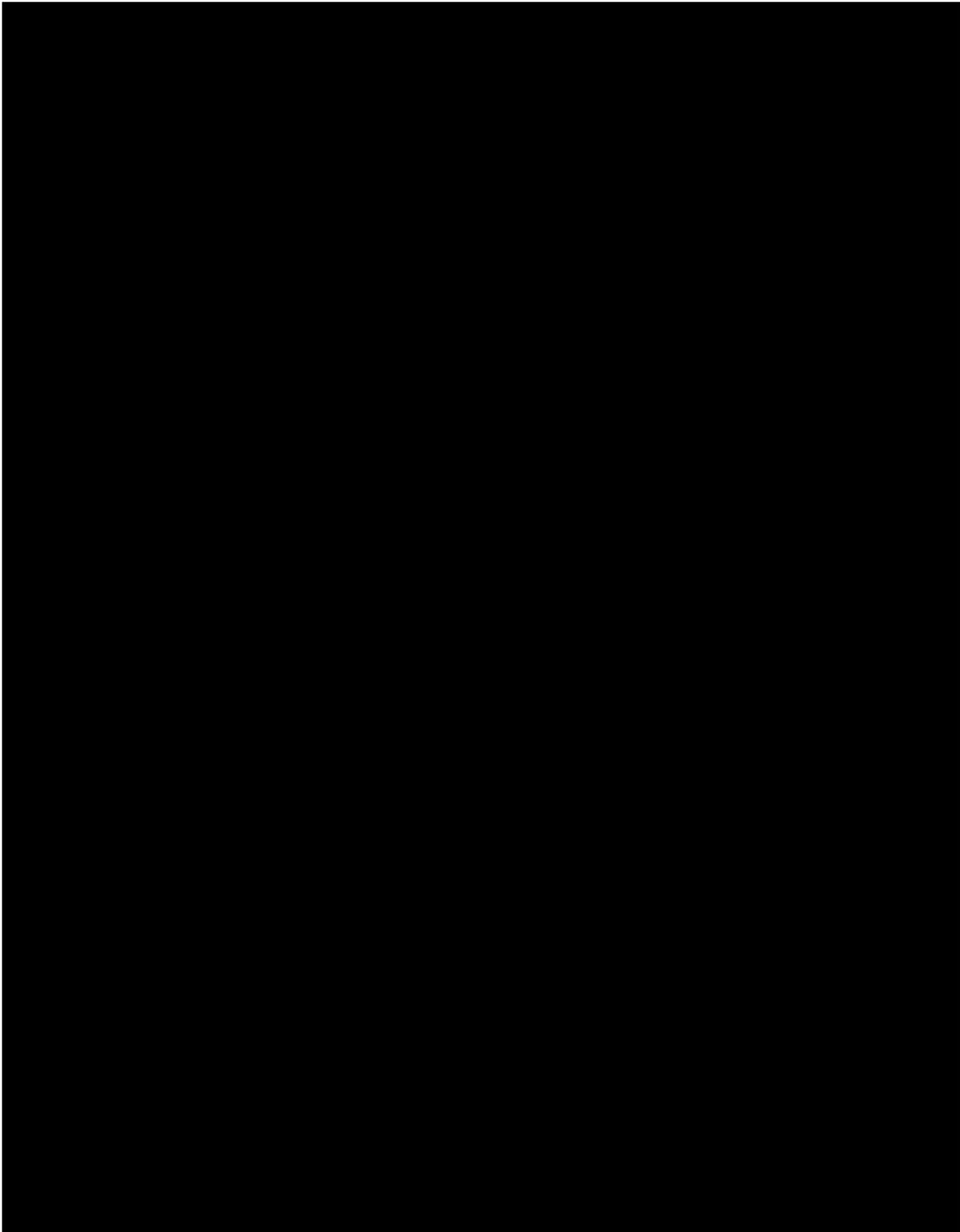


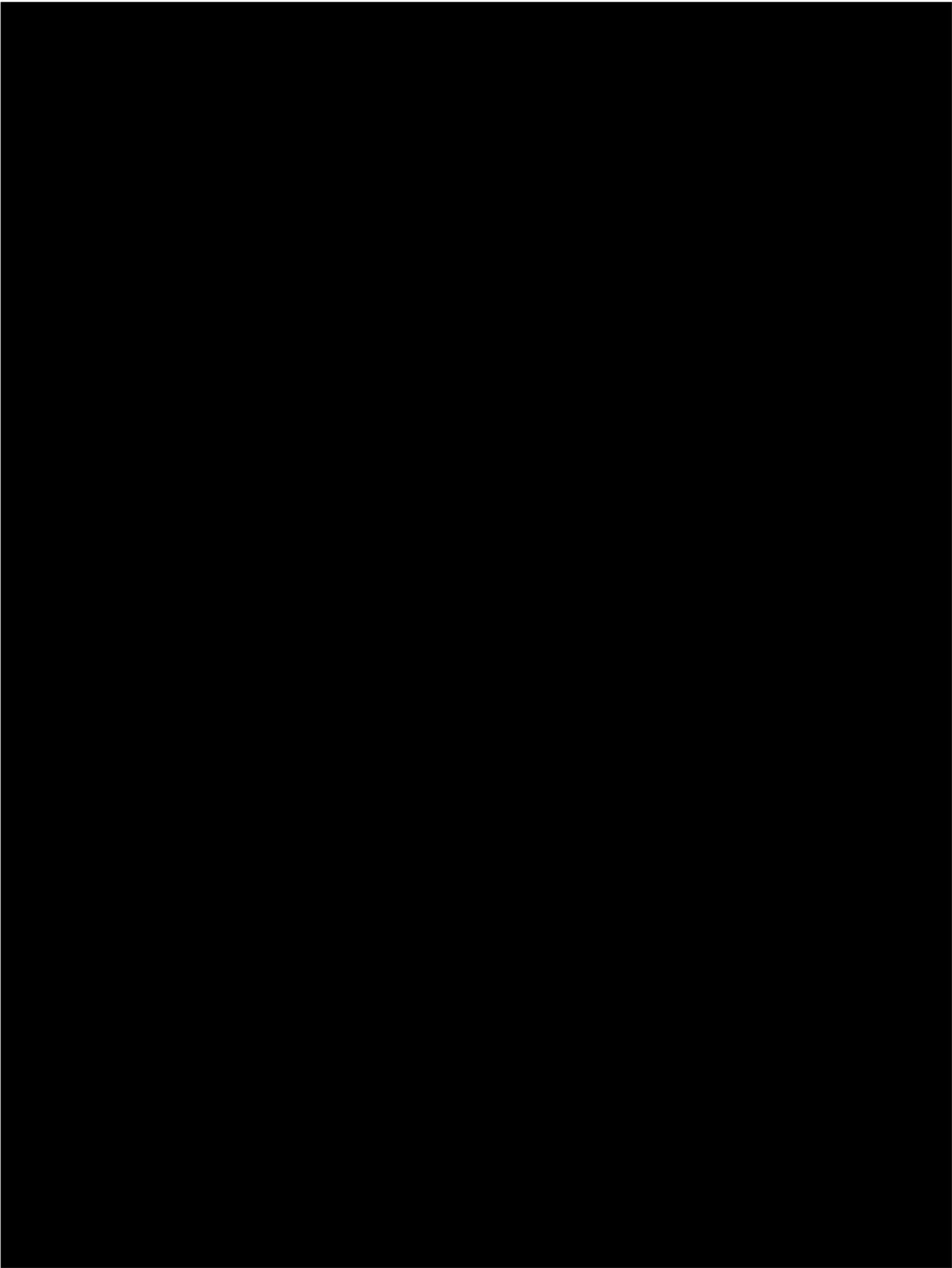


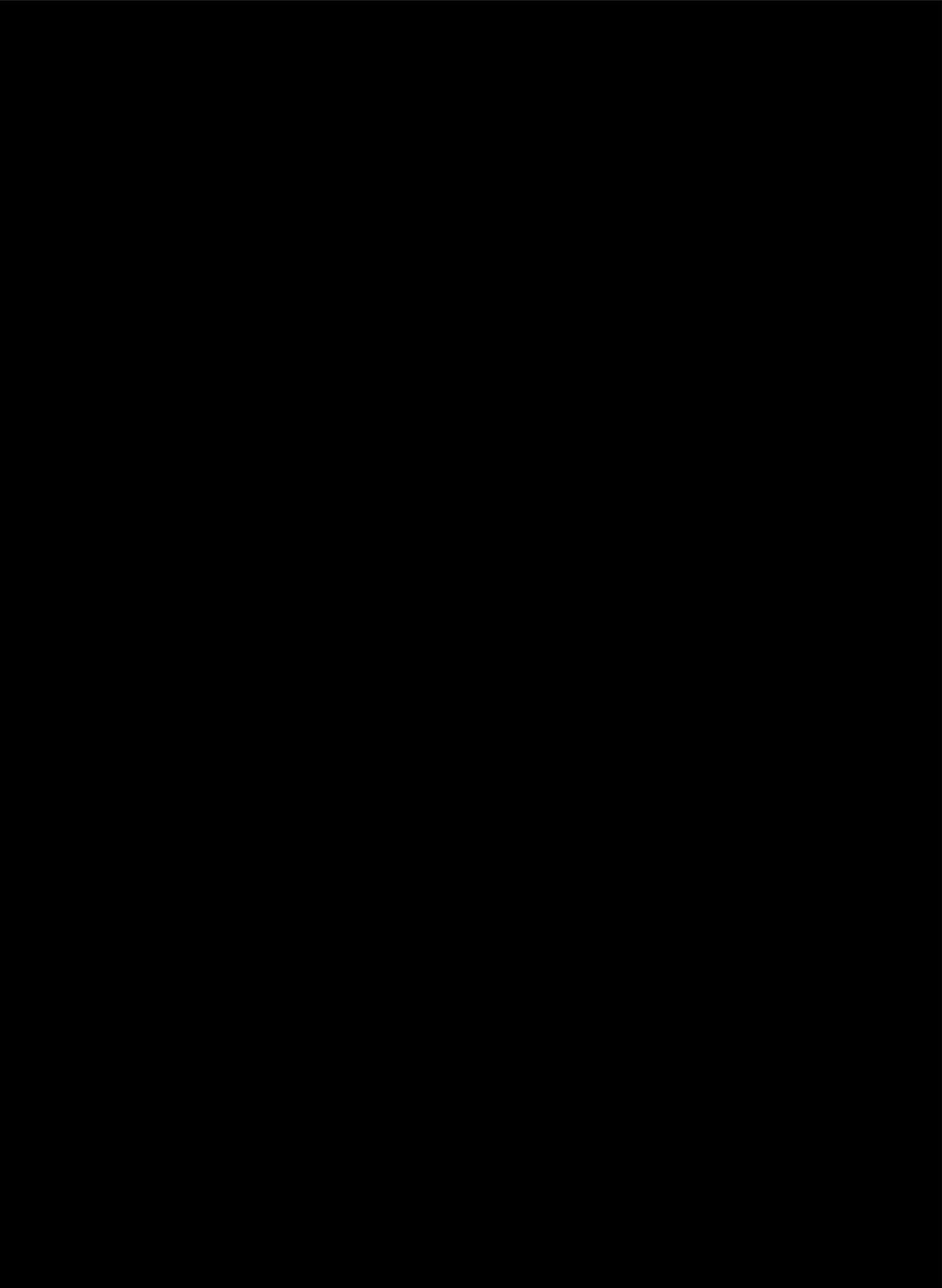


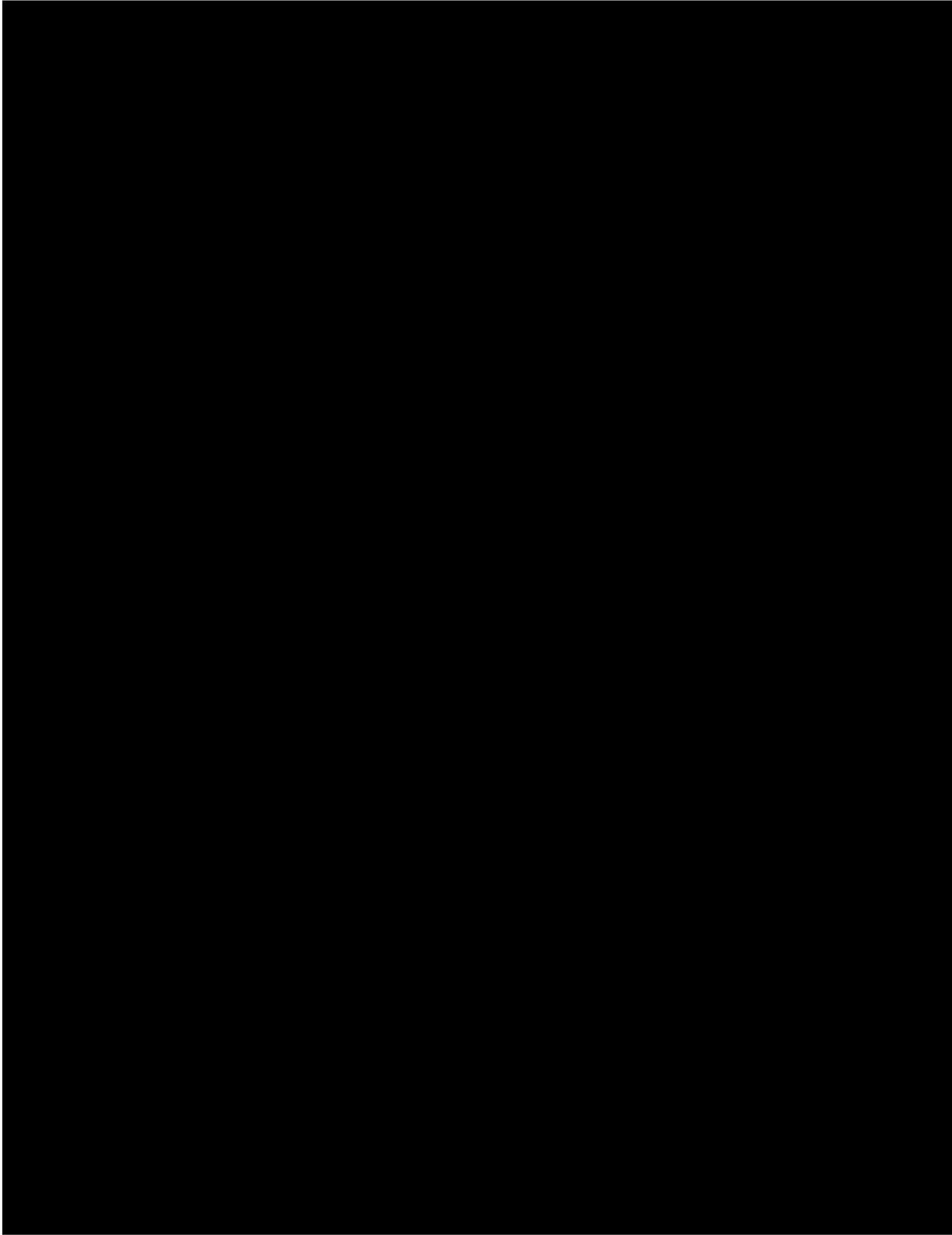


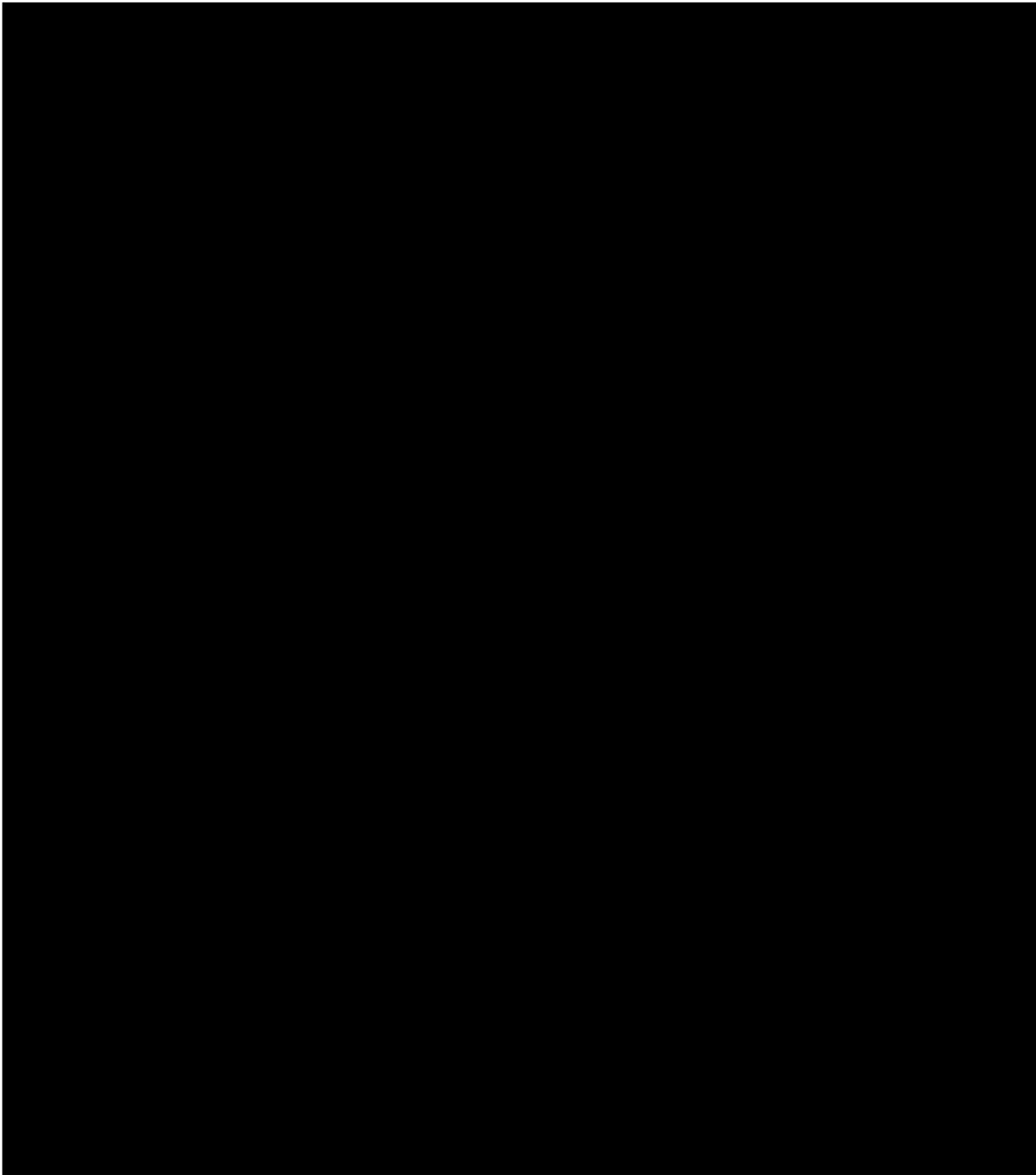


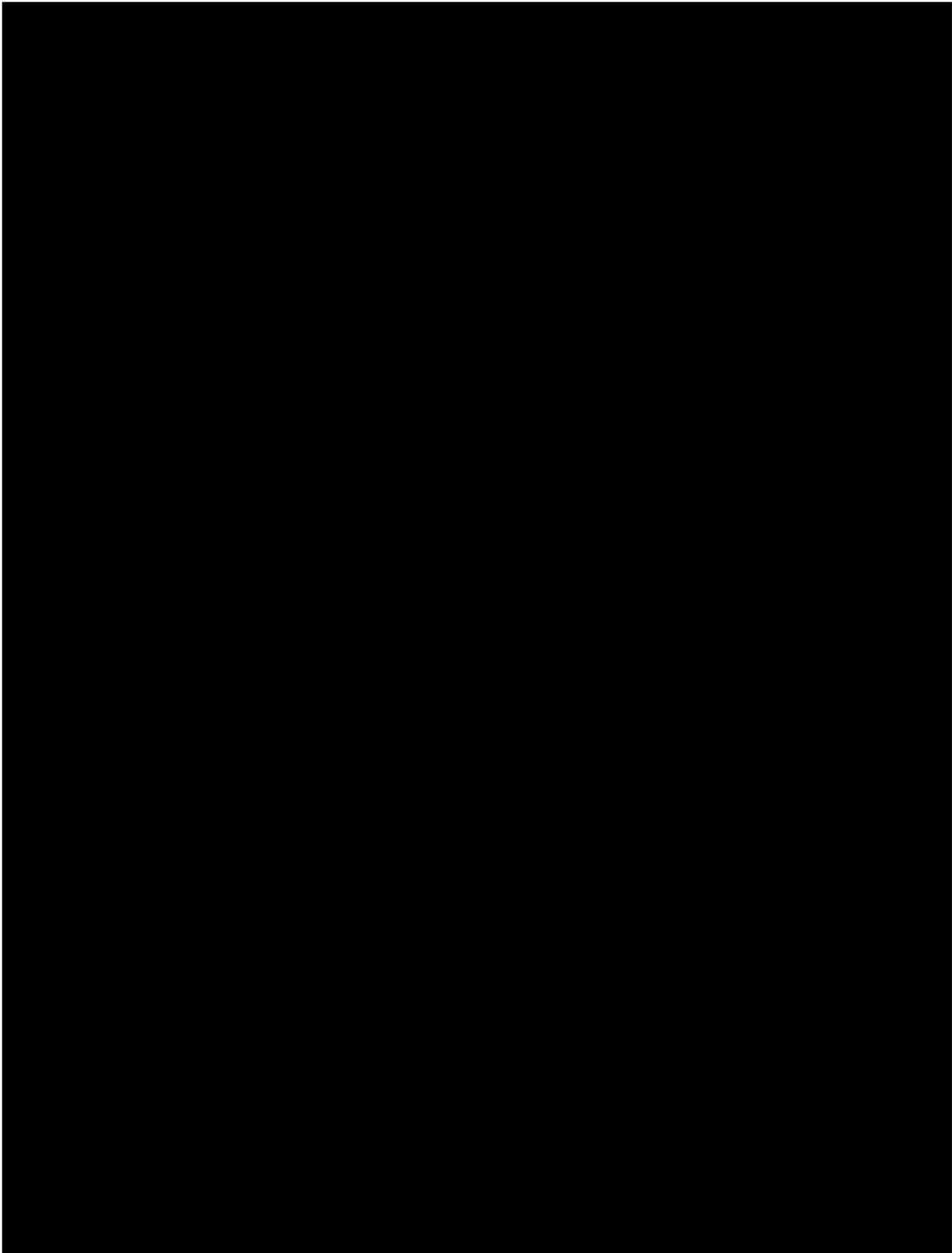


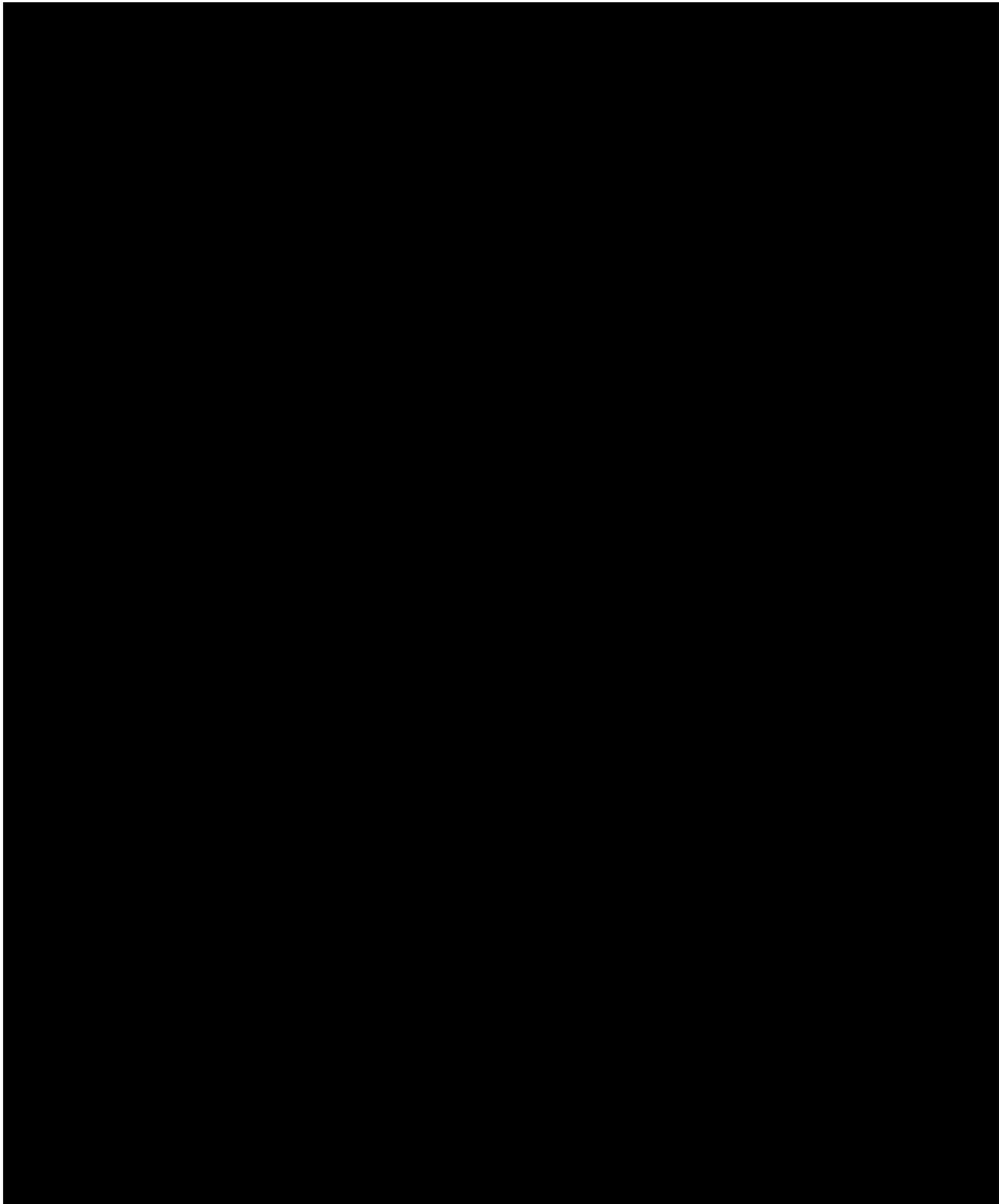


