House Calendar No. 80

119TH CONGRESS *2d Session*	HOUSE OF REPRESENTATIVES	REPORT 119–693

CONTEMPT REPORT RELATED TO THE CONDUCT OF MICHAEL JOSEPH

REPORT

OF THE

COMMITTEE ON ETHICS

JUNE 10, 2026.—Referred to the House Calendar and ordered to be printed

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LETTER OF TRANSMITTAL

HOUSE OF REPRESENTATIVES,
COMMITTEE ON ETHICS,
Washington DC, June 10, 2026.

Hon. KEVIN F. MCCUMBER,
Clerk, House of Representatives,
Washington, DC.

DEAR MR. MCCUMBER: Pursuant to House rule XI, clauses 2(m)(1)(B) and 3(o)(1), House Rule XIII, clause 2(b)(1), and Rules 19(c)(3) and 26(n) of the Rules of the Committee on Ethics, we hereby submit to the House a resolution and an accompanying report, "Contempt Report Related to the Conduct of Michael Joseph."

Sincerely,

MICHAEL GUEST,
Chairman.
MARK DESAULNIER,
Ranking Member.

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House Calendar No. 80

119TH CONGRESS } HOUSE OF REPRESENTATIVES { REPORT
2d Session } { 119–693

CONTEMPT REPORT RELATED TO THE CONDUCT OF MICHAEL JOSEPH

JUNE 10, 2026

MR. GUEST, from the Committee on Ethics, submitted the following

REPORT

The Committee on Ethics (Committee) submits this report pursuant to House rule XI, clauses 2(m)(1)(B) and 3(o)(1), House rule XIII, clause 2(b)(1), and Rules 19(c)(3) and 26(n) of the Rules of the Committee on Ethics.

I. INTRODUCTION

On May 13, 2026, the Committee considered the Report of the Investigative Subcommittee (ISC) related to the conduct of Michael Joseph, which the ISC unanimously adopted on March 18, 2026. The ISC was impaneled to investigate allegations concerning Representative Sheila Cherfilus-McCormick and, in the course of its investigation, sought documents and testimony from Mr. Joseph. Mr. Joseph failed to comply with multiple subpoenas in the 118th and 119th Congresses. Accordingly, the Committee hereby adopts and incorporates by reference the ISC's Report.

II. FINDINGS OF THE COMMITTEE ON ETHICS

The Committee reviewed the Report transmitted by the ISC regarding Mr. Joseph's conduct and found that Mr. Joseph willfully failed to comply with multiple subpoenas issued by the Committee, impeding the ISC's investigation into the allegations concerning Representative Cherfilus-McCormick. The Committee agrees with the ISC's conclusion that Mr. Joseph's conduct is "egregious and warrants referral to the U.S. Department of Justice for contempt of Congress." [1]

[1] ISC Report at 11.

The Committee on Ethics, having considered this report, reports favorably thereon and recommends that the report be approved. The form of Resolution that the Committee would recommend to the House of Representatives for citing Michael Joseph for contempt of Congress pursuant to this Report is as follows:

HOUSE RESOLUTION

Resolved, That Michael Joseph shall be found to be in contempt of Congress for failure to comply with the subpoena *duces tecum* issued to him on September 11, 2025.

Resolved, That Michael Joseph shall be found to be in contempt of Congress for failure to comply with the subpoena *ad testificandum* issued to him on September 11, 2025.

Resolved, That pursuant to 2 U.S.C. §§ 192 and 194, the Speaker of the House of Representatives shall certify the Report of the Committee on Ethics, detailing the refusal of Michael Joseph to produce documents and appear before the Investigative Subcommittee as directed by these subpoenas, to the United States Attorney for the District of Columbia, to the end that Mr. Joseph be proceeded against in the manner and form provided by law.

Resolved, That the Speaker of the House shall otherwise take all appropriate action to enforce the subpoenas.

III. STATEMENT UNDER HOUSE RULE XIII CLAUSE 3(c)

The Committee made no special oversight findings in this Report. No budget statement is submitted. No funding is authorized by any measure in this Report.

APPENDIX A

ADOPTED BY THE INVESTIGATIVE SUBCOMMITTEE ON MARCH 18, 2026

119TH CONGRESS, 2D SESSION
U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON ETHICS

CONTEMPT REPORT RELATED TO THE CONDUCT OF MICHAEL JOSEPH

March 18, 2026

Mr. GARBARINO, from the Investigative Subcommittee, submitted the following

REPORT

To the Committee on Ethics

INVESTIGATIVE SUBCOMMITEE

Andrew Garbarino, New York
Chairman

Cliff Bentz, Oregon

Chrissy Houlahan, Pennsylvania
Ranking Member

Troy Carter, Louisiana

REPORT STAFF

Thomas A. Rust, *Chief Counsel/Staff Director*
Brittney Pescatore, *Director of Investigations*

Sydney R. Bellwoar, *Senior Counsel*
Jennifer Seeba, *Counsel*
Ray Rhatican, *Counsel*
Peyton Wilmer, *Senior Investigative Clerk*

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EXECUTIVE SUMMARY

The Committee on Ethics established an investigative subcommittee (ISC) in the 118th and 119th Congresses to review allegations relating to Representative Sheila Cherfilus-McCormick. The ISC identified Michael Joseph, the current mayor of North Miami Beach, Florida, as an individual with information relevant to its review. Mr. Joseph was a supporter and friend of Representative Cherfilus-McCormick and helped raise money for her 2022 re-election campaign. During its investigation, the ISC obtained evidence that Mr. Joseph established a company that served as a conduit through which a separate company, using funds primarily received from a foreign government, funneled impermissible corporate contributions to a second company that spent those funds for the benefit of Representative Cherfilus-McCormick's campaign. The ISC also obtained evidence that Mr. Joseph and other close advisors to Representative Cherfilus-McCormick set up those companies to conceal the source of the funds used to make significant expenditures in support of the campaign. Finally, the ISC has evidence that Mr. Joseph exerted significant influence over the community project funding requests that Representative Cherfilus-McCormick submitted to the Committee on Appropriations in Fiscal Year 2023.

Mr. Joseph declined to comply with the ISC's attempts to investigate his knowledge of and involvement in the matters under investigation. After Mr. Joseph ignored multiple requests for his voluntary production of documents and testimony, the ISC authorized subpoenas to compel the production of documents and testimony from him, and the Chairman and Ranking Member of the Committee issued those subpoenas. Mr. Joseph then refused to comply with the duly authorized subpoenas, despite numerous extensions and other attempts at accommodation by the ISC. At no point did Mr. Joseph offer a satisfactory legal justification for his failure to comply with the subpoenas. Accordingly, the ISC recommends that the Committee on Ethics adopt and transfer the following Report to the House of Representatives to take the necessary actions to find Mr. Joseph in contempt of Congress.