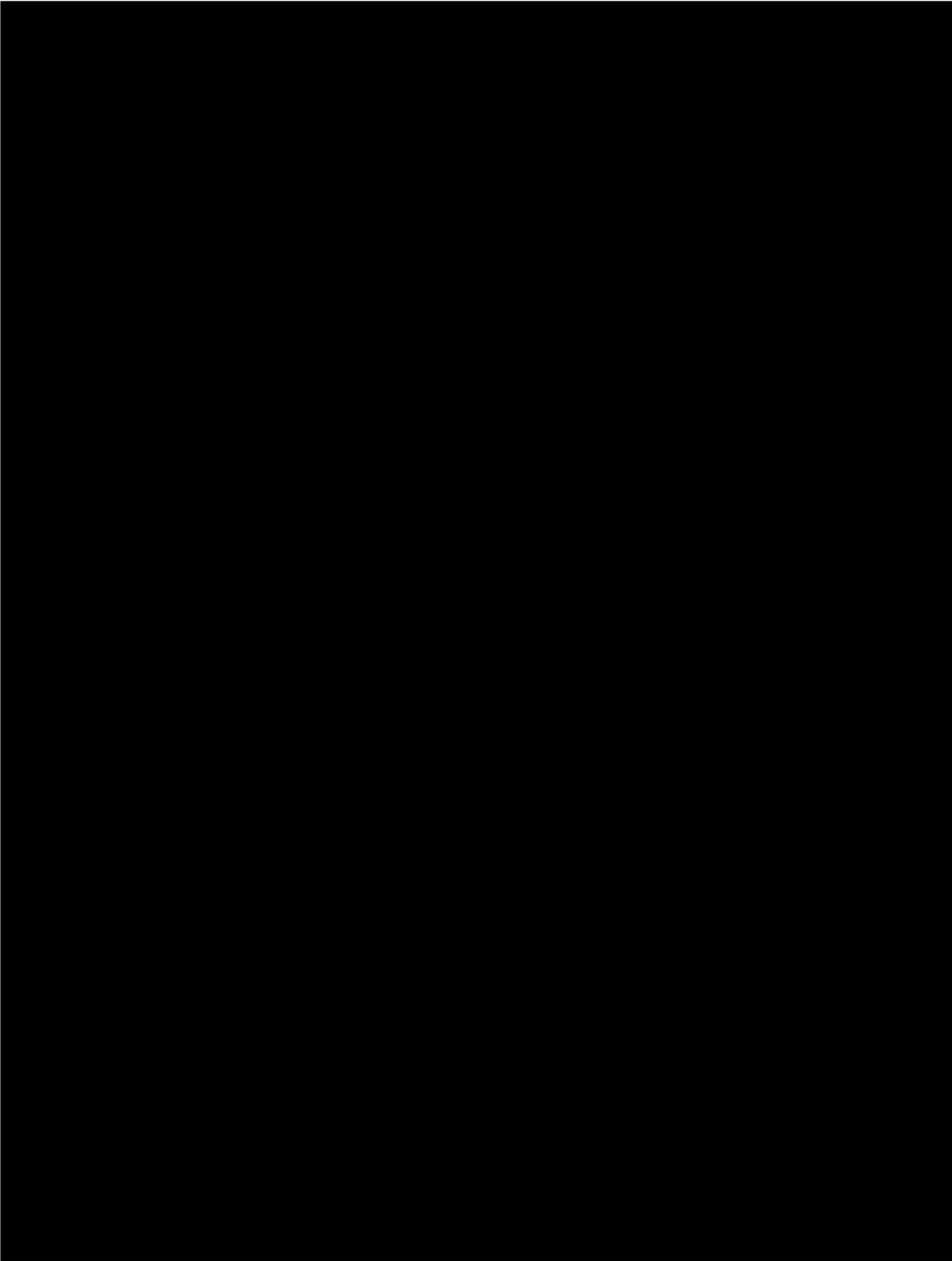


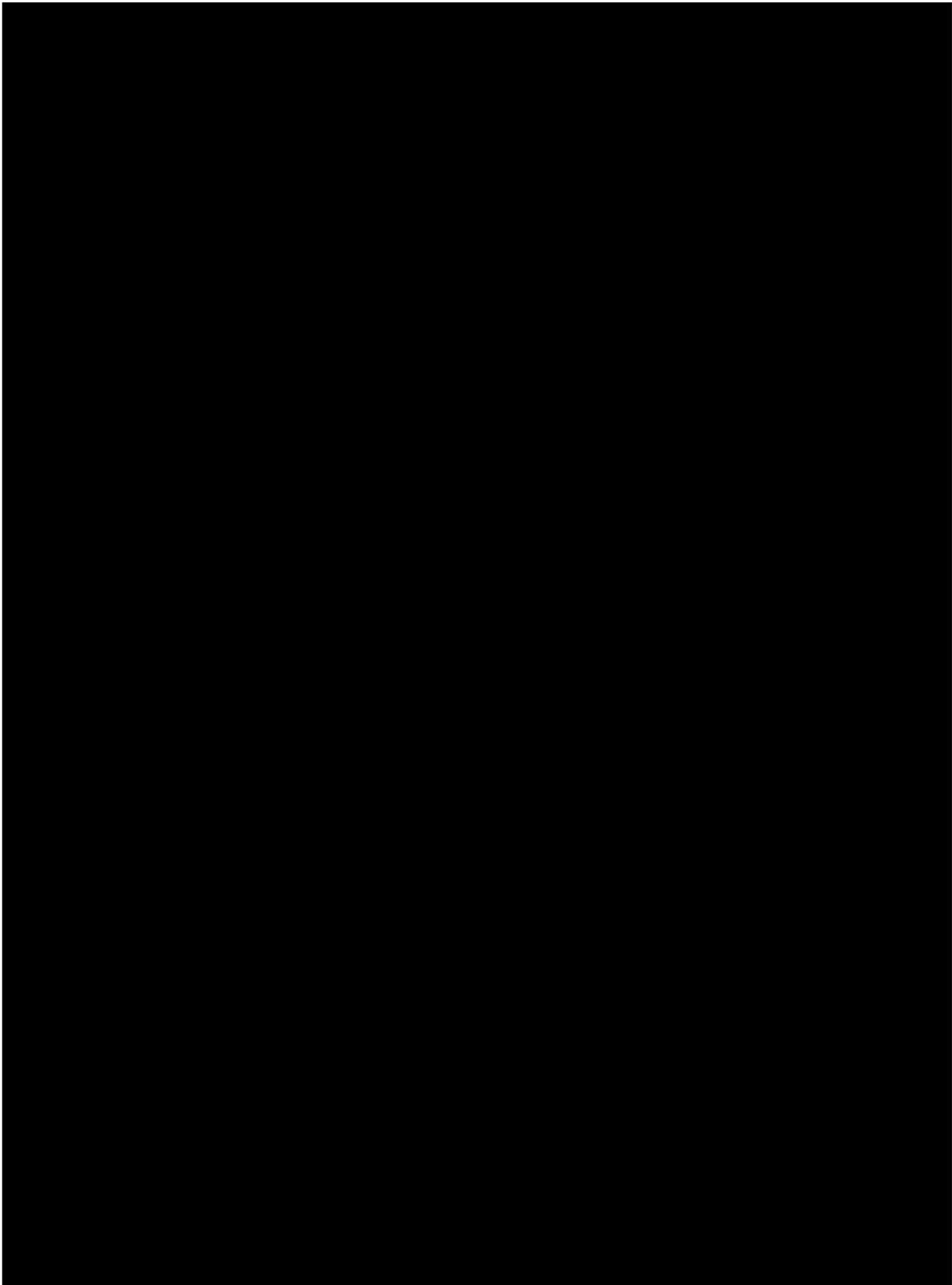


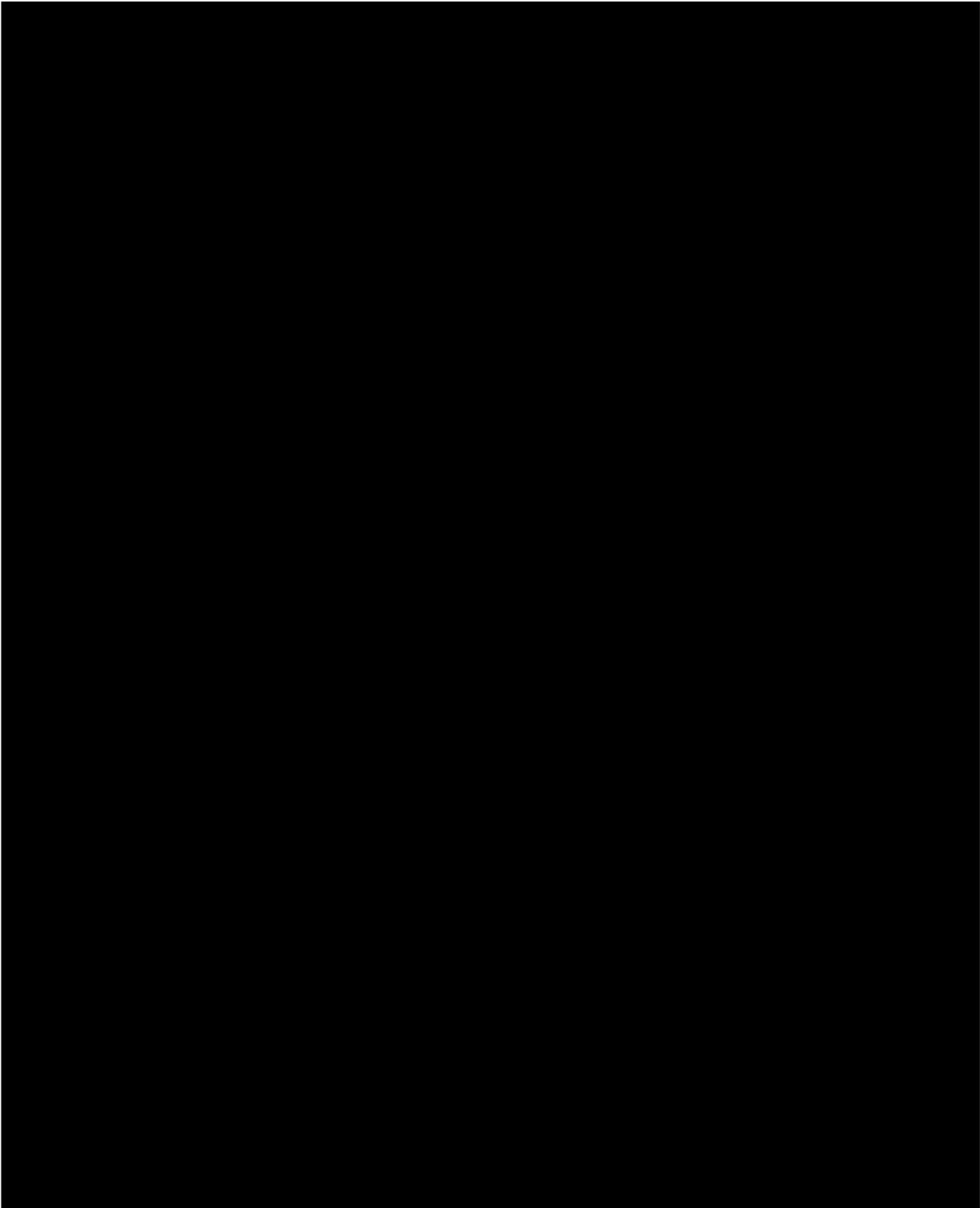












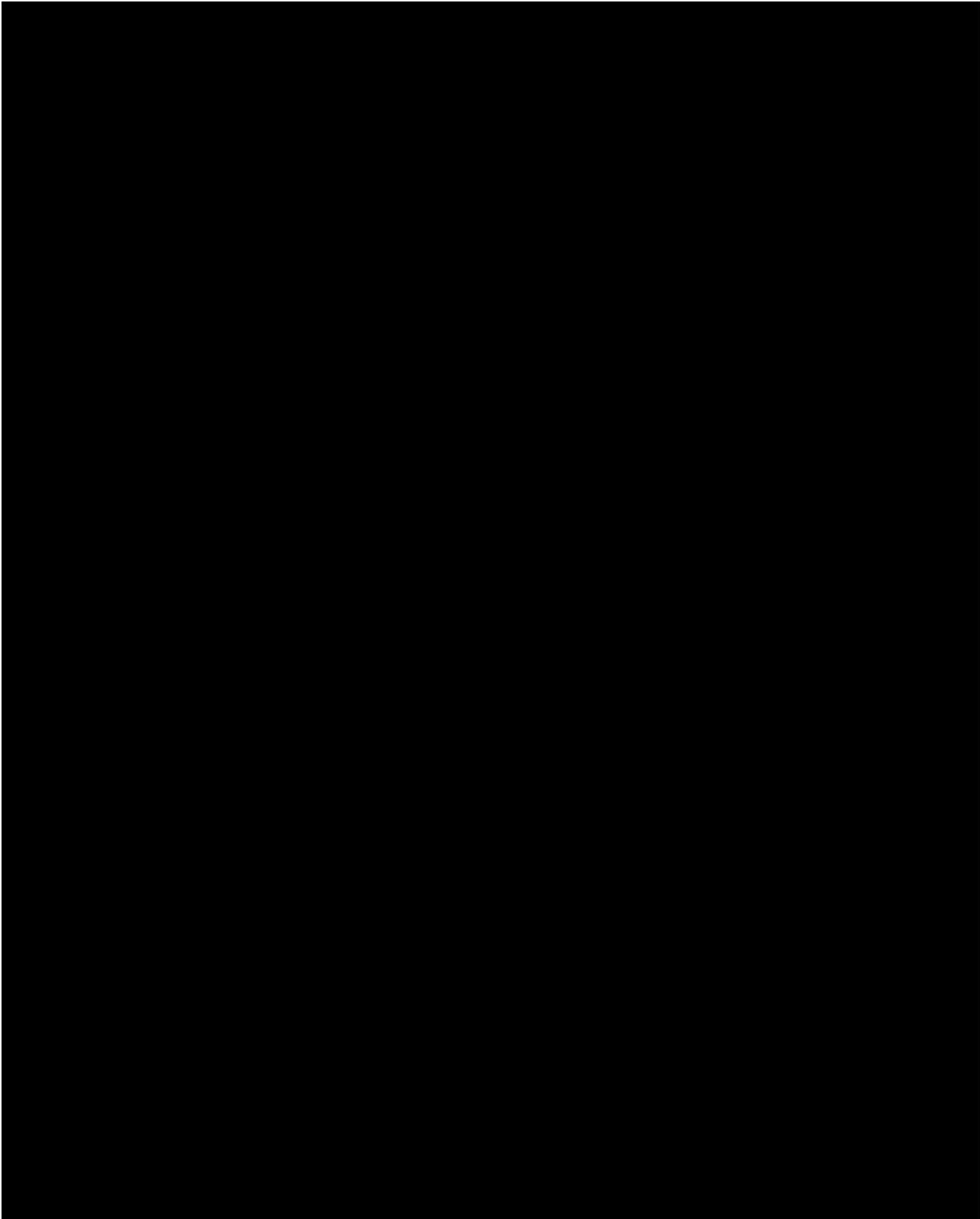




EXHIBIT 13

Message

From: Individual 2 [REDACTED]
Sent: 11/1/2021 5:27:48 AM
To: Edwin Cherfilus [REDACTED]@gmail.com]
CC: Sheila Cherfilus McCormick [REDACTED]@hotmail.com]
Subject: Haitian Media Outreach Booster
Attachments: Haitian Media Team Schedule for SCM.xlsx; NHAEON Final Haitian GOTV Plan .xlsx

Everything confirmed except this 900 AM in Palm Beach-Evard Saint Armand-ill get his info in the AM...

Best,

Individual 2 [REDACTED]

Saturday, October 30, 2021					Pastor Metellus and Dantinor these are NHAEON Members who available to speak if needed						
Show Name	Time Frame	Responsible Spokesperson	Time for Spokeperson	Call-In Number	First Name	Last Name	Official Title	State	Cell Phone:	Status:	
Henri claudé	4-6 AM	Done			Individual 2		Mayor	Florida		spoke	
Antoine Faveur	9-12 PM						Councilman	Florida		spoke	
Michel Alisma	1-2 PM						Councilwoman	Florida		spoke	
NPP Show Entire Hour	2-3 PM						Commissioner	Florida			
Raymond Emmanuel	5-6 PM						Vice Mayor	Florida			
David Fradin	7-8 PM					Michael	Joseph	Commissioner	Florida		
Sunday, October 31, 2021							City Clerk	Florida		spoke	
Henri claudé	4-6 AM							Commissioner	Florida		
David Fradin	7-8 AM							Councilman	Florida		
Nerette V Show	8-9 AM							Councilwoman	Rhode Island		spoke
Thony Jean Thenor	12-1 PM						Councilwoman	New Jersey			
Benett Show	4-5 PM						School Board Member	New Jersey			
Henri Claude	6-7 PM						School Board Member	New Jersey			
NPP Show Entire Hour	9-10 PM						School Board Member	New Jersey			
Monday, November 1, 2021							State Assemblywoman	New York			
WLBQ 1320 AM Booster	7-7 PM	Pastor Metellus/Dantinor/Baz	Throughout the day				State Assemblywoman	New York			
Radio Piman Bouk 1360 AM Booster	11-7 PM	Pastor Metellus	8:30 AM				Councilwoman	New York			
1580 AM Booster	2-2:30 PM	Pastor Metellus/Dantinor	Entire Show				State Assemblywoman	New York			
WPB Radio/ Hallan Daphnis	Varies/TBD		10:30 A.M. – 2:00 P.M. – 4:00 P.M. 6:30 P.M.				State Assemblyman	New York		spoke	
WPB Radio 990 AM Leger	Varies/TBD										
WPB Radio - 900 AM											
Info Biz Show	5:30-6:00 PM	Pastor Metellus/Dantinor	Entire Show	Studio							
Lesly Jacques Show 980 AM WPB	4:00 PM	Pastor Metellus	5 mins								
Eli Sem-Radio Piman Bouk	12:00 PM	Pastor Metellus	5 mins								
Emmanuel Show Piman Bouk	4:00 PM	Dantinor Rodin	5 mins								
Pat Santangelo	5:00 PM	Pastor Metellus	10 Mins								
Radio Mega 1700 AM Alex St. Surin	11:00-11:30 AM	Pastor Metellus/Dantinor	Entire Show								
Radio Mega 1700 AM Alex St. Surin	12:30-1:00 PM	Pastor Metellus/Dantinor	Entire Show								
Tuesday, November 2, 2021											
WLBQ 1320 AM Booster	4-6 AM	Pastor Metellus/Dantinor/Baz	Throughout the day								
Radio Piman Bouk 1360 AM Booster	11-7 PM	Pastor Metellus	8:30 AM								
1580 AM Booster	2-2:30 PM	Pastor Metellus/Dantinor	Entire Show								
WPB Radio/ Hallan Daphnis	Varies/TBD	Pastor Metellus	4:00 P.M. - 6:30 P.M.								
WPB Radio 990 AM Leger	Varies/TBD	Pastor Metellus/Dantinor		Call-in							
WPB Radio - 900 AM											
Info Biz Show	5:30-6:00 PM	Pastor Metellus/Dantinor	Entire Show	Studio							
Lesly Jacques Show 980 AM WPB	4:00 PM	Pastor Metellus	5 Mins	Call-in							
Eli Sem-Radio Piman Bouk	12:00 PM	Pastor Metellus	5 Mins	Call-in							
Pat Santangelo	5:00 PM	Pastor Metellus	10 Mins	Call-in							
Radio Mega 1700 AM Alex St. Surin	11:00-11:30 AM	Pastor Metellus/Dantinor	Entire Show	Call-in							
Radio Mega 1700 AM Alex St. Surin	12:30-1:00 PM	Pastor Metellus/Dantinor	Entire Show	Call-in							
Radio Mega 1700 AM Alex St. Surin	3:00-4:45 PM	Pastor Metellus/Dantinor	Entire Show	Studio							

Saturday, October 30, 2021						
Show Name	Time Frame	Responsible Spokesperson	Time for Spokeperson	Call In Number	Amount	
Henri claudé	4-6 AM				\$ -	
Antoine Faveur	9-12 PM				\$ 100.00	
Michel Alisma	1-2 PM				\$ 50.00	
NPP Show Entire Hour	2-3 PM				\$ 375.00	
Raymond Emmanuel	5-6 PM				\$ 200.00	
David Fradin	7-8 PM				\$ 50.00	
Sunday, October 31, 2021						
Show Name:	Time Frame				Amount	
Henri claudé	4-6 AM				\$ -	
David Fradin	7-8 AM				\$ 50.00	
Nerette V. Show	8-9 AM				\$ 100.00	
Thony Jean Thenor	12-1 PM				\$ 50.00	
Benett Show	4-5 PM				\$ 50.00	
Henri Claude	6-7 PM				\$ 50.00	
NPP Show Entire Hour	9-10 PM				\$ 190.00	
Monday, November 1, 2021						
Show Name:	Time Frame	Responsible Spokesperson	Time for Spokeperson	Call-In Number	Amount	
WLQY 1320 AM Booster	7-7 PM	Pastor Metellus/Dantinor/Baz	Throughout the day		\$ 500.00	
Radio Piman Bouk 1360 AM Booster	11-7 PM	Pastor Metellus	8:30 AM		\$ 350.00	
1580 AM Booster	2-2:30 PM	Pastor Metellus/Dantinor	Entire Show		\$ 200.00	
Radio Mega	Varies/TBD				\$ 500.00	
WPB Radio/ Hallan Daphnis	Varies/TBD		10:30 A.M. – 2:00 P.M. – 4:00 P.M. 6:30 P.M.		\$ 600.00	
WPB Radio 990 AM Leger	Varies/TBD				\$ 750.00	
WPB Radio - 900 AM					\$ 250.00	
Info Biz Show	5:30-6:00 PM	Pastor Metellus/Dantinor	Entire Show	Studio	\$ 250.00	
Lesly Jacques Show 980 AM WPB	4:00 PM	Pastor Metellus	5 mins		\$ -	Paid E.C
Eli Sem Radio Piman Bouk	12:00 PM	Pastor Metellus	5 mins		\$ 100.00	
Emmanuel Show Piman Bouk	4:00 PM	Dantinor Rodin	5 mins		\$ 100.00	
Pat Santangelo	5:00 PM	Pastor Metellus	10 Mins		\$ 100.00	
Tuesday, November 2, 2021						
Show Name:	Time Frame	Responsible Spokesperson	Time for Spokeperson	Call-In Number	Amount	
WLQY 1320 AM Booster	4-6 AM	Pastor Metellus/Dantinor/Baz	Throughout the day		\$ 500.00	
Radio Piman Bouk 1360 AM Booster	11-7 PM	Pastor Metellus	8:30 AM		\$ 350.00	
1580 AM Booster	2-2:30 PM	Pastor Metellus/Dantinor	Entire Show		\$ 200.00	
Radio Mega	Varies/TBD				\$ 500.00	
WPB Radio/ Hallan Daphnis	Varies/TBD		10:30 A.M. – 2:00 P.M. – 4:00 P.M. – 6:30 P.M.		\$ 400.00	
WPB Radio 990 AM Leger	Varies/TBD				\$ 400.00	call for details
WPB Radio - 900 AM					\$ 250.00	
Info Biz Show	5:30-6:00 PM	Pastor Metellus/Dantinor	Entire Show	Studio	\$ 250.00	
Lesly Jacques Show 980 AM WPB	4:00 PM	Pastor Metellus	5 Mins		\$ -	
Eli Sem Radio Piman Bouk	12:00 PM	Pastor Metellus	5 Mins		\$ 100.00	
Pat Santangelo	5:00 PM	Pastor Metellus	10 Mins		\$ 100.00	
Other Expenses	Justification					
Marie Loud Metellus Spokesperson: Sun-T	Official Spokesperson for Sheila via NHAEON Progressive PAC				\$ 2,500.00	
Bazile Jean-Bethol- Haitian Media Outread	Assisting with Media Buy on 1320 AM				\$ 1,000.00	
Accurate Business System (ASB) Printing	5000 Palm Cards				\$ 540.00	
Accurate Business System (ASB) Printing	4 by 8 Signs with Labor				\$ 1,000.00	
Manouco Ayiti TV Boster	TV Haitian				\$ 1,500.00	
ABS Printing New Cards	5000 Palm Cards				\$ 540.00	
Poll Workers : Debra Herring & Friend	Early Voting	Miramar Library			\$ 520.00	
Dantinor Co-Host with Metellus	Various Stations Speaking on behalf of NHAEON for Sheila				\$ 750.00	
APC Solutions	Accounting Services	September to November	Aland Pierre Canel		\$ 500.00	
E Day Coordination	7:00 AM to 7:00 PM	E Day Coordination				
OVERALL TOTAL					\$ 16,865.00	

EXHIBIT 14

Message

From: Individual 2 [REDACTED]
Sent: 12/20/2021 7:07:28 PM
To: Edwin Cherfilus [REDACTED]@gmail.com]
CC: Sheila Cherfilus McCormick [REDACTED]@hotmail.com]
Subject: Sorry Edwin
Attachments: Expenses .xlsx

Hi Edwin,

You are correct I sent you the actual Radio Recommended Budget which I thought I shared with you last week. Attached is the actual budget.

Best,

Individual 2 [REDACTED]

January 11,2022 General Election Expenses

Haitian Radio/Outreach

Line Items	Event Name	Budget	Notes
Hotel Accomodations	Event # 2	\$ 4,000.00	Hotel Rooms for two nights: 1 Suite @ \$1,300 Plus 3 regular rooms @\$900 per room
Entertainment	Event # 2	\$ 9,000.00	50% Deposit of the total amount \$18,000
Catering & Beverage Deposit	Event # 2	\$ -	TBD
Spy Museum	Event # 2	\$ 15,000.00	Full Amount must be paid
Total Line Items		\$ 28,000.00	

Wiring information for NHAEON:

[Redacted]

Routing number:

[Redacted]

January 11,2022 General Election Expenses

Haitian Radio/Outreach

Line Items	Budget	Notes
Haitian Television	\$ 4,000.00	
Haitian Radios	\$ 24,500.00	Campaign
Productions	\$ 6,500.00	
Joe Eggellesson	\$ 5,000.00	
Daryl Campbell	\$ 5,000.00	
Jervonte 'Tae' Edmonds	\$ 5,000.00	
Total Expense	\$ 50,000.00	

EXHIBIT 15

Message

From: Individual 2 [REDACTED]
Sent: 7/22/2022 6:35:17 PM
To: Edwin Cherfilus [REDACTED]@gmail.com]
Subject: This the Revised one
Attachments: Revised HA PAC for Sheila McCormick Buy 22.xlsx

We can briefly discuss this one-

Best,

Individual 2 [REDACTED]

					Responsible Party	Date Started
South Florida Haitian Media Proposal						
Region: South Florida Market (District 20, Broward, Palm Beach)						
Radio Station:	Show Name:	Host:	Time/Day:	TOTAL Recommend Amount		
Haitian Television						
Island TV	6/hr station formerly 24 hrs	Varies	Prime Time	\$ 6,000.00	Individual 2	7/10/2022
AYITI TV	24 Hrs/Various Market	Varies	Varies /Has listing of shows	\$ -		
Telemaster TV	24 Hrs/Various Market	Varies	Varies /Has listing of shows	\$ -		
Anacarana TV	24 Hrs/Various Market	Varies	Varies /Has listing of shows	\$ -		
Tropical TV	24 Hrs/Various Market	Varis	Varies /Has listing of shows	\$ -		
WLQY 1320 AM Radio						
WLQY 1320 AM	Tout Moun Jwen	Michel Alisma	7-8 AM M-F	\$ 600.00		7/4/2022
WLQY 1320 AM	COIN Tax	Eddy Durandis	8-9 AM M-F	\$ 600.00		7/4/2022
WLQY 1320 AM	Mosaic Info	Pierre Nazon Bolrier	9-10 AM M-F	\$ 600.00		7/4/2022
WLQY 1320 AM	Music Depot	Bazile Jean Bethol	11-12 PM M-F	\$ 750.00		7/4/2022
WLQY 1320 AM	Doux Tropic Show	Alix Jean-Jacques (Tilou)	12-1:00 PM M-F	\$ 1,500.00		7/4/2022
WLQY 1320 AM	Anderson Show	Rotchil Anderson	2:30-3:00 M-F	\$ 600.00		7/4/2022
WLQY 1320 AM	Radio Compa	Aubry Blague	7-8 PM M-F	\$ 500.00		7/4/2022
WLQY 1320 AM	Info Biz	Frantz Laurent	4-6 pm M-F	\$ 1,000.00		7/4/2022
WLQY 1320 AM	Anteinne Independence	Jean Antoine Favor	9-12 PM Saturdays	\$ 300.00		7/4/2022
WLQY 1320 AM	Jean Gary Fabien	Galaxy International	Tues, Thurs & Fri Evening	\$ 300.00		7/4/2022
WLQY 1320 AM	Radio Veye Yo	Tony Jean-Tenor	12:00-1:00 PM Sundays	\$ 300.00		7/4/2022
WLQY 1320 AM	Buyers Car Info	Herold Degaraff	Varies	\$ 1,500.00		7/4/2022
WLQY 1320 AM	Radio	Marielourdes Metellus		\$ 750.00		7/4/2022
WLQY 1320 AM	GM Miami (Chien Chien)	Maxime Silien	Various Stations	\$ 400.00		7/4/2022
WLQY 1320 AM	Radio Pitit Kay (Immigration)	Raymond Emmanuel	Saturday 5-6 PM	\$ 500.00		7/4/2022
WLQY 1320 AM	Radio 1320	Henry Claude Dufrene	Varies	\$ 1,500.00		7/4/2022
WRHII 980 AM-103.1 FM						
WRHII 980 AM	WRHII 980 AM	Lesly Jacques	24 Hhrs Various	\$ 2,000.00	Individual 2	7/21/2022
WSRF 1580 AM Radio						
WSRF 1580 AM	Koze Famn	Guylene Berry	Various Stations	\$ 800.00		7/21/2022
WSRF 1580 AM	Radio Station (Flat Rate)	Rose Coriolan	Varies /Has listing of shows	\$ 2,000.00	Individual 2	7/4/2022
1260 AM Christian Radio Station						
Radio Christian	Simonville Show	Andre Simonville		\$ 300.00		7/21/2022
Haitian Christian Radio	Radio	Pastor Iton/Ernst Derizer	Christian Station	\$ 750.00		7/21/2022
WQVN 1360 AM Radio						
WQVN 1360 AM	Radio Station	Nelson Voltaire (Piman Bouk)	7-11 AM M-F	\$ 3,000.00	Individual 2	7/4/2022
WQVN 1360 AM	Radio	Pierre Eli Siem		\$ 600.00		7/4/2022
WQVN 1360 AM	Radio	William Jean Louis (Pouchon)		\$ 600.00		7/4/2022
WQVN 1360 AM	Radio	Jocelyn Simeon	Weekly 2PM	\$ 300.00		7/21/2022
Radio Mega Radio						
WJCC 1700 AM	Various Shows	Marie Carmelle St. Surin	Various Stations	\$ 2,000.00	Individual 2	7/4/2022
Radio Mega 1700 AM	Taxi Cab Voice	Raymand Francois	Saturdays 7-8 AM	\$ 750.00		7/21/2022
Radio Mega 1700 AM	La Voix de Constituent	Gerard Raphael	Mon-Fri 9-10 PM	\$ 500.00		7/21/2022
Other Outreach with in the District						
Belle Glades Radio	Belle Glades-From WPB Carrier	Hallan Daphnis	24 Hhrs Various	\$ -		
WFWN 900 AM	Radio Nouvelle Vision	John Forest	Varies 24 hrs	\$ 500.00		7/4/2022
West Palm Beach Station	West Palm Beach Station	Hallan Daphnis	Various Stations	\$ 1,000.00		7/4/2022
West Palm Beach Station	Pastor of Associations	President of the Haitian Pastors	Varies /Has listing of shows	\$ 1,000.00	Individual 2	7/22/2022
West Palm Beach Station	Radio Tempo Inter 1600 AM	Varies	24 hrs Station	\$ 500.00		7/4/2022
West Palm Beach Station	Radio Lumiere 87.9 FM	Halland Daphnis	24 hrs Station	\$ 500.00		7/4/2022
Immokalee	Radio in Immokalee	NO Radio get coverage from PB	24 Hhrs Various	\$ -		
Productions/Administrative Services						
Distribution Coordinator	Alix Jean Jacques	All Stations		\$ 1,250.00		
Checks Order	BankUnited	BankUnited		\$ 100.00		
Schedule Coordinator	Dantiner Rodin	All Stations		\$ 500.00		
Accounting Services	Benson Charles	PAC Accountant/Compliance		\$ 1,500.00		
Haitian VOTES PAC Logo	Patricia Laurenceau	Laurenceau Design Studio		\$ 375.00		
Invite for SCM	Erica Crawford	Invite for NYC Event		\$ 100.00		
Website	Website	havotes.org		\$ 375.00		
Ad Translation/Production	Christoph Simeon	Produce 1st Ad		\$ 1,000.00		
TOTAL				\$ 40,000.00		