AUTHORITY AND PURPOSE

The Committee on Ethics (Committee) is a standing committee of the House of Representatives charged with fulfilling the House's duty to discipline its Members under Article I, Section 5, clause 2 of the U.S. Constitution: "Each House may … punish its Members for disorderly Behaviour, and, with the Concurrence of two thirds, expel a Member." Pursuant to that authority, the House has delegated many functions to the Committee, including the specific authority to investigate and advise upon ethics issues under House rules and federal law. Under House Rule X, the Committee is authorized to: enforce standards of conduct for Members, officers, and employees; to investigate alleged violations of any law, rule, or regulation; and to make recommendations to the House for further action. House Rule XI, clause 2(m)(1)(B), specifically authorizes the Committee and its subcommittees "to require, by subpoena or otherwise, the attendance and testimony of such witnesses and the production of such books, records, correspondence, memoranda, papers, and documents as it considers necessary."

The Committee may authorize an ISC to conduct such inquiry to determine if a Statement of Alleged Violation should be issued.[1] A Statement of Alleged Violation is a formal charging document filed by an ISC with the Committee containing specific allegations against a Member, officer, or employee of the House of Representatives of a violation of the Code of Official Conduct, or of a law, rule, regulation, or other standard of conduct applicable to the performance of official duties or the discharge of official responsibilities.[2]

Courts have recognized Congress's power to compel witnesses to testify and produce documents.[3] An individual has a legal obligation to comply with a duly issued and valid congressional subpoena, unless a valid privilege or other legal justification excuses compliance.[4] As the Supreme Court stated in *United States v. Bryan*:

> A subpoena has never been treated as an invitation to a game of hare and hounds, in which the witness must testify only if cornered at the end of the chase. If that were the case, then, indeed, the great power of testimonial compulsion, so necessary to the effective functioning of courts and legislatures, would be a nullity. We have often iterated the importance of this public duty, which every person within the jurisdiction of the Government is bound to perform when properly summoned.[5]

This matter was initially referred to the Committee by the Office of Congressional Conduct (OCC; at the time, the Office of Congressional Ethics). In early 2023, OCC investigated allegations that Representative Cherfilus-McCormick failed to report certain campaign contributions, received official services from an individual who was not compensated with official funds, and failed to report transactions between her campaign committee and her private businesses.[6] OCC transmitted its referral to the Committee on September 15, 2023, recommending that the Committee further review the allegations against Representative Cherfilus-McCormick. Shortly after referring this matter, OCC opened a second investigation into Representative Cherfilus-McCormick relating to allegations surrounding community project funding, dispensing special favors or privileges, misuse of the Members' Representational Allowance, and improper campaign contributions.[7] OCC transmitted its second referral to the Committee on May 29, 2024. During its second review, OCC identified Michael Joseph as an individual with relevant

[1] *See* Rules 2(g), 19, Rules of the Committee on Ethics.
[2] *See* Rule 2(h), 19, Rules of the Committee on Ethics.
[3] *See McGrain v. Daugherty*, 273 U.S. 135, 174 (1927) ("[T]he power of inquiry—with process to enforce it—is an essential and appropriate auxiliary to the legislative function."); *Barenblatt v. United States*, 360 U.S. 109, 111 (1959) ("The scope of the power of inquiry, in short, is as penetrating and far-reaching as the potential power to enact and appropriate under the Constitution.").
[4] *See Watkins v. United States*, 354 U.S. 178, 187-88 (1957) ("It is unquestionably the duty of all citizens to cooperate with the Congress in its efforts to obtain the facts needed for intelligent legislative action.").
[5] *United States v. Bryan*, 339 U.S. 323, 331 (1950).
[6] *See* OCC Report and Findings, Rev. No. 23-7239 (Sept. 15, 2023), *available at* https://ethics.house.gov/wp-content/uploads/2025/01/OCE-Report-and-Findings-1.pdf.
[7] OCC Report and Findings, Rev. No. 24-7241 (May 22, 2024) (hereinafter Second OCC Report and Findings), *available at* https://ethics.house.gov/wp-content/uploads/2026/01/OCC-Report-and-Findings-1.29.26.pdf.

information. Mr. Joseph did not cooperate with OCC's review, and OCC recommended that the Committee subpoena him.[8]

On December 27, 2023, the Committee announced it had unanimously voted to impanel an ISC with jurisdiction to determine whether Representative Cherfilus-McCormick may have: violated campaign finance laws and regulations in connection with her 2022 special election and/or 2022 re-election campaigns; failed to properly disclose required information on statements required to be filed with the House; and/or accepted voluntary services for official work from an individual not employed in her congressional office, in violation of House Rules, federal law, applicable regulations, or other standards of conduct. On June 25, 2024, after receipt of the second OCC referral, the Committee announced it had voted to expand the jurisdiction of the ISC's inquiry into Representative Cherfilus-McCormick to include allegations that Representative Cherfilus-McCormick may have: engaged in improper conduct in connection with community project funding requests; misused official funds for campaign purposes; and/or violated campaign finance laws and regulations in connection with her 2024 re-election campaign, in violation of House Rules, federal law, applicable regulations, or other standards of conduct. On July 25, 2025, the Committee announced it had unanimously voted to re-impanel an ISC to investigate allegations involving Representative Cherfilus-McCormick during the 119th Congress; this ISC maintained the expanded jurisdiction from the prior Congress.

The ISC met 12 times over the 118th and 119th Congresses to conduct its investigation into allegations involving Representative Cherfilus-McCormick. 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. On December 16, 2025, the ISC adopted a Statement of Alleged Violations regarding Representative Cherfilus-McCormick, and on January 21, 2026, the ISC transmitted it to the Committee.[9] An Adjudicatory Subcommittee was subsequently impaneled pursuant to Committee Rule 23.

BACKGROUND

As explained more fully below, the ISC sought testimony and documents from Mr. Joseph that were directly relevant to its investigation into allegations against Representative Cherfilus-McCormick. Despite the ISC making repeated requests and issuing multiple subpoenas, Mr. Joseph did not cooperate. Instead, he ignored the ISC and, when he did communicate, he asserted that he had no relevant documents and, later, that any information he did have was protected by attorney-client privilege. There is no evidence in the hundreds of thousands of pages of documents obtained by the ISC that Mr. Joseph was retained as an attorney for Representative Cherfilus-McCormick or her campaign, nor did he provide requested information clarifying who his supposed client was or the scope of his alleged privilege. Ultimately, Mr. Joseph failed to assert a valid legal privilege as a justification for refusing to comply with the ISC's subpoenas.

I. Mr. Joseph's Relevance to the ISC's Investigation

[8] Second OCC Report and Findings ¶¶ 84-85.
[9] *See* Exhibit 1 (Statement of Alleged Violations).

During its investigation, the ISC identified Michael Joseph as an individual substantially involved in several of the allegations under review. The ISC understands Mr. Joseph to be a longtime personal friend and supporter of Representative Cherfilus-McCormick. The ISC found that Progressive People, Inc. (PPI)—of which Mr. Joseph was the President during the relevant period[10]—funneled money from a Florida corporation, Petrogaz-Haiti, S.A., LLC (Petrogaz-Haiti), to individuals and entities for the benefit of Representative Cherfilus-McCormick's 2022 re-election campaign.[11] Additionally, from February 22, 2022, until December 16, 2024, Mr. Joseph was listed on Federal Election Commission (FEC) records as treasurer of Representative Cherfilus-McCormick's Leadership PAC, Protecting Democracy.[12] The ISC also obtained evidence that Mr. Joseph was involved in Community Project Funding (CPF) requests submitted by Representative Cherfilus-McCormick's congressional office during the Fiscal Year 2023 (FY23) appropriations process.[13] To review Mr. Joseph's involvement further, the ISC sought documents and testimony from him relating to PPI, Representative Cherfilus-McCormick's 2022 re-election campaign, and the CPF requests that he promoted.