EXHIBIT 16

Message

From: Individual 2 [REDACTED]
Sent: 8/5/2022 1:43:11 AM
To: Edwin Cherfilus [REDACTED]@gmail.com]
Subject: Fwd: Invoice Campaign Sheila C. McCormick
Attachments: image001.png; image001.png; Imaginart_SCM001_Invoice Campaign Sheila Cherfilus McCormick.pdf

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: August 4, 2022 at 9:16:29 PM EDT
To: Individual 2 <[REDACTED]>
Subject: Invoice Campaign Sheila C. McCormick

Hi [REDACTED]

Attached, is the invoice for Sheila's Campaign. Let me know when we can expect the check or wire.

Thank you!

[REDACTED]

[REDACTED] | www.islandtv.tv
[REDACTED] | Office: 1 (888) 816-7174 | Fax: (305) 675-3947

From: Individual 2 [REDACTED]
Sent: Tuesday, July 26, 2022 7:19 PM
To: [REDACTED]
Subject: Re: Please produce Ad to be Air ASAP!

5K-this is directly from her campaign!

From: [REDACTED]
Sent: Tuesday, July 26, 2022 5:53 PM
To: Individual 2 [REDACTED]
Subject: RE: Please produce Ad to be Air ASAP!

Hi [REDACTED]

Yes, she was at the station yesterday and told me that she would put some ad too; but what is the budget?

ISC016602

[REDACTED]

[REDACTED] | www.islandtv.tv
[REDACTED] | Office: 1 (888) 816-7174 | Fax: (305) 675-3947

From: Individual 2 <[REDACTED]>
Sent: Tuesday, July 26, 2022 3:07 PM
To: [REDACTED]
Subject: Please produce Ad to be Air ASAP!

Hi [REDACTED],

Please produce this ad and start running it as soon as you can-this is from her campaign, we are running late but please do your best as always-Love you--

thanks!

Best,

Individual 2

[REDACTED]

Island[®]

Island[®]





DATE: 7/27/2022

INVOICE #SCM01

Island TV Advertising

BILL TO
Campaign to re-elect Sheila C. McCor.
 c/o **Individual 2**
 [REDACTED]

ADVERTISING INFORMATION
Bill Period: Aug 2nd to August 23rd 2022
Due Date: Upon Invoice Receipt
Details: TV Spot Production +
 Island TV Advertising

ADVERTISING			
QTY	DESCRIPTION	UNIT	SUBTOTAL
30	30-second TV spots on Island TV, to promote ad: "Thank you to Congresswoman Sheila Cherfilus-McCormick".	\$ 150.00	\$ 5,000.00
1	Production of a 30-second video spot.		

Subtotal \$ 5,000.00
Total Due: \$ 5,000.00
Bill Due Date: Upon Receipt

COMMENTS
ADDED-VALUE:
 - 30 bonus TV spots on Island TV.
 - Discount on the Production spot.

PAYMENT METHODS
Check Made out to Imaginart Media Productions Mailed to PO Box 278042, Miramar, FL 33027
Zelle Sent to Imaginart Media Productions: info@imaginartmedia.com
Credit Card Call 305.303.0415 or email info@imaginartmedia.com An additional 3% fee applies
Bank / Wire Transfer Bank: Bank of America (6300 Stirling Rd, Davie, FL 33314) Account Owner: Imaginart Media Productions Account Routing #: [REDACTED] Account Number #: [REDACTED]

Thank you for your business!

For questions, contact:
 [REDACTED]

ISC016606

EXHIBIT 17

Message

From: Individual 1 [REDACTED]@gmail.com]
Sent: 5/3/2022 5:07:59 PM
To: Edwin Cherfilus [REDACTED]@gmail.com]
Subject: FEC
Attachments: FEC RFI and Fine Responses (1).docx; Hector Roos - Invoice 00282 (McCormick) (1).docx; Reponse Disputing AF 4586 (C00677492) (1).pdf

Notes regarding hector

Sheila Cherfilus-McCormick for Congress, Inc.

Report of Federal Election Commission Filings

Dated 4/12/2022

Overview:

A series of campaign finance filings were entered for the campaign with responses from the FEC RFI Letters asking for either clarification or corrections. Many of the erroneous entries mentioned had to do with how entries related to contributions made through ActBlue were designated. *These and other similar issues mentioned are easily corrected by amendment.* FEC staff has been notified of an amendment coming. Prior to filing these expectant amendments, an internal audit was completed indicating duplicate entries for loan amounts. This in itself was not a problem with the FEC. However, these duplicate entries during a 48-hour period set off a fine process which is also remedied by response and an eventual amendment.

Discussion and Responses to FEC RFI Letters:

Date: April 30, 2021

RFI: REFERENCE: APRIL QUARTERLY REPORT (01/01/2021 - 03/31/2021)

Notes:

1) Failure to file.

Response: Nothing to report. A no-activity response was filed. Nothing else was file.

Date: August 1, 2021

REFERENCE: JULY QUARTERLY REPORT (04/01/2021 - 06/30/2021)

Notes:

1&2&7. Mislabeled Conduit and Corporate

Response: The use of Numero CRM as a conduit is improper. It is not registered with the FEC as a conduit PAC. The correction is to treat Numero CRM as a payment processor like PayPal and file transaction fees as expenses; then treat the donations as a direct contributions instead of by memo or conduit.

3. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

Response: The contributions were meant to be segregated between primary and general election.

4. Schedule A (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America.

Response: US national living abroad had their passport information was collected through ActBlue to confirm their ability to make a legal contribution.

5. Your report fails to provide proper election designations for loans disclosed on Schedule A supporting Line 13(a).

Response: Amend election designation on loans.

Date: October 31, 2021

REFERENCE: 12 DAY PRE-SPECIAL REPORT (07/01/2021 - 10/13/2021)

Notes:

1. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

Response: This was duplicate submission for a **Respondent's Sister** check.

2. Your report fails to provide proper election designations for contributions disclosed on Schedule A supporting Line 11(a).

Response: We will amend the report to clarify election designations "O2022, S". What should be the proper election designation? O2022, special primary or special general

3. Schedule B of your report discloses memo entries for in-kind contributions from the candidate to your committee.

Response: These were Facebook ad expenditures but missing the in-kind contributions for it. We will amend our report to itemize the in-kind contributions from the candidate on Schedules A and B.

4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following descriptions: "Consulting," "Consulting Fee," "Donation," and "Political Consulting."

Response: Will amend the description for disbursement.

5. Schedule A of your report discloses contributions earmarked through a conduit. However, your report does not clearly disclose which conduit memo entry corresponds to each earmarked contribution.

Response: We believe this was an error. We will review each contribution entered to determine what conduit memo entry is missing. Then amend accordingly.

Date: January 9, 2022

RFI: REFERENCE: 12 DAY PRE-SPECIAL REPORT (10/14/2021 - 12/22/2021)

Notes:

1. Your report fails to provide proper election designations for contributions disclosed on Schedule A supporting Lines 11(a)(i) and 13(a).

Response: We will amend the report to clarify election designations "O2022, S". What should be the proper election designation? O2022, special general

2. Schedule B of your report discloses memo entries for in-kind contributions from the candidate to your committee.

Response: These were Facebook ad expenditures but missing the in-kind contributions for it. We will amend our report to itemize the in-kind contributions from the candidate on Schedules A and B.

3. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions.

Response: These were related to late ActBlue contributions of \$1,000 or more that were reported on the day the contribution was made. Instead, we will amend the report to indicate when the funds were made available to the campaign (since the campaign relied on the deposit of paper checks).

4. Your committee filed 48-hour notices reporting the following "last minute" contributions (see attached). However, these contributions do not appear on Schedule A of this report.

Response: Which records are these? What happens if these checks were not reported because the funds were not received into the campaign account with in that time frame of the report? *This is referring to the activity of the in-kind contributions from candidate to campaign (for Facebook ad). Include a narrative statement describing this fix. And it was also not required to file Form 6 notices regardless because these were not single transactions over \$1,000.*

5. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following descriptions: "Collateral," "Consulting," "Donation," "Political Consulting," and "Step and Repeat."

Response: Will amend the description for disbursement.

6. Schedule B of your report discloses disbursements to "Future Adventures," "JETBLUE," "Miami Kitchen Kreations," and "Our City Media" for "Wages." Please be advised that when itemizing disbursements to companies for payroll services, if the payment to the salary recipient aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the individual receiving the salary, as well as the date, amount, and purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required.

Response: Please clarify. Is it new to keep such close records of staffing pay through payroll companies? What separates an employee of a contractor and a payroll company?

7. Schedule C of your report discloses loans from the candidate where the aggregate amount outstanding in excess of \$250,000.00 was not repaid within 20 days after the special primary election.

Response: No comment at this time.

8. Schedule A of your report discloses contributions earmarked through a conduit. However, your report does not clearly disclose which conduit memo entry corresponds to each earmarked contribution.

Response: We believe this was an error. We will review each contribution entered to determine what conduit memo entry is missing. Then amend accordingly.

From Email dated March 29, 2022:

About fine letter notification:

I reviewed the complete fine notification. The fine is based on the faulty information published in the 48 hour report and the eventual campaign finance filing. The point is we either did in fact disclose the contribution/loans or did not have to. We have 40 days or May 2, 2022 to contest the fine.

I spoke with [REDACTED] <administrativefines@fec.gov> about the fine. I explained the situation to her about the duplicate entries and the Actblue contributions. She said that so long as we were in compliance we could contest the fine altogether. In our eventual response, we need to say the following in a letter addressed to the FEC:

An audit of our account was recently completed to indicate a number of duplicate entries in our filings and entries that were not required to be included in the 48-hour report. We are working carefully to complete the necessary amendments to this and other filings. Please reconsider your findings based on the new information provided below. [Go line by line and explain a narrative to the chart item. Explain each transaction.] As indicated, we feel that we are in compliance with the 48-hour reporting requirement and respectfully request the FEC rescind this fine. Thank you.

The good news is that they will wait for us to enter the amendment for as long as possible so there is no need to rush our amendments. Simply entering the response above will satisfy the fine. They don't need "evidence" in our response and they will rely on our amended filings once they are entered.

Now, for our mini-audit, the questions to confirm are one particular loan for \$40,000 and the smaller \$1,000 contributions. The other loan entries in that time period were reported incorrectly. With this information, we can confirm what we were liable to include in 48-hour reports or provide additional information that we can rely on to argue our case.

Please have [REDACTED] confirm the following information:

Sheila Loan 10/15/2021 \$40,000.00 when this amount was sent AND received to the campaign account.

Actblue 10/17/2021 \$1,124.44 Check [REDACTED] when was this amount received to the campaign account

Actblue 10/31/2021 \$3,913.11 Check [REDACTED] when was this amount received to the campaign account

FYI - These loan entries in the 48-hour report are incorrect (REPORTING PERIOD STARTED 10/13/21-10/30/21:

10/23/21 \$341,000 Loan

10/29/21 \$50,000 Loan

11/01/21 \$50,000 Loan (didn't have to disclose)

How it reports in our campaign finance filing:

10/15/21 \$40,000

10/18/21 \$211,000 (incorrect; reflects contributions 10/18/21 for \$140,000, 10/18/21 for \$11,000 and 10/19/21 for \$60,000)

10/23/21 \$341,000 (correct but includes the \$211,000 amount above plus the contributions from 10/15/21 for \$40,000 and 10/25/21 for \$90,000)

10/25/21 \$341,000 duplicate

10/25/21 \$341,000 duplicate

Other loan entries are accurate and accounted for.

EXHIBIT 18

From: Individual 1 <[REDACTED]@gmail.com>
Sent: Fri 11/19/2021 12:30:11 PM (UTC-05:00)
To: Edwin Cherfilus <[REDACTED]@gmail.com>, Sheila Cherfilus McCormick <[REDACTED]@hotmail.com>, Sheila Cherfilus McCormick <[REDACTED]@me.com>
Subject: But no record can be found of a candidate who's not yet a member being disciplined for withholding the required pre-election disclosure.

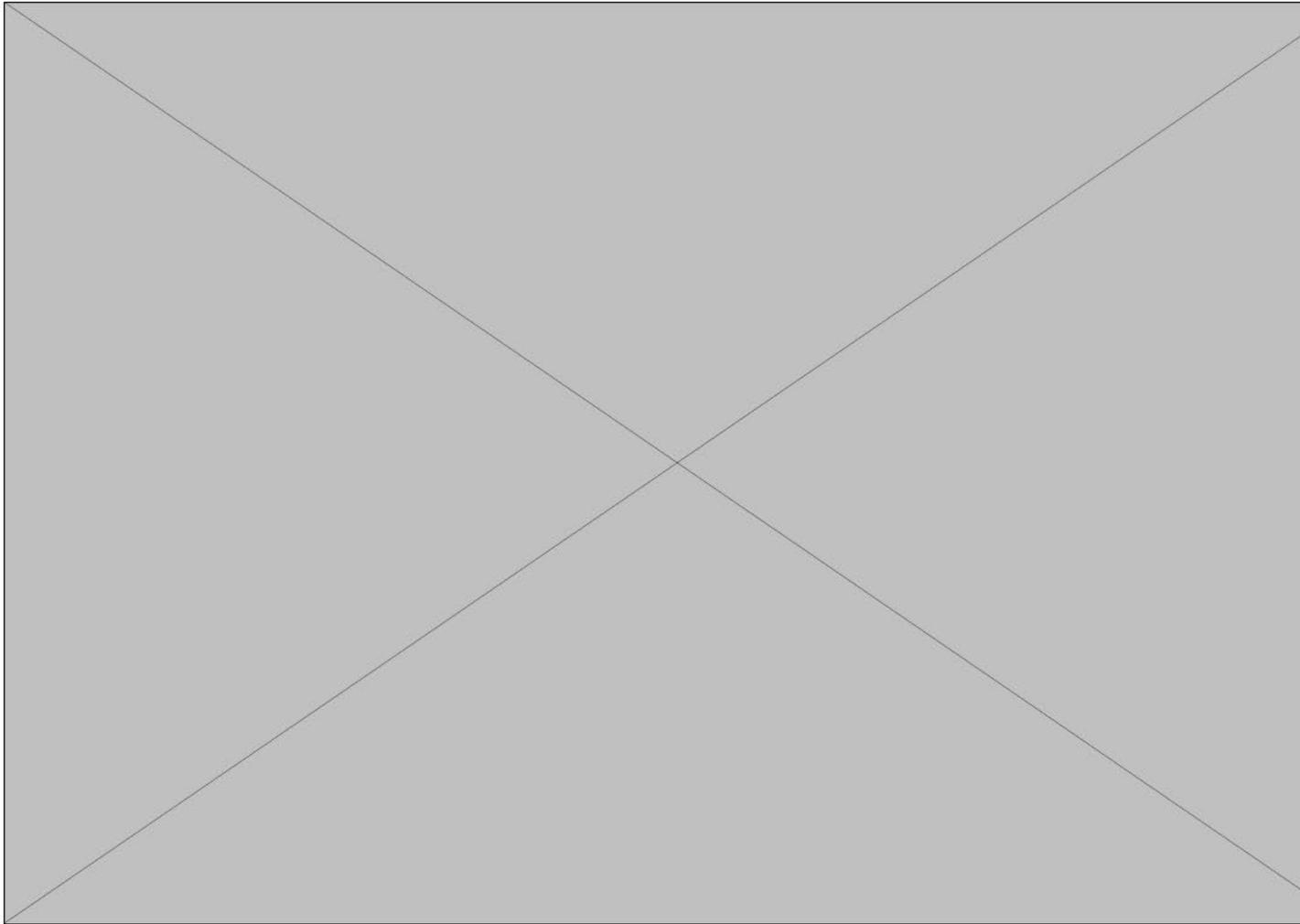
Sheila Cherfilus-McCormick and her mystery money | Editorial

By **SUN SENTINEL EDITORIAL BOARD**

SOUTH FLORIDA SUN SENTINEL |

NOV 19, 2021 AT 10:35 AM

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Sheila Cherfilus-McCormick speaks with the media after being declared the winner of the South Florida 20th Congressional District primary election by the Broward elections Canvassing Board on Friday, Nov. 12, 2021 in Lauderhill. (John McCall/South Florida Sun Sentinel)

The phrase “political ethics” should not be an oxymoronic punch line, and laws are in place to prevent that. But any law is no better than the extent to which it’s obeyed and enforced, and in South Florida, we see a glaring example of willful disrespect.

Sheila Cherfilus-McCormick, the Democratic nominee in the Jan. 11 special election in Congressional District 20, has not complied with a law requiring candidates to disclose to the clerk of the House of Representatives key aspects of their personal finances. Those financial disclosures [are posted](#)

[online](#) for voters to review, and the law applies once candidates raise or spend \$5,000. She passed that financial milestone long ago.

ADVERTISING

Whatever Cherfilus-McCormick is hiding might explain how she was able to lend her campaign a staggering \$3.7 million on her way to winning the recent Democratic primary by a scant five votes out of 49,082 votes cast over runner-up Dale Holness. She eventually repaid herself some \$2 million, but by then, her huge deposit discouraged donors from helping Holness and other candidates.

[RELATED: Florida certifies Cherfilus-McCormick's win in congressional Democratic primary »](#)

That hair-splitting outcome unquestionably owed much to her enormous campaign ante, which paid for a barrage of television ads. But the voters deserve to know exactly how she came by so much mystery money.

The last word from her campaign on Sept. 30 was that “we are working on the finance disclosure form and have requested an extension in submitting it.” The U.S. House Clerk routinely posts extension requests. As of Nov. 18, there was no disclosure or posted request for an extension. We reached her by phone Wednesday. She said she would call back but didn't.

Mystery money

Did her mystery money come from money borrowed from elsewhere? If so, from whom? Is it from savings? Investments? Is it income from her employment as CEO of a home health care agency? What personal wealth or connections would provide such resources, and what potential conflicts of interest might they entail?

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Those are among the questions meant to be answered by the disclosure required under the Ethics in Government Act *before* the voters pass judgment on a candidate. Members of the House and their employees must also file annually.

Cherfilus-McCormick is a repeat offender. In 2018, when she ran in a Democratic primary against Rep. Alcee Hastings, who died in April and whom she seeks to replace, she filed nothing with the clerk but a request for an extension. In her Federal Election Commission filings, she reported lending herself only \$7,450 for the 2018 campaign. What explains the enormous increase this time?

The House has no authority over candidates until they are elected, at which point the bipartisan [House Ethics Committee](#), chaired by Rep. Ted Deutch, D-Boca Raton, can and often does prompt delinquent members to file reports. Republican Rep. John Rutherford of Jacksonville is also an ethics committee member.

Members are also subject to investigation by the independent Office of Congressional Ethics. It reports having initiated 226 investigations since its inception 12 years ago, of which it referred 92 to the House. They dealt mostly with allegations of false or incomplete annual reports and stock transaction disclosures, and the panel recently announced further investigations against four members over stock trades, improper use of campaign funds and awarding contracts to an aide's relatives.

But no record can be found of a candidate who's not yet a member being disciplined for withholding the required pre-election disclosure. That failure is conspicuous.

Power to prosecute

The law gives the U.S. attorney general power to prosecute willful violations, punishable by up to a year in prison and a \$62,313 fine. No one seems to remember that happening, either.

The seat Hastings held for nearly three decades has been vacant since his

death last April, leaving hundreds of thousands of residents of South Florida with no political representation.

Voters will choose on Jan. 11 among Cherfilus-McCormick, Republican Jason Mariner, Libertarian candidate Mike ter Maat and two candidates with no party affiliation, Jim Flynn and Leonard Serratore. The deadline to register to vote in this election is Dec. 13.

The 20th district, in Broward and Palm Beach counties, is one of the most heavily Democratic in the country, so Cherfilus-McCormick's election is virtually assured. That's all the more reason why she must obey the law and disclose her personal finances sooner rather than later.

The House of Representatives could refuse to seat her if she has still not complied with the law after the election is decided, but there has been an unwritten understanding between the two parties to never set that example. What good is a law that's not enforced? So what say you, Attorney General Merrick Garland? Ignoring an ethics law is no laughing matter.

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EXHIBIT 19

December 4, 2023

The Honorable Michael Guest, Chairman
The Honorable Susan Wild, Ranking Member
U.S. House of Representatives Committee on Ethics
1015 Longworth House Office Building
Washington, DC 20515

VIA ELECTRONIC MAIL

Re: OCE Review No. 23-7239

Dear Chairman Guest and Ranking Member Wild:

We write on behalf of Representative Sheila Cherfilus-McCormick in response to the referral transmitted by the Office of Congressional Ethics (“OCE”) in Review No. 23-7239. We respectfully submit that the Committee on Ethics (the “Committee”) should dismiss OCE’s referral and take no further action. The Congresswoman is prepared to work with the Committee toward that end.

INTRODUCTION

Representative Cherfilus-McCormick became a Member of the U.S. House of Representatives on January 18, 2022, following a special election to succeed the late Representative Alcee Hastings in Florida’s 20th District. A few short months after beginning her first full term in office on January 3, 2023, she received notice that OCE had initiated a preliminary review into whether she may have utilized campaign staff or volunteers to work on official communications.¹ OCE’s findings (the “Findings”) now assert four violations, only one of which was disclosed to the Congresswoman in the Statement of the Nature of Review. Rather than review discrete, properly noticed allegations, as House rules require, OCE undertook a sweeping investigation of the Member’s campaign and her personal and family finances.

Despite its myriad allegations, at bottom the Findings demonstrate the Member’s commitment to compliance with applicable laws and regulations. To the extent that any mistakes were made by Representative Cherfilus-McCormick, her campaign, or office staff during the heat of a busy campaign and her first term in office, they were just that: inadvertent mistakes caused by inexperience, with no discernable risk of any corrupting influence. Representative Cherfilus-McCormick has taken several remedial measures to address these missteps, including engaging the services of a professional compliance firm, taking action to ensure staff members are properly trained, and actively working with the Federal Election Commission (“FEC”) to correct any

¹ Letter from Omar S. Ashmawy to the Honorable Sheila Cherfilus-McCormick (Apr. 24, 2023) (Statement of the Nature of Review).

campaign reporting errors where necessary and to require her staff to participate in FEC compliance trainings.²

While claiming simply that the Congresswoman “did not cooperate,”³ OCE fails to acknowledge the information she and her representatives did provide, even while she raised serious concerns about the review that OCE disregarded. She produced documents to OCE on the allegation it purported to be reviewing. Several members of her staff voluntarily sat for interviews, and her accountant produced requested financial documents to OCE. In its turn, OCE does not acknowledge seeking an enormous range of information far beyond the disclosed scope of its review.⁴ Our legitimate objections to OCE acting beyond the scope of its review should not be misconstrued as non-cooperation.

DISCUSSION

The Findings include four substantive allegations, none of which demonstrate the Representative’s awareness of any wrongdoing, and all of which she is taking steps to remediate.

Payments to Leadership in Action

OCE cites several expenditures by a Florida state political action committee, Leadership in Action, purportedly in support of Representative Cherfilus-McCormick’s congressional campaign. The referral makes thinly veiled and inflammatory assertions, with no supporting evidence, questioning whether donations made to the PAC by SCM Consulting Group, LLC—a Florida limited liability company in which the Representative was the sole member, and which operated as the equivalent of a sole proprietorship—represented the Congresswoman’s personal funds.

Without disclosing the claim to the Congresswoman as grounds for the review, and while providing no factual support, OCE nonetheless suggests in its transmittal that there is reason to believe that the funds contributed were not her personal funds. Unfortunately, this baseless allegation will now be part of the public record and a source of unwanted attention and political embarrassment to the Congresswoman.⁵

OCE fails even to acknowledge the existence of the controlling law. FEC rules clearly say that a contribution from an LLC with a single natural person member that does not elect to be treated as a corporation by the Internal Revenue Service is “attributed only to that single member.”⁶ Put simply, a single-member LLC in which a candidate is the sole individual member is treated as the candidate herself for purposes of FEC contribution limits and prohibitions. SCM Consulting Group, LLC was taxed as part of Representative Cherfilus-McCormick’s personal tax return.⁷ It was a single-member limited liability company and not taxed as corporation under the Internal Revenue Code nor treated as a corporation under the Federal Election Campaign Act. Under FEC

² See Negotiated Settlement in ADR Matter 1111 (Oct. 18, 2023).

³ OCE Findings in Review No. 23-7239 (“OCE Findings”) at ¶ 47.

⁴ See Letter from Brian Svoboda to Omar Ashmawy (June 14, 2023).

⁵ See OCE Findings at ¶ 29.

⁶ 11 C.F.R. § 110.1(g)(4).

⁷ See Exhibit A, Internal Revenue Service Form 1040 (2021) of Sheila Cherfilus, Schedule C.

rules, any contributions by SCM Consulting Group, LLC are attributed to its single member: Representative Cherfilus-McCormick.

Representative Cherfilus-McCormick does not dispute that Leadership in Action may have made expenditures supportive of her campaign with the funds she provided it. She made disbursements to Leadership in Action, understanding that she was providing it with funds that would be used to advance her campaign and others on the ticket. She did so with funds eligible for use in her campaign, and she understood that the payments would be handled and reported correctly. It should be noted that FEC regulation in this area is underdeveloped and when work with allied groups becomes a contribution is not well marked.