A. Progressive People, Inc. and Representative Cherfilus-McCormick's 2022 Congressional Campaign

Representative Cherfilus-McCormick was sworn in as a Member of the U.S. House of Representatives on January 18, 2022, and filed her Statement of Candidacy for re-election to Congress the following day. PPI was incorporated in the State of Florida by Mr. Joseph shortly thereafter, on February 15, 2022.[14] From its incorporation date until February 5, 2026, PPI's corporate filings identified Mr. Joseph as the President and Representative Cherfilus-McCormick's husband as the Vice-President; both are also listed as directors of the company.[15] Mr. Joseph opened a bank account in the company's name on March 7, 2022.[16] Mr. Joseph and Representative Cherfilus-McCormick's husband were the only people with access to the account.[17]

PPI was not registered with the FEC or the State of Florida as any type of political committee, and PPI never made disclosures to either regarding its spending or fundraising. According to its Articles of Incorporation, PPI's stated purpose is "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."[18] Additionally, the Articles of Incorporation stated that "[n]o substantial part of the activities of the organization shall intervene in any political campaign

[10] *See* Exhibit 2 (Articles of Incorporation for Progressive People Inc.).
[11] *See* Exhibit 1 ¶¶ 170-77. At the time, the only major source of funds to Petrogaz-Haiti was the Haitian Ministry of Economy and Finance.
[12] *See* Exhibit 3 (Statement of Organization for Protecting Democracy).
[13] *See* Exhibit 1 ¶¶ 264-275.
[14] *See* Exhibit 2.
[15] Another individual, a relative of Representative Cherfilus-McCormick's husband, was listed as Secretary and Treasurer of the organization. *See id.* The February 5, 2026, filing only identifies all three individuals as directors.
[16] *See* Exhibit 4 (PPI Bank Account Opening Documents).
[17] *See id.*
[18] Exhibit 2. *But see* Exhibit 4 (indicating the principal line of business was for "Child and Youth Services" with a further description of "Voting Outreach").

on behalf of any candidate for public office."[19]

PPI disbursed hundreds of thousands of dollars to individuals and entities in support of Representative Cherfilus-McCormick's 2022 re-election campaign. The majority of PPI's funds were transferred to Truth & Justice, Inc. (T&J), beginning in July 2022.[20] T&J was incorporated on August 27, 2021; its director testified to the ISC that T&J was "[b]asically . . . a fund created to facilitate [Representative Cherfilus-McCormick's] campaign."[21] From July 2022 through the general election on November 8, 2022, PPI gave T&J $666,000.00 through nine payments, which accounted for approximately 90 percent of T&J's funding during this period.[22] PPI also sent T&J $59,000.00 on November 10, 2022, two days after Representative Cherfilus-McCormick won the 2022 general election, bringing the total amount given to T&J to $725,000.00.[23] The ISC identified at least $820,000.00 that T&J paid to vendors, entities, and individuals who also provided services to Representative Cherfilus-McCormick's campaign.[24]

PPI raised the majority of its funds from corporations.[25] The primary source of PPI's funds during the 2022 general election was Petrogaz-Haiti. In 2022, out of PPI's approximately $914,000.00 of incoming funds, $670,000.00, or about 73 percent, came from Petrogaz-Haiti, and an additional $140,000.00, or roughly 15 percent of incoming funds, came from Petrogaz-Haiti's owner.[26] PPI received its first significant deposit for $50,000.00 from Petrogaz-Haiti on April 29, 2022.[27] The ISC received evidence that four days prior, on April 25, 2022, Petrogaz-Haiti hosted a reception for Representative Cherfilus-McCormick, and that Representative Cherfilus-McCormick met personally with Petrogaz-Haiti's owner and his wife prior to the reception for a "meet and greet" organized by Mr. Joseph.[28] Bank records reviewed by the Committee indicate that checks from Petrogaz-Haiti appear to have been deposited into PPI's account by Mr. Joseph.[29]

From February 22, 2022, to December 16, 2024, Mr. Joseph also served as treasurer of Representative Cherfilus-McCormick's Leadership PAC, Protecting Democracy.[30] Protecting Democracy reported that it received $13,300.00 in contributions and made $5,000.00 in disbursements to the FEC between July 2022 to October 2024.[31] Protecting Democracy's bank statements show that some contributions were not reported or were misreported.[32]

[19] Exhibit 2.
[20] *See* Exhibit 1 ¶ 170.
[21] *Id.* ¶ 154.
[22] *See id.* ¶ 170.
[23] *See id.* ¶ 170.
[24] *Id.* ¶ 187.
[25] The ISC's findings include evidence that at least some of those funds were specifically intended to benefit Representative Cherfilus-McCormick's campaign. For example, the ISC found that, in June 2022, PPI deposited a $1,000.00 check from a limited liability company in North Miami, dated April 30, 2022, with the memo line "Sheila Campaign." *See id.* ¶ 180.
[26] *See* Exhibit 1 ¶ 176-77.
[27] *See id.* ¶ 170.
[28] *See id.* ¶ 178.
[29] *See* Exhibit 5 (Excerpt of PPI Bank Account Deposit Records).
[30] *See* Exhibit 3.
[31] *See* Exhibit 1 ¶ 265.
[32] *See id.* ¶ 265.

B. Community Project Funding Requests

The ISC obtained evidence that Mr. Joseph exerted significant influence over the CPF requests that Representative Cherfilus-McCormick submitted to the Committee on Appropriations (Appropriations) for FY23, specifically directing congressional staff to submit projects he recommended. The CPF process enables Members to advocate for projects run by government entities and non-profit organizations; federal funds are allocated to programs selected by Appropriations.[33] For FY23, Representative Cherfilus-McCormick's congressional office accepted CPF requests beginning on April 4, 2022. The ISC found evidence that, on April 12, 2022, a staff member for Representative Cherfilus-McCormick attended a meeting in her campaign office with Mr. Joseph and another individual, during which Mr. Joseph and the other individual "ordered" the staff member to submit certain CPF requests to Appropriations.[34] When making recommendations to Representative Cherfilus-McCormick on which CPF requests to pursue, the staff member emailed a document specifically denoting organizations recommended by Mr. Joseph.[35] According to the ISC's findings, the staff member expressed concerns about several organizations and/or projects Mr. Joseph promoted, and informed the Congresswoman that at least one such project looked "fictitious."[36] When the project that appeared "fictitious" was excluded from the Congresswoman's submission to Appropriations, Mr. Joseph called Representative Cherfilus-McCormick's congressional staff to complain.[37] The ISC found that, later that day, Representative Cherfilus-McCormick called the staff member and informed her that Mr. Joseph was Representative Cherfilus-McCormick's friend, he "was not going anywhere," and that she needed to apologize to Mr. Joseph.[38]

II. The ISC's Efforts to Obtain Documents and Testimony from Mr. Joseph

A. Requests for Information

On June 26, 2024, the ISC sent a voluntary Request for Information (RFI) to Mr. Joseph, related to CPF requests supported by Representative Cherfilus-McCormick's congressional office, contributions to Representative Cherfilus-McCormick's affiliated political committees by Mr. Joseph or entities he owned or controlled, and communications between Mr. Joseph and certain individuals related to Representative Cherfilus-McCormick, her congressional office, her affiliated political committees, or any CPF requests.[39] The ISC also sent an RFI to PPI, addressed to Mr. Joseph (PPI's President), seeking information related to PPI's corporate records and records related to Representative Cherfilus-McCormick's campaign, entities owned or controlled by Representative Cherfilus-McCormick, and T&J.[40] Committee staff transmitted both RFIs to Mr.