Both contributions to and expenditures by Leadership in Action were publicly disclosed, as is required by Florida election law. If upon review any campaign expenditures made by Leadership in Action were sufficiently coordinated that they should have been reported as contributions to or expenditures of Sheila Cherfilus McCormick for Congress, the campaign is prepared to make the necessary corrections. Representative Cherfilus-McCormick has taken significant steps toward correcting the record where necessary and ensuring her campaign properly reports all activity going forward. To ensure that her campaign is fully complying with the law, she has hired an experienced compliance firm to handle fundraising and FEC reporting. The campaign is also actively working with the FEC to amend reports where necessary pursuant to a settlement agreement with the agency's Alternative Dispute Resolution office.⁸ Representative Cherfilus-McCormick is committed to taking all steps necessary to ensure her campaign's reporting is complete and accurate.

Services Related to Franked Communications and Other Office Work

In May and June of 2022, Representative Cherfilus-McCormick's staff sought and received approval from the Commission on Mailing Standards of the frankability of three television ads.⁹ There is no finding or suggestion that the materials were not frankable or were made for political purposes. OCE instead contends that Mark Goodrich's role in working on the communications, as well as other work including a March 2022 newsletter and May 2022 legislative update mailer, constituted the use of unofficial funds to defray official expenses.

Mr. Goodrich's apparent work for the first of the communications at issue in OCE's Findings, the March 2022 newsletter, began less than *two months* after Representative Cherfilus-McCormick was sworn in.¹⁰ The newly elected Representative and her novice staff turned to Mr. Goodrich as a trusted and knowledgeable source to seek advice on media activities they themselves were not experienced in navigating. The office was caught unaware that seeking advice from a trusted individual could be construed as a violation of House rules.¹¹ Indeed, when the office began receiving questions from reporters regarding the franked television advertisements, Representative

⁸ See Negotiated Settlement in ADR Matter 1111 (Oct. 18, 2023).

⁹ See H. Comm'n Standards Comm'n's Advisory Opinions 33374-31, 33374-32, 33374-33.

¹⁰ See OCE Findings at ¶ 80.

¹¹ Nor does it appear that Mr. Goodrich himself had significant experience working with franked communications. See, e.g., *id.*, Exhibit 45, 23-7239_0442 (email from Mr. Goodrich noting that the office had initially submitted the wrong NAB form for the television advertisements).

Cherfilus-McCormick instructed her staff to consult with the Committee regarding whether a third party was permitted to volunteer to help the office get pricing for television spots.¹² The documents evidence her surprise that volunteer efforts of this limited nature may be prohibited.

Though the services provided by Mr. Goodrich may have exceeded the level of volunteer activity that the Committee ordinarily permits, the referral on the whole shows a freshman Member's desire to comply with the relevant rules. She and her office are in the process of ensuring that all staffers are properly trained regarding the rules surrounding volunteer services and unofficial office accounts.

Payments by Truth & Justice, Inc.

The Findings assert that Truth & Justice, Inc., a Florida company, may have paid a vendor, Image Plus Graphics, for campaign communications.¹³ Nowhere in these allegations is any suggestion that Representative Cherfilus-McCormick participated in or was even aware of any transactions between Truth & Justice, Inc. and Image Plus Graphics. Instead, the record indicates only that Mark Goodrich interacted with the vendor and sent payments.¹⁴ Representative Cherfilus-McCormick will ensure that all current staff and volunteers are trained so that any campaign expenditures are properly paid through Sheila Cherfilus McCormick for Congress.

Campaign Transactions with Representative Cherfilus-McCormick's Businesses

Finally, the Findings claim that Representative Cherfilus-McCormick may have failed to report transactions between her campaign account and business accounts. If any inadvertent reporting errors may have occurred during the height of the campaign, the Congresswoman reiterates her strong commitment to ensuring her committee's reports are accurate. As noted, she has hired a professional compliance firm and is currently working to gather the necessary information and to amend reports where necessary, consistent with the agreement into which the campaign entered with the FEC over its activity during the same election cycle in which these transactions occurred.

For the reasons set forth above, Representative Cherfilus-McCormick respectfully requests that the Committee on Ethics dismiss Review No. 23-7239.

Very truly yours,



Brian G. Svoboda
Antoinette M. Fuoto
Counsel to Representative Cherfilus-McCormick

¹² See *id.*, Exhibit 47, 23-7239_0463.

¹³ While the Findings refer to one communication as the "Truth" mailer, *see, e.g., id.* at ¶ 111, the documents demonstrate that the mailer was so named because of its prominent references to "The Truth." See *id.*, Exhibit 76, 23-7239_0561.

¹⁴ See *id.*, Exhibit 75, 3-7239_0556-0557.

EXHIBIT 20



250 Massachusetts Ave NW, Suite 400 | Washington, DC 20001

June 16, 2024

VIA ELECTRONIC MAIL

The Honorable Michael Guest, Chairman
The Honorable Susan Wild, Ranking Member
Committee on Ethics
U.S. House of Representatives
1015 Longworth House Office Building
Washington, D.C. 20515

Re: OCE Review No. 24-7241

Dear Chairman Guest and Ranking Member Wild:

We write on behalf of Representative Sheila Cherfilus-McCormick, in response to the Report and Findings (the “Report”) in this review, transmitted by the Office of Congressional Ethics (“OCE”) and provided by the U.S. House of Representatives Committee on Ethics (the “Committee”) to Representative Cherfilus-McCormick on May 29, 2024.

The record demonstrates that Representative Cherfilus-McCormick largely cooperated with OCE’s review. Although she was not interviewed, she submitted over 2,000 pages of documents, including documents related to the Figgers Foundation Community Funding Project and contributions made by members of the Figgers family to Representative Cherfilus-McCormick’s campaign. Those documents show that Representative Cherfilus-McCormick complied with House Rules and the Guidelines set forth by the House Committee on Appropriations when she requested Community Project Funding to benefit constituents of her district. She requested funding for a nonprofit organization—the Figgers Foundation—not any for-profit entity, and she did not dispense any special privileges to anyone in the process. Representative Cherfilus-McCormick’s campaign separately received contributions from members of the Figgers family more than a year after she submitted the the request for funding for the Figgers Foundation, and those contributions were properly reported on her campaign’s disclosure reports with the Federal Election Commission.

Representative Cherfilus-McCormick understands, based on OCE’s review and the Report, that there were text messages sent on behalf of her campaign that have not yet been invoiced or paid for by her campaign. She intends to immediately rectify this issue. Representative Cherfilus-McCormick will request the appropriate invoices from the company that provided the text

messaging services and direct her campaign to pay them. There is no basis to further investigate this issue.

For the reasons set forth herein, Representative Cherfilus-McCormick respectfully requests that the Committee dismiss this referral pursuant to Rule 17A(e) of the Rules of the Committee on Ethics for the reasons set forth herein.

I. STATEMENT OF FACTS

A. The OCE Review Process

On January 22, 2024, OCE notified Representative Cherfilus-McCormick that it was initiating a review of the following four open-ended allegations: (1) that Representative Cherfilus-McCormick may have misreported the source of a campaign contribution or accepted a campaign contribution made by one person in the name of another; (2) that she may have accepted campaign contributions linked to an official action; (3) that she may have requested Community Project Funding that would be directed to a for-profit entity; and (4) that her congressional office may have made payments to an entity in violation of House committee rules and standards of conduct.

The Statement of the Nature of the Review letter from OCE was accompanied by a wide-ranging Request for Information (the “First RFI”). The First RFI requested the production of a vast number of documents and communications, including all communications since January 2021 that Representative Cherfilus-McCormick and her staff made with three individuals – Freddie Figgers, who owns a prominent telecommunications company in her district, Natlie Figgers, and Betty Figgers – or any entity owned or controlled by Mr. Figgers.

On February 23, 2024, OCE sent a second RFI (the “Second RFI”) that appeared to focus on an entirely new set of allegations far beyond the scope of the Statement of the Nature of the Review. The Second RFI asked for a similarly large number of documents including all documents and communications related to ten different Community Project Funding applicants. Representative Cherfilus-McCormick, through counsel, repeatedly asked OCE to disclose whether it was reviewing additional allegations against her. In each instance, she was denied any additional information and any factual predicate or source for the allegations, and thus deprived of the most basic right to confront the allegations made against her.

OCE sent the Report to the Committee on May 29, 2024, recommending that two of the allegations be dismissed and three of the allegations be further reviewed. The Report mischaracterizes Representative Cherfilus-McCormick as a non-cooperating witness. Although she declined to be interviewed by OCE, Representative Cherfilus-McCormick and her chief of staff voluntarily produced *thousands* of pages of documents and communications to OCE at significant time and expense, a fact the Report entirely fails to acknowledge.

B. Facts Related to the Initial Allegations

1. Campaign Contributions Made by Members of the Figgers Family

Representative Cherfilus-McCormick was sworn into Congress on January 18, 2022.¹ Her principal campaign committee is Sheila Cherfilus McCormick for Congress, Inc. (the “Campaign”). Freddie Figgers and his wife Natlie Figgers have been strong supporters of Representative Cherfilus-McCormick, including during the earliest stages of her 2021 campaign.² Mr. Figgers is the president of Figgers Communications and Figgers Enterprise—telecommunications companies based in Representative Cherfilus-McCormick’s congressional district.³

Mr. Figgers also serves as the Board Chair of Figgers Foundation (the “Foundation”), a 501(c)(3) tax-exempt charitable organization.⁴ Copies of the Foundation’s exemption letter and Forms 990 are available on the IRS website.⁵ The Foundation’s work includes distributing laptops to students in need, providing scholarships to underprivileged children, and offering programming to reduce health inequities.⁶

Freddie and Natlie Figgers are also active political donors. Together, they have made more than \$244,000 in political contributions to federal candidates and PACs since 2019, including contributions to Representative Cherfilus-McCormick’s campaign.⁷ Mr. Figgers appears to have mistakenly made two contributions—each in the amount of \$6,600—to the Campaign on May 26, 2023, via ActBlue.⁸ On July 13, 2023, the Campaign’s compliance team discovered the error and, because the contributions exceeded the limits, the compliance team requested that ActBlue issue a refund in the amount of \$6,600 to Mr. Figgers. ActBlue immediately refunded the excessive contribution.⁹

Separately, on June 20, 2023, Natlie Figgers contributed \$6,600 to the Campaign. And three months later, on September 19, 2023, Betty Figgers—Freddie Figgers’s mother—also contributed

¹ CBS News, *Sheila Cherfilus-McCormick Sworn Into Congress* (Jan. 18, 2022), available at <https://www.cbsnews.com/miami/news/sheila-cherfilus-mccormick-sworn-into-congress/>.

² See e.g., OCE Exhibit 16; OCE Exhibit 17; OCE Exhibit 18.

³ See Figgers Communications, Leadership, Freddie Figgers, available at <https://www.figgers.com/leadership/freddie-figgers/>; Florida Dep’t of State, Division of Corporations, Figgers Enterprise Inc., available at <https://search.sunbiz.org/Inquiry/corporationsearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=FIGGERSENTERPRISE%20P190000100740&aggregateId=domp-p19000010074-5d30bda1-b07e-4bb4-a836-0468402759d4>.

⁴ Figgers Foundation, Board of Directors, Freddie Figgers, available at <https://www.figgersfoundation.org/BoardOfDirectors>.

⁵ See Internal Revenue Service, Tax Exempt Organization Search, available at <https://apps.irs.gov/app/eos/>.

⁶ Figgers Foundation, Our Work, available at <https://www.figgersfoundation.org/ourwork>.

⁷ Federal Election Commission, Receipts by Freddie Figgers and Natlie Figgers, available at https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=Freddie+Figgers&contributor_name=Natie+Figgers.

⁸ See SCM_OCE000588 – SCM_OCE000589.

⁹ See SCM_OCE000589.

\$6,600. Each of the contributions made by Freddie Figgers, Natlie Figgers, and Betty Figgers were properly reported on the Campaign’s filings with the Federal Election Commission.

2. Community Project Funding for Figgers Foundation

In April 2022, Representative Cherfilus-McCormick submitted a request to the Committee on Appropriations for Community Project Funding (“CPF”) for funding for the Figgers Foundation to provide tablet computers that would allow low-income senior citizens, veterans, and families of children with disabilities to access important telehealth services. The application specified that the funds would be directed to the Foundation to support “the manufacture and distribution of 15,000 enhanced telehealth-enabled tablet computers” to constituents in need—activity consistent with the Foundation’s mission.¹⁰ As required, Representative Cherfilus-McCormick posted the request on her website and truthfully certified that neither she nor her immediate family had any financial interest in the project.¹¹ Over two dozen letters of public support from public officials, leaders of nonprofits, attorneys, and representatives from the education community were filed in support of the project.¹² After the Committee on Appropriations and relevant subcommittee *vett*ed and *approved* the request, it was included in the Fiscal Year 2023 appropriations bill.

3. Use of MRA Funds to Pay Figgers Enterprise, Inc. For Text Messages Sent On Behalf Of Official Office

Throughout 2023, Representative Cherfilus-McCormick’s Congressional Office (the “Office”) sent franked MMS messages to her constituents related to official activities. As required, these messages were paid for using funds from the Members Representational Allowance (the “MRA”). The Office contracted with Figgers Enterprise Inc., a company founded by Mr. Figgers, to send the messages at a cost of \$5,000 per month. Those amounts—which the Report notes are similar to amounts paid by other congressional offices—represent the fair market value of the text messages and were properly reported on the Office’s quarterly statements of disbursement.¹³

Representative Cherfilus-McCormick and her staff worked diligently with the House Communications Standards Commission to ensure that each message complied with the relevant franking regulations and House Rules. To that end, each message was vetted and approved in advisory opinions by the House Communications Standards Commission before they were sent. Documents produced to OCE also indicate that Representative Cherfilus-McCormick’s staff are

¹⁰ See Congresswoman Sheila Cherfilus-McCormick Letter to Committee on Appropriations (April 23, 2022), <https://cherfilus-mccormick.house.gov/sites/evo-subsites/cherfilus-mccormick.house.gov/files/evo-media-document/Figgers%20Financial%20Disclosures2.pdf>.