[33] *See* Comm. on Appropriations, *FY26 Community Project Funding* (last visited Feb. 19, 2026), https://appropriations.house.gov/fy26-member-requests/fy26-community-project-funding.
[34] *Id.* ¶ 267.
[35] *See id.* ¶ 268.
[36] *id.* ¶ 270.
[37] *See id.* ¶ 272.
[38] Exhibit 1 ¶ 272.
[39] *See* Exhibit 6 (Request for Information from ISC Chairman Andrew R. Garbarino and ISC Ranking Member Chrissy Houlahan to Michael Joseph (June 26, 2024)).
[40] *See* Exhibit 7 (Request for Information from ISC Chairman Andrew R. Garbarino and ISC Ranking Member Chrissy Houlahan to Progressive People, Inc. (June 26, 2024)).

Joseph at an email address he was known to use in 2022 and 2023. Committee staff followed up at the same email address three more times—on July 9, July 22, and August 7, 2024—noting in multiple emails that the ISC may subpoena the records if he did not cooperate. In July and August 2024, Committee staff also made numerous unsuccessful attempts to contact Mr. Joseph by phone on his personal cell phone, as well as at his municipal office and law firm, and left at least two voicemails for him. Not once did Mr. Joseph respond. Committee staff then forwarded the correspondence on August 15, 2024, to Mr. Joseph's municipal email address.[41]

Having received no acknowledgement of an intent to respond from Mr. Joseph, on September 26, 2024, Committee staff informed Mr. Joseph at his personal, municipal, and law firm email addresses that the ISC had determined to serve him with subpoenas for documents.[42] The Committee finally received a response from Mr. Joseph that same day. Mr. Joseph asserted that the "request appears to be linked to my legal practice/representation. For future reference, please mail your request to my law firm physical address detailed below. I will review the request once I have received it and provide a response if any."[43]

B. Subpoenas

The ISC then emailed two subpoenas *duces tecum* to Mr. Joseph on September 26, 2024, one addressed to him and one addressed to PPI, compelling the production of documents by October 21, 2024.[44] Each of these subpoenas sought the same information as the RFIs previously sent to Mr. Joseph.

In a September 30, 2024 email to Committee staff, Mr. Joseph asserted that the previously transmitted RFIs had been sent to email addresses that he could not easily access or were caught by spam filters, and further claimed that he was unable to locate missed calls or voicemails from Committee staff.[45] Regarding the subpoena for documents personally in his possession, Mr. Joseph asserted he had "conducted a diligent search and reasonable inquiry" and was "currently unable to comply with this demand because no such document(s) exist and/or ever existed."[46] Regarding the subpoena to PPI, despite having clearly received and reviewed it, Mr. Joseph requested that a copy be provided to him again via service by the United States Marshals Service (Marshals) at the law firm at which he is employed; the Committee obliged and the Marshals effected such service on October 8, 2024.[47]

Despite Mr. Joseph's perfunctory denial, the ISC had reason to believe he did have documents responsive to the subpoena sent to him in his personal capacity based on other evidence it had gathered, including bank records, emails, text messages, and WhatsApp messages involving

[41] *See* Exhibit 8 (Emails between Committee staff and Michael Joseph (June 26, 2024, to Oct. 22, 2024)).
[42] *See id.*
[43] *Id.*
[44] *See id.*; *see also* Exhibit 9 (Subpoena *Duces Tecum* to Michael Joseph (Sept. 24, 2024)); Exhibit 10 (Subpoena *Duces Tecum* to Progressive People, Inc. (Sept. 24, 2024)).
[45] *See* Exhibit 8.
[46] *Id.*
[47] *See id.*

Mr. Joseph, as well as based on his integral role in various areas under investigation. Consequently, on October 2, 2024, Committee staff informed Mr. Joseph that the ISC had reason to believe he had responsive documents related to the subpoena directed to him and detailed the types of documents that would be responsive to the subpoena, including:

> copies of a check or bank statement showing your contributions to Representative Cherfilus-McCormick's campaign and related communications about such contributions; calendar entries for meetings related to community project funding requests; text messages and emails with Representative Cherfilus-McCormick or anyone working with her about fundraisers and other campaign activities; informational materials that you reviewed or provided about community project funding requestors; *etc.*[48]

Committee staff also informed him that, if he was unable to produce the types of documents identified, he should provide an explanation of why he was unable to do so by October 16, 2024.[49] Mr. Joseph did not provide any further explanation for why the documents could not be produced—in fact, he did not respond to Committee staff for over a year after this correspondence.

On October 15, 2024, PPI, through counsel, sought an extension of time to respond to the subpoena, and was granted an additional three weeks to comply.[50] PPI's counsel later clarified that she only represented PPI and not Mr. Joseph. Committee staff followed up with Mr. Joseph by email on October 22, 2024, noting that "the subpoena from the ISC to you in your personal capacity remains outstanding."[51] Mr. Joseph did not respond to this email, nor any other outreach by Committee staff, during the remainder of the 118th Congress.

On November 13, 2024, PPI produced a total of 27 pages of documents,[52] as well as a certification, signed by Mr. Joseph and dated November 12, 2024, asserting that "a diligent search of all documents in the possession, custody, or control of the Corporation which reasonably could contain responsive documents has been completed, and all documents located during the search that are responsive have been produced to the Committee."[53] PPI did not assert any legal privileges preventing it from producing responsive documents.

PPI's production did not include any emails, transaction records, or *any* records relating to Representative Cherfilus-McCormick's campaign committees or her companies.[54] On November 18, 2024, PPI's counsel informed Committee staff that "if there were any emails or text messages,

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[48] *Id.*
[49] *See id.*
[50] *See* Exhibit 11 (Emails between Committee staff and Counsel to Progressive People, Inc. (Oct. 15, 2024, to Sept. 2, 2025)).
[51] *Id.*
[52] *See* Exhibit 12 (Letter from Counsel to Progressive People, Inc. to Committee staff (Nov. 12, 2024).
[53] Exhibit 13 (Progressive People, Inc. Certification (Nov. 12, 2024)).
[54] *See* Exhibit 12.

they were not retained and were instead disregarded [sic] in the usual course of business prior to the Committee's request."[55]

Additionally, on November 13, 2024, Committee staff notified counsel to PPI that the ISC would seek Mr. Joseph's testimony about both personal matters and matters relating to his capacity as President of PPI.[56] On December 4, 2024, counsel to PPI informed Committee staff that, "[d]ue to his recent election as mayor and duties related to that, Mr. Joseph says he's unavailable until after the end of the year, and he prefers that Progressive People, Inc. receive a [testimonial] subpoena."[57] Later, Committee staff contacted PPI's counsel in the 119th Congress after the ISC was re-impaneled but were informed that they no longer represented PPI.[58] No other counsel has responded on behalf of PPI.

Once the ISC was reestablished in the 119th Congress, it served Mr. Joseph with another subpoena for documents on August 12, 2025, with a return date of September 9, 2025; this subpoena sought the same documents as the RFI and subpoena issued in the 118th Congress.[59] Mr. Joseph did not produce documents or otherwise respond to the subpoena. After receiving no response to the subpoena *duces tecum*, the ISC determined to reissue the subpoena at the same time it issued a subpoena for Mr. Joseph's testimony; the testimonial subpoena was issued due to the request for a testimonial subpoena from PPI's counsel. On September 11, 2025, Mr. Joseph was served by email with the reissued subpoena for documents, which had a return date of September 30, 2025, and with a subpoena compelling his testimony on October 7, 2025, at 10:00 a.m. in 1015 Longworth House Office Building.[60]

After Mr. Joseph received these subpoenas, he contacted an attorney. On September 12, 2025, Committee staff received an email from the attorney stating that the September 11, 2025 email with the subpoenas was forwarded to him by Mr. Joseph's "office for response," but the attorney was not formally appearing as counsel to Mr. Joseph.[61] The attorney requested that this matter be postponed until Mr. Joseph's return from travel in early October.[62] His email further stated that "Mr. Joseph, as an attorney, believes that an attorney/client privilege applies to the matters under investigation."[63] The ISC accommodated the request, providing Mr. Joseph with a two-week extension, until October 14, 2025, to respond to the document subpoena.[64] Committee staff also informed Mr. Joseph and the attorney that, with respect to Mr. Joseph's apparent privilege claim, Committee Rules provide that the presiding member of the ISC may consider objections based on privilege; staff requested that Mr. Joseph provide any objections to the

[55] Exhibit 11.
[56] *See* Exhibit 11.
[57] *Id.*
[58] *See id.*
[59] *See* Exhibit 14 (Subpoena *Duces Tecum* to Michael Joseph (Aug. 12, 2025)).
[60] *See* Exhibit 15 (Subpoena *Duces Tecum* to Michael Joseph (Sept. 11, 2025)); Exhibit 22 (Subpoena *Ad Testificandum* to Michael Joseph (Sept. 11, 2025)).
[61] Exhibit 16 (Emails between Committee staff and Attorney on Behalf of Michael Joseph (Sept. 12, 2025, to Oct. 6, 2025)).
[62] *See id.*
[63] *Id.*
[64] *See id.*

subpoenas in writing by October 3, 2025.[65] The ISC further offered to reschedule Mr. Joseph's subpoenaed testimony if he would provide a date and time for his appearance that was agreeable to the ISC.[66] Mr. Joseph did not provide alternative dates for his testimony, failed to appear before the ISC for his deposition on October 7, 2025, did not provide any written objections by October 3, 2025, and did not produce documents by October 14, 2025.[67] In fact, neither he nor his "unofficial" attorney provided any response at all.

On November 18, 2025, the ISC Chairman and Ranking Member sent Mr. Joseph a letter informing him that the ISC was considering taking further action regarding his willful non-compliance with the subpoenas, including the invocation of contempt of Congress proceedings.[68] The letter noted that the ISC had determined Mr. Joseph had "not made a valid assertion of the attorney-client privilege," and that it viewed Mr. Joseph to be in knowing and willful non-compliance with the subpoenas.[69]

On November 25, 2025, Committee staff was contacted by a second attorney claiming that his firm had been asked to represent Mr. Joseph in the matter.[70] Through counsel, Mr. Joseph requested that the subpoenas be "re-issued" and personally served.[71] On December 1, 2025, Committee staff informed Mr. Joseph's counsel that, as a courtesy to Mr. Joseph, the Chairman and Ranking Member agreed to re-issue the subpoenas, which would be returnable on December 5, 2025.[72] Committee staff emailed copies of the subpoenas to counsel on December 3, 2025, and informed counsel that personal service by the Marshals would be made the next day.[73] On December 4, 2025, the Marshals attempted to serve Mr. Joseph multiple times but were unable to do so, as he had left the state.[74]

Although Mr. Joseph was not served by the Marshals, Committee staff reminded counsel that the re-issuance and attempt at personal service of the subpoenas was a courtesy, that the ISC considered the subpoenas to have been duly served since September, and that the ISC expected Mr. Joseph to comply by the December 5, 2025, deadline.[75] Counsel objected by email on December 4, 2025, "on various grounds, including personal conflicts, as well as the lack of service of process of the subpoena," and requested that any questioning be by remote method.[76] Committee staff responded the same day, informing counsel that the Marshals' "attempt to serve

[65] *See id.*
[66] *Id.*
[67] *See* Exhibit 23 (Michael Joseph Deposition Transcript (Oct. 7, 2025)).
[68] *See* Exhibit 17 (Letter from ISC Chairman Andrew R. Garbarino and ISC Ranking Member Chrissy Houlahan to Michael Joseph (Nov. 18, 2025)).
[69] *Id.* Mr. Joseph had previously been informed of the potential consequences of his non-compliance. *See* Exhibit 8 ("If the ISC believes you have intentionally failed to comply with its subpoena, it may determine to refer you to the full Committee to consider whether to hold you in contempt of Congress, which may result in criminal charges against you pursuant to 2 U.S.C. § 192.").
[70] *See* Exhibit 18 (Emails between Committee staff and Counsel to Michael Joseph (Nov. 25, 2025, to Dec. 1, 2025)).
[71] *Id.* Counsel did not provide a reason for why Mr. Joseph insisted on personal service.
[72] *See id. See also* Exhibit 19 (Subpoena *Duces Tecum* to Michael Joseph (Dec. 3, 2025)); Exhibit 24 (Subpoena *Ad Testificandum* to Michael Joseph (Dec. 3, 2025)).
[73] Exhibit 20 (Emails between Committee staff and Counsel to Michael Joseph (Dec. 3, 2025, to Dec. 4, 2025)).
[74] *See id.*; *see also* Exhibit 21 (Michael Joseph Deposition Transcript (Dec. 5, 2025)).
[75] *See* Exhibit 20.
[76] *Id.*

Mr. Joseph in person were [] done as a courtesy" but "neither House nor Committee Rules require" personal service.[77] Additionally, the email noted "[a]s previously offered, the ISC is willing to accommodate an alternate date for Mr. Joseph's subpoenaed testimony," but that Mr. Joseph had not provided any such date.[78] Committee staff informed Mr. Joseph's counsel that, unless he was able to provide dates and times that Mr. Joseph would be available for a deposition the week of December 8th by the next day, the ISC would be moving forward with the deposition as scheduled.[79] Committee staff also informed counsel that "[t]he ISC will agree to hold the deposition remotely per your request, including if Mr. Joseph makes himself available to provide testimony tomorrow."[80]

Mr. Joseph did not produce any documents or provide the ISC with either written objections or any response to the documentary subpoena. On December 5, 2025, Mr. Joseph failed to appear before the ISC pursuant to the testimonial subpoena.[81] To date, he has not provided a sufficient legal basis for failing to appear.