¹¹ See Congresswoman Sheila Cherfilus-McCormick Letter to Committee on Appropriations (April 23, 2022), <https://cherfilus-mccormick.house.gov/sites/evo-subsites/cherfilus-mccormick.house.gov/files/evo-media-document/Figgers%20Financial%20Disclosures2.pdf>.

¹² See SCM_OCE000607 – SCM_OCE000631.

¹³ See OCE Report and Findings at 18-19.

well aware of and strictly enforce the prohibition on using official funds for political purposes. When an invoice for MMS messages inadvertently included a campaign-related text message, Rep. Cherfilus-McCormick’s staff immediately identified the error, confirming that the campaign text message “did not come from the Member’s official expenses,” and noting that the campaign text message should not have been included on the invoice and that they would correct the error.¹⁴ The error on the invoice was rectified before any payments were made.¹⁵

II. ARGUMENT

A. OCE’s Referral of the Allegation Regarding Requesting Community Project Funding That Would Be Directed to a For-Profit Entity was Plainly Erroneous.

1. Relevant Guidelines for Community Project Funding Requests

In 2022, the House Committee on Appropriations invited Members of Congress to request funding for projects in their communities.¹⁶ The Committee on Appropriations issued specific guidelines for Members to request funds, including but not limited to the following:

- Each Member was permitted to submit up to fifteen (15) Community Project Funding requests through a Member Database;
- Only projects with demonstrated community support would be considered;
- Members were required to certify in writing that neither they nor their immediate family had a financial interest in the requested project;
- The Committee on Appropriations would apply a 15-day review period between the deadline for the submission and posting the submission on the Member’s website to ensure that subcommittee staff had time to review requests and make sure they were appropriately categorized as a Community Project Funding Request;
- Members would be required to post Community Project Funding Requests and associated certifications of no financial interest on their official House websites after the 15-day Committee review period ended and no later than 20 days after the submission deadline; and

¹⁴ See SCM_OCE002213 – SCM_OCE002215.

¹⁵ See e.g., SCM_OCE002213 – SCM_OCE002215.

¹⁶ House Committee on Appropriations, Fiscal Year 2023, available at https://democrats-appropriations.house.gov/transparency/fiscal-year-2023?_gl=1*1ojfy65*_ga*MTUxNDg3NDI5Mi4xNzA4NjI1NTA5*_ga_L2WB5KYYFC*MTcxNzk5MDYyOC4xLjEuMTcxNzk5MDYzNi4wLjAuMA.

- The Committee’s website would include a link allowing the public to directly view all Community Project Requests submitted to the Committee.¹⁷

Once the appropriate subcommittee received a request for Community Project Funding, it would decide whether to grant the request by considering compliance with the following:

- The Committee imposed “a ban on directing Community Project Funding to for-profit entities;”
- To the extent a federal program eligible for a Community Funding Request required a state or local match, the Committee would not waive those match requirements;
- Requests could only be for fiscal year 2023, and could not include a request for multiyear funding;
- Members were encouraged to consider public entities such as state, local, or Tribal governmental entities as grantees; and
- If a Member requested that funding be directed to a non-profit organization, the Member needed to provide evidence that the recipient is a non-profit organization by either supplying the Employer Identification Number or an IRS determination letter.¹⁸

The guidelines also state that: “While members are required to certify to the Committee that neither they nor their immediate family has a financial interest in a proposed project, Members should also be fully aware of any other financial aspects or relationships associated with the proposed project that might raise ethical concerns. These include but are not limited to lobbyists, donors, or other affiliated parties that have an interest in the project.”¹⁹

2. Representative Cherfilus-McCormick Complied With the Relevant Rules and Guidelines Regarding Community Project Funding.

Representative Cherfilus-McCormick’s request for Community Project Funding for the Figgers Foundation complied with both the guidelines set forth by the Committee on Appropriations and House Rules. Representative Cherfilus-McCormick requested funding for the Figgers Foundation, which is a nonprofit organization exempt from taxation under section 501(c)(3) of the Internal Revenue Code. The Figgers Foundation obtained tax-exempt status effective September 18, 2018. The purpose of the community project Representative Cherfilus-McCormick sought funding for was to make healthcare more accessible and affordable for Representative Cherfilus-McCormick’s constituents in Florida’s 20th Congressional District.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Id.*

Representative Cherfilus-McCormick accurately provided information about the proposed project to the Committee on Appropriations when she made the funding request. The request was accompanied by 25 letters of public support from public officials, leaders of nonprofits, attorneys, and education representatives.²⁰ Her office disclosed the proposal on their website as required.²¹ And Representative Cherfilus-McCormick truthfully certified that neither she nor her immediate family had any financial interest in the project.²² The Committee reviewed the information submitted and decided to approve funding for the project.

Despite the Committee’s approval, and despite the fact that Representative Cherfilus-McCormick clearly requested funding for the Figgers Foundation, a tax-exempt nonprofit organization, OCE initiated an investigation into whether Representative Cherfilus-McCormick directed Community Project Funding to a for-profit entity. OCE’s theory appears to be that because the Figgers Foundation—not Representative Cherfilus-McCormick or anyone in her Office—may have used Community Project Funding to purchase tablets or wireless services from one of Freddie Figgers’s for-profit corporations, Representative Cherfilus-McCormick may have directed funds to a for-profit entity. That allegation is wrong on all scores.

The record is clear: Representative Cherfilus-McCormick “requested that funding be directed to a non-profit organization,” in accordance with the Committee on Appropriations’ guidelines. When a Member requests funds for a non-profit organization, the Member is required to provide the organization’s EIN or a copy of its IRS determination letter, and Representative Cherfilus-McCormick complied with that requirement. Nowhere in the guidelines or elsewhere is there any affirmative requirement for a Member to investigate whether a nonprofit organization will obtain the supplies and services it needs to complete the community project from a for-profit entity. Nor is there any rule prohibiting Community Project Funding recipients from using funding to purchase products and services from a for-profit entity in furtherance of its approved project.

It was thus erroneous for OCE to refer this allegation to the Ethics Committee in the first place, and the Committee should dismiss it. There is no basis to impose a *new* obligation on Representative Cherfilus-McCormick to have investigated the details of the Figgers Foundation’s sourcing and procurement plans, and then potentially penalize her for the apparent failure to do so, when that obligation does not clearly exist in the Committee on Appropriations’ guidelines or House Rules.

Finally, OCE’s conclusion that it was unable to investigate this allegation because Representative Cherfilus-McCormick failed to cooperate with its review is unfounded. Representative Cherfilus-McCormick produced documents in response to OCE’s broad request

²⁰ See SCM_OCE000607 – SCM_OCE000631.

²¹ See Congresswoman Sheila Cherfilus-McCormick, Community Funding Projects, <https://cherfilus-mccormick.house.gov/services/community-funding-projects>.

²² See Congresswoman Sheila Cherfilus-McCormick Letter to Committee on Appropriations (April 23, 2022), <https://cherfilus-mccormick.house.gov/sites/evo-subsites/cherfilus-mccormick.house.gov/files/evo-media-document/Figgers%20Financial%20Disclosures2.pdf>.

for “[a]ll documents and communications related to the ‘Figgers Tablets for Telemedicine’ project,” including but not limited to, her funding request submitted to the House Appropriations Committee and the communications with her staff and Mr. Figgers and his employees. Those documents show that Representative Cherfilus-McCormick intended to direct the funds to a nonprofit entity. This allegation should be dismissed.

B. OCE’s Referral of the Allegation that Representative Cherfilus-McCormick May Have Accepted Campaign Contributions Linked to Official Action Was Plainly Erroneous.

OCE also wrongly referred the allegation that contributions made by members of the Figgers family to Representative Cherfilus-McCormick’s Campaign may have been linked to an official action—namely, Representative Cherfilus-McCormick’s request for Community Project for the Figgers Foundation, which had been made over a year before the Figgers family made any contributions to her campaign. Notably, OCE did not find *substantial reason* to believe this violation occurred – the standard typically required to refer a matter to the Committee for further review.²³ Instead, OCE merely found that there was *probable cause* that a violation occurred, which is a lower standard of proof OCE relies on when it has not obtained enough information to support a *substantial reason to believe* finding.²⁴ It is not surprising that OCE was unable to meet its typical standard because this allegation is false, unsupported by the record evidence, and should be dismissed.

The record supports the conclusion that the contributions made by members of the Figgers family were lawful and made in the normal course through the ActBlue fundraising platform, irrespective of any official action taken by Representative Cherfilus-McCormick. To the best of her knowledge, Representative Cherfilus-McCormick produced to OCE every document and communication related to every campaign contribution made by Freddie Figgers, Natlie Figgers, and Betty Figgers that she had in her custody. None of those documents reveal any evidence even remotely suggesting that the contributions from members of the Figgers family were connected to any official action, including the Community Project Funding that had been requested for the Figgers Foundation more than a year earlier. Because there are no facts to support this allegation, OCE should not have found probable cause to refer it to the Committee. It should be dismissed.

C. Representative Cherfilus-McCormick’s Campaign Intends To Pay Figgers Enterprise for Texting Services Provided To Her Campaign.

Representative Cherfilus-McCormick’s official office contracted with Figgers Enterprise Inc. to send messages to her constituents at a cost of \$5,000 per month. OCE’s investigation revealed, however, that Figgers Enterprise also sent text messages on behalf of Representative Cherfilus-McCormick’s campaign that have not been invoiced or paid for by the campaign. Prior to OCE’s

²³ See Office of Cong. Ethics R. 9(A).

²⁴ *Id.*

review, Representative Cherfilus-McCormick was not aware of this oversight. Now that she has reviewed the issue, she intends to take the following remedial steps to correct this inadvertent error: *first*, Representative Cherfilus-McCormick intends to promptly request invoices from Figgers Enterprise for the text messages that were sent on behalf of her campaign, and *second*, Representative Cherfilus-McCormick will direct her campaign to pay those invoices or to amend her campaign's FEC reports to list the amount owed as campaign debt.

There is no basis for the Committee to further investigate whether Representative Cherfilus-McCormick used official funds to send text messages on behalf of her campaign, as the record clearly shows that MRA funds were only ever used to pay for texts sent on behalf of the official office. The contract between Figgers Enterprise and Representative Cherfilus-McCormick's office specified that Figgers Enterprise was being paid to send text messages on behalf of Representative Cherfilus-McCormick's official office, not her campaign. And all of the messages were vetted and approved in advisory opinions by the House Communications Standards Commission before they were sent. Moreover, the record reflects that Representative Cherfilus-McCormick's staff were well aware of and strictly enforced the prohibition on using official funds for political purposes. When an invoice from Figgers Enterprise inadvertently listed a campaign-related text message on it, Rep. Cherfilus-McCormick's staff immediately identified the error, made clear that the MRA funds were not to be used to pay for campaign messages, and ensured that the invoice was corrected before any payments were made.²⁵

Representative Cherfilus-McCormick will inform the Committee as soon as her campaign has paid Figgers Enterprise for the text messages or listed the amount owed as debt. The Committee should dismiss this allegation and take no further action.

D. OCE Correctly Recommended Dismissal of the Allegation Regarding Whether Representative Cherfilus-McCormick Dispensed Any Special Privileges

Apparently eager to demonstrate that Representative Cherfilus-McCormick somehow still must have violated House Rules associated with Community Project Funding requests, OCE fashioned a fourth allegation that was never disclosed to her, which was that Representative Cherfilus-McCormick "dispensed special favors or privileges to Commissioner Michael Joseph in connection with community project funding."²⁶ Generally, OCE may only refer an allegation to the Committee on Ethics if that same allegation was presented to the Board for preliminary review and second-phase review.²⁷ OCE claims to have the authority to add new allegations midway through the review – bypassing its own process. But its Rules and the House Resolution do not clearly provide such authority.²⁸ Here, OCE's manufactured process meant Representative Cherfilus-McCormick had no notice of this charge against her, nor did she have any opportunity to respond to it before the Board voted to initiate a second-phase review.

²⁵ See e.g., SCM_OCE002213 – SCM_OCE002215.

²⁶ OCE Report and Findings at 20.

²⁷ See Office of Cong. Ethics R. 8(A), 9(A).

²⁸ See generally, H. Res. 895, 110th Cong. § 1(c).

Because this allegation was never disclosed, Representative Cherfilus-McCormick was deprived of the most basic right of confronting it.

Nonetheless, OCE correctly voted to dismiss this allegation. Just as with the other allegations, OCE should not have initiated a review into this allegation in the first place. OCE's investigation only confirmed what was clear from the very beginning: Representative Cherfilus-McCormick followed the guidelines and House Rules regarding requests for Community Project Funding, and did not dispense any special privileges to Commissioner Joseph.

E. OCE Correctly Recommended Dismissal of the Allegation Regarding Misreporting of the Source of a Campaign Contribution or Acceptance of a Contribution in the Name of Another

The Committee should follow OCE's recommendation and dismiss the allegation that Representative Cherfilus-McCormick's campaign misreported the source of campaign contributions from a member of the Figgers family or that her campaign accepted a contribution in the name of another. The record confirms that Representative Cherfilus-McCormick's campaign issued a refund for the excessive contribution made by Freddie Figgers, and that Mr. Figgers's mother, Betty Figgers, made a contribution several months later from a separate card.²⁹

There is no evidence to support any allegation that the contributions made by Freddie and Betty Figgers were made directly or indirectly using funds from anyone other than the named contributors who were timely disclosed on the campaign's FEC reports. This allegation should be dismissed.

III. CONCLUSION

We respectfully request that the Committee on Ethics dismiss the referral of Representative Cherfilus-McCormick and close Review No. 24-7241. We appreciate the Committee's consideration.

Warm Regards,



Kate Sawyer Keane
Aria C. Branch
Dylon D. Busser
Irfan Mahmud
Counsel to Representative Sheila Cherfilus-McCormick

²⁹ *Id.*

Declaration

I, Representative Sheila Cherfilus-McCormick, declare (certify, verify, or state) under penalty of perjury that the response and factual assertions contained in the attached letter dated June 16, 2024, relating to my response to the May 29, 2024, Committee on Ethics letter, are true and correct.

Signature: 
Name: Representative Sheila Cherfilus-McCormick
Date: June 16, 2024