ISC RECOMMENDATION

Mr. Joseph's failure to appear or produce documents in response to the ISC's subpoenas is egregious and warrants a referral to the U.S. Department of Justice for contempt of Congress. Therefore, on December 16, 2025, the ISC took the extraordinary step of voting pursuant to Committee Rule 19(c)(3) to refer Mr. Joseph to the full Committee for contempt and on March 18, 2026, adopted this Report in support thereof.

An individual who fails or refuses to comply with a House subpoena may be cited for contempt of Congress.[82] Pursuant to 2 U.S.C. § 192, the willful refusal to comply with a congressional subpoena is punishable by a fine of up to $100,000 and imprisonment for up to one year. A committee may vote to seek a contempt citation against a recalcitrant witness. This action is then reported to the House. If a contempt resolution is adopted by the House, the matter is referred to a U.S. Attorney, who has a duty to refer the matter to a grand jury for an indictment.[83]

The ISC determined that Mr. Joseph's testimony and production of documents were necessary to its investigation in both the 118th and 119th Congresses and issued him duly authorized subpoenas in accordance with House and Committee Rules. As explained in detail above, Mr. Joseph was intricately involved in the allegations under review by the ISC. His refusal to provide information to the ISC created unnecessary delays and limited the ISC's ability to fully investigate allegations of misconduct relating to a Member of Congress. Further, his refusal to provide any information to the ISC has no legal basis. Such complete refusal to comply with lawful subpoenas—or to even negotiate in good faith to determine a mutually agreeable date to testify or produce any documents whatsoever—has hampered the Committee's ability to carry out its functions.

[77] *Id.*
[78] *Id.*
[79] *Id.*
[80] *Id.* Mr. Joseph's counsel did not respond.
[81] Exhibit 21.
[82] *See Eastland v. United States Servicemen's Fund*, 421 U.S. 491, 515 (1975).
[83] *See* 2 U.S.C. § 194.

Mr. Joseph's asserted reasons for not complying with the subpoenas were that the information sought by the ISC was covered by attorney-client privilege because "Mr. Joseph[] [is] an attorney" and because he was not served in person in the current Congress; neither of these assertions provide a valid legal basis for failing to comply with the subpoenas. When Mr. Joseph first made his one-sentence attorney-client privilege assertion, nearly one year after receiving the initial documentary subpoena, Committee staff explained that the presiding member of the ISC could consider his objection, pursuant to Committee Rule 19(c). Committee staff therefore requested that Mr. Joseph submit any objections to the subpoenas in writing by October 3, 2025, for the ISC Chairman's consideration under Rule 19(c) and sections 9 and 10 of the subpoena instructions[84]; Mr. Joseph did not do so. As noted in the ISC's November 18, 2025, letter to Mr. Joseph:

> [T]he only information the ISC has received from you regarding your asserted attorney-client privilege is the single sentence in [the attorney's] email. Nonetheless, the ISC has considered your privilege assertion. The single sentence . . . did not identify a specific client whose communications with you would be protected nor address why responsive documents other than confidential communications would fall under the privilege. Additionally, the ISC is not aware of any evidence that you or your firm were either consulted for the purposes of obtaining legal services or in fact did provide legal services to entities or individuals within the scope of the ISC's subpoena. The ISC has determined that you have not made a valid assertion of the attorney-client privilege.[85]

[84] *See, e.g.*, Exhibit 9; Exhibit 14; Exhibit 19. Section 9 states:

> If you assert that compliance with the subpoena cannot be made in full, compliance shall be made to the extent possible and shall include an explanation of why full compliance is not possible. Failure to provide an explanation by the subpoena's return date constitutes a waiver of any objections to the subpoena.

Section 10 states:

> In the even a document is withheld, in whole or in part, based on a claim of privilege or attorney work product protection, provide the following information concerning any such document: (a) the privilege(s) or protection(s) asserted; (b) the type of document(s); (c) the general subject matter of the document(s); (d) the date(s), author(s), and recipient(s) of the document(s); and (e) the relationship between the author(s) and recipient(s) of the document(s). Any claims of privilege or attorney work product protection are waived if you fail to provide an explanation of why full compliance is not possible and log identifying with specificity the ground(s) for withholding each document prior to the subpoena compliance date.

[85] Exhibit 17.

Mr. Joseph's counsel, retained following this letter, suggested that Mr. Joseph could not even identify the client due to Rule 4-1.6 of the Florida Bar Rules of Professional Conduct. Specifically, counsel asserted:

> As observed in previous correspondence, Michael Joseph is a practicing Florida attorney subject to Rule 4-1.6 of the Rules of Professional Conduct. Those rules make it clear that he has a duty of confidentiality that is often much broader than the attorney-client privilege. Absent informed consent, which is not present here, and subject to several exceptions that are also inapplicable, he "...must not reveal information relating to a client's representation..." Rule 4-1.6(a). Because a voluntary disclosure is not authorized, he is obliged to require a properly served subpoena before he can respond to inquiries about prior or existing representations. We note that the subpoenas that I received as courtesy copies designated service by the U.S. Marshal. Because personal service as designated was not effected, Mr. Joseph takes the position that service was not valid. Moreover, if proper service were waived without the client's consent, such might well make ensuing communications about a representation voluntary and, thus, potentially a violation of the Rules of Professional Conduct.[86]

However, the comment to Rule 4-1.6 states, "[t]he attorney-client privilege applies in judicial and other proceedings in which a lawyer may be called as a witness or otherwise required to produce evidence concerning a client. The rule of client-lawyer confidentiality applies in situations other than those where evidence is sought from the lawyer through compulsion of law." Subpoenas issued by Congress clearly meet the burden of "through compulsion of law." Ultimately, the mere assertion of attorney-client privilege without providing more information, as required under Committee Rule 19 and the subpoenas themselves, is an insufficient basis for Mr. Joseph's failure to comply with the ISC's subpoenas. Moreover, no Rule of the House of Representatives requires that Congress effect personal service. Mr. Joseph had notice of and was properly served the subpoenas issued by the ISC: he responded on September 30, 2024, to the September 26, 2024, subpoena[87]; he had an attorney respond on September 12, 2025, to the September 11, 2025, subpoenas[88]; and his attorneys were in receipt of the December 3, 2025, subpoenas.[89] Mr. Joseph and his counsel were repeatedly informed that personal service was a courtesy and that Congressional subpoenas do not require personal service.[90] Mr. Joseph does not deny that he received the ISC's subpoenas in a timely manner, only that he was not served in the manner he preferred. Thus, Mr. Joseph's arguments for his noncompliance are unpersuasive.

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[86] Exhibit 18.
[87] The Marshals served Mr. Joseph with this subpoena on October 8, 2024, as a courtesy and at his request. *See* Exhibit 8.
[88] The ISC also requested Mr. Joseph inform it if he wanted to be personally served, but neither Mr. Joseph nor the attorney who responded on his behalf requested such service. *See* Exhibit 16.
[89] When these subpoenas were re-issued at Mr. Joseph's request, the ISC reiterated that they considered them to have been served in September. Exhibit 18; Exhibit 20.
[90] *See id.*

The House cannot accept a key witness simply ignoring its subpoenas. The ISC was clear throughout its investigation that Mr. Joseph's failure to comply with its subpoenas could result in the Committee recommending the House hold him in contempt of Congress, which could result in criminal charges pursuant to 2 U.S.C. § 192.[91] Nonetheless, Mr. Joseph has willfully failed to comply with the ISC's duly issued subpoenas. It is imperative to protect the institutional interests of the House by enforcing the subpoenas through the contempt process. This serious matter requires the Committee to seek action by the full House. The ISC therefore determined that Mr. Joseph should be referred to the full Committee, and then to the full House, for contempt of Congress.

Numerous witnesses over the House's history have been cited for contempt for failing to appear to answer questions at an investigative proceeding.[92] Several contempt resolutions have been approved by the House in recent Congresses.[93] In prior Congresses, this Committee has found witnesses to be in contempt for refusing to appear or answer questions.[94]

Accordingly, on March 18, 2026, the ISC met in executive session and adopted this report for the attention of the full Committee. The ISC recommends the Committee adopt this report and submit the below proposed resolution recommending the House cite Michael Joseph for contempt of Congress pursuant to 2 U.S.C. §§ 192 and 194.

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[91] *See, e.g.*, Exhibit 8; Exhibit 16; Exhibit 17; Exhibit 20.

[92] *See generally* 4 Deschler's Precedents § 20 et al.

[93] *See, e.g.*, H. Res. 730 (117th Cong.) (Steve Bannon); H. Res. 851 (117th Cong.) (Mark Meadows); H. Res. 574 (113th Cong.) (Lois Lerner); H. Res. 711 (112th Cong.) (Eric Holder). The resolutions each stated that the witness "shall be found to be in contempt of Congress for failure to comply with a congressional subpoena." In those instances, the House specifically resolved that the Speaker shall certify the contempt report to the U.S. Attorney "[p]ursuant to 2 U.S.C. §§ 192 and 194," and that "the Speaker of the House shall otherwise take all appropriate action to enforce the subpoena."

[94] For example, in 1980, a staffer for Representative Charles Wilson failed to appear to give testimony and the Committee reported a resolution for contempt to the House, which was agreed to by voice vote; however, there is no record of an indictment against the staffer in D.C. District Court. *See* Comm. on Standards of Official Conduct, *Proceedings Against O. Robert Fordiani*, H. Rept. 96-1078, 96th Cong., 2d Sess. (1980). Additionally, during this Committee's investigation into Korean influence allegations, a witness appeared for a deposition but refused to answer a pertinent question; as a result, the Committee concluded he was in contempt, reported that finding to the House, and the contempt matter was referred by the House to the U.S. Attorney for the District of Columbia; the staffer was later indicted. *See* Comm. on Standards of Official Conduct, *Proceedings Against Hancho Kim*, H. Rept. 95-1214, 95th Cong. 2d Sess. (1978).

PROPOSED
RESOLUTION RECOMMENDING THAT THE HOUSE OF REPRESENTATIVES FIND MICHAEL JOSEPH IN CONTEMPT OF CONGRESS FOR REFUSAL TO COMPLY WITH SUBPOENAS DULY ISSUED BY THE COMMITTEE ON ETHICS

The Committee on Ethics, having considered this report, reports favorably thereon and recommends that the report be approved.

The form of Resolution that the Committee on Ethics would recommend to the House of Representatives citing Michael Joseph for contempt of Congress pursuant to this Report is as follows:

Resolved, That Michael Joseph shall be found to be in contempt of Congress for failure to comply with the subpoena *duces tecum* issued to him on September 11, 2025.

Resolved, That Michael Joseph shall be found to be in contempt of Congress for failure to comply with the subpoena *ad testificandum* issued to him on September 11, 2025.

Resolved, That pursuant to 2 U.S.C. §§ 192 and 194, the Speaker of the House of Representatives shall certify the Report of the Committee on Ethics, detailing the refusal of Michael Joseph to produce documents and appear before the Investigative Subcommittee as directed by these subpoenas, to the United States Attorney for the District of Columbia, to the end that Mr. Joseph be proceeded against in the manner and form provided by law.

Resolved, That the Speaker of the House shall otherwise take all appropriate action to enforce the subpoenas.

APPENDIX A

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 reported 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, responsives [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 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

EXHIBIT 3

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FEC FORM 1

STATEMENT OF ORGANIZATION

Office Use Only

1. NAME OF COMMITTEE (in full) (Check if name is changed) Example: If typing, type over the lines. 12FE4M5

Protecting Democracy

ADDRESS (number and street) 4770 BISCAYNE BLVD STE 1400

(Check if address is changed)

MIAMI FL 33137

CITY ▲ STATE ▲ ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

(Check if address is changed) protectingdemocracypac@gmail.com

Optional Second E-Mail Address
michaeljosephpa@gmail.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address is changed)

2. DATE 02 / 22 / 2022

3. FEC IDENTIFICATION NUMBER ▶ C C00806240

4. IS THIS STATEMENT [x] NEW (N) OR [ ] AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer JOSEPH, MICHAEL, , , ESQ.

Signature of Treasurer *JOSEPH, MICHAEL, , , ESQ.* *[Electronically Filed]* Date 02 / 22 / 2022

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office Use Only				

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 06/2012)

Image# 202202229493672178

FEC **Form 1** (Revised 02/2009) Page **2**

5. TYPE OF COMMITTEE

Candidate Committee:

(a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)

(b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Candidate Party Affiliation

Office Sought: ☐ House ☐ Senate ☐ President

State

District

(c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

(d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

(e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization

☐ Membership Organization ☐ Trade Association ☐ Cooperative

☐ In addition, this committee is a Lobbyist/Registrant PAC.

(f) ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Registrant PAC.

☒ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

(g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.

(h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. FEC ID number C

2. FEC ID number C

3. FEC ID number C

4. FEC ID number C

Image# 202202229493672179

FEC **Form 1** (Revised 02/2009) Page **3**

Write or Type Committee Name

Protecting Democracy

6. **Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor**

CHERFILUS-MCCORMICK, SHEILA, , ,

Mailing Address 18612 SW 41ST STREET

MIRAMAR FL 33029

CITY STATE ZIP CODE

Relationship: [ ] Connected Organization [ ] Affiliated Committee [ ] Joint Fundraising Representative [x] Leadership PAC Sponsor

7. **Custodian of Records:** Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name JOSEPH, MICHAEL, , , ESQ.

Mailing Address 4770 BISCAYNE BLVD STE 1400

MIAMI FL 33137

Title or Position CITY STATE ZIP CODE

CHAIR Telephone number 786 - 897 - 3773

8. **Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer JOSEPH, MICHAEL, , , ESQ.

Mailing Address 4770 BISCAYNE BLVD STE 1400

MIAMI FL 33137

CITY STATE ZIP CODE

Title or Position

Telephone number 786 - 897 - 3773

Image# 202202229493672180

FEC Form 1 (Revised 02/2009) Page 4

Full Name of Designated Agent: JOSEPH, MICHAEL, , , ESQ.

Mailing Address: 4770 BISCAYNE BLVD STE 1400

MIAMI | FL | 33137

CITY | STATE | ZIP CODE

Title or Position

Telephone number

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

TD BANK

Mailing Address: 9005 BISCAYNE BLVD

MIAMI | FL | 33138

CITY | STATE | ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY | STATE | ZIP CODE

EXHIBIT 4

Certification Regarding Beneficial Owners of Legal Entity Customers

TD Bank

For TD Personnel use only	
Account Number: [redacted] 9455	Date: 3/7/2022
TD Bank Representative Name: [redacted]	TD Bank Representative Phone: [redacted]
RC Code (if applicable): 4876	Store Number (if applicable): 4876

Account Opening/Maintenance Information

A. Name and Address of Legal Entity for which an account is being opened or Business Relationship is being updated

Name: Progressive People Inc	
Address: 4770 Biscayne Blvd #1400	City/State/Zip: Miami, FL 33137

B. Name and Title of Natural Person opening account or updating the Business Relationship

Name: Mike Joseph	Title: Director

I. Certification of Individual with Control (see page 4 for definition)

Individual First Name: Mike	Middle Initial:	Last Name: Joseph
Street Address (no PO Boxes): 4770 Biscayne Blvd #1400		City: Miami
State/Province: FL	Zip/Postal Code: 33137	Country: USA
Social Security Number (SSN) (US persons only): [redacted]		Date of Birth: [redacted]
Title (CEO, President, etc.): Director		

Non-US persons, please complete the fields below

Primary ID Type (passport or other):		Number:
Country:	Date of Issuance:	Exp. Date:

Is this individual with Control also a Beneficial Owner? ☑ Yes ☐ No If yes, what is the percentage of ownership? 100 %

II. Certification of Beneficial Owner(s) (see page 4 for definition)

If no individual meets this requirement, please check "Beneficial Owner Not Applicable" box and move to Section III. ☐ Beneficial Owner Not Applicable

Beneficial Owner 1 Information:

Individual First Name:	Middle Initial:	Last Name:	
Street Address (no PO Boxes):		City:	
State/Province:	Zip/Postal Code:	Country:	
Social Security Number (SSN) (US persons only):	Date of Birth:	% of Ownership: %	

Non-US persons, please complete the fields below

Primary ID Type (passport or other):		Number:
Country:	Date of Issuance:	Exp. Date:

Does the individual hold the ownership interest in the Legal Entity indirectly (via an ownership interest in an intermediate company)? ☐ Yes ☐ No
If yes, provide the name of the intermediate company below:

Name of Company with Ownership Interest in this Relationship:

II. Certification of Beneficial Owner(s) (cont.)

Beneficial Owner 2 Information:

Individual First Name:	Middle Initial:	Last Name:
Street Address (no PO Boxes):		City:
State/Province:	Zip/Postal Code:	Country:
Social Security Number (SSN) (US persons only):	Date of Birth:	% of Ownership: %

Non-US persons, please complete the fields below

Primary ID Type (passport or other):		Number:
Country:	Date of Issuance:	Exp. Date:

Does the individual hold the ownership interest in the Legal Entity indirectly (via an ownership interest in an intermediate company)? ☐ Yes ☐ No
If yes, provide the name of the intermediate company below:

Name of Company with Ownership Interest in this Relationship:

Beneficial Owner 3 Information:

Individual First Name:	Middle Initial:	Last Name:
Street Address (no PO Boxes):		City:
State/Province:	Zip/Postal Code:	Country:
Social Security Number (SSN) (US persons only):	Date of Birth:	% of Ownership: %

Non-US persons, please complete the fields below

Primary ID Type (passport or other):		Number:
Country:	Date of Issuance:	Exp. Date:

Does the individual hold the ownership interest in the Legal Entity indirectly (via an ownership interest in an intermediate company)? ☐ Yes ☐ No
If yes, provide the name of the intermediate company below:

Name of Company with Ownership Interest in this Relationship:

Beneficial Owner 4 Information:

Individual First Name:	Middle Initial:	Last Name:
Street Address (no PO Boxes):		City:
State/Province:	Zip/Postal Code:	Country:
Social Security Number (SSN) (US persons only):	Date of Birth:	% of Ownership: %

Non-US persons, please complete the fields below

Primary ID Type (passport or other):		Number:
Country:	Date of Issuance:	Exp. Date:

Does the individual hold the ownership interest in the Legal Entity indirectly (via an ownership interest in an intermediate company)? ☐ Yes ☐ No
If yes, provide the name of the intermediate company below:

Name of Company with Ownership Interest in this Relationship:

III. Certified/Agreed To

☑ Check this box if there have been no updates or changes to Individual with Control or Beneficial Ownership Information since last completing a Certification Form.

I, Mike Joseph, hereby certify, to
(Print Name of person opening the account or adding new accounts or services to an established relationship)

the b[redacted]mation provided above is complete and correct.

Signa[redacted]
X[redacted] Date 3 7 2022

TD Bank
America's Most Convenient Bank

ASSESSING YOUR NEW BUSINESS ACCOUNT

TO BE COMPLETED FOR ALL NEW BUSINESS ACCOUNTS

SECTION 1A: STORE/ACCOUNT INFORMATION
TO BE COMPLETED DAY OF ACCOUNT OPENING (Fill in or CIRCLE answer for each question)

Store Employee: [redacted]
Store Location: Miami Gardens Northeast
Product Type: TD Business Simple Checking
Account Title: PROGRESSIVE PEOPLE INC

Date Opened: 03/07/2022
Store Number: 4876
Account Number: [redacted]9465
Phone Number:
Best Time to Contact: Evenings

Primary Contact Name: MIKE JOSEPH
Legal Address: 4470 BISCAYNE BLVD STE 1400
MIAMI FL 33137
Business Email Address: [redacted]@GMAIL.COM
New or Existing TD Business Customer: New Existing
Home Based: Yes No

SECTION 1B: BUSINESS INFORMATION
TO BE COMPLETED DAY OF ACCOUNT OPENING (Fill in or CIRCLE answer for each question)

Is the business location at the same address being used to establish account? ☒ Yes ☐ No
If No, please explain:
Type of Business (Circle one): Corporation Partnership LLC LLP Sole Proprietor
Non-Profit Government/Municipal Other (Describe)
Principle Line of Business: Child and Youth Services
If "Other", describe: VOTING OUTREACH
Purpose of account (payroll, escrow, operating account, etc): Operating
Length of time in business: > 24 months
Does it match the formation documents? Yes No
If No, please explain:
Estimated Annual Sales: $0 - $500,000
Number of Employees: 2
Business geographical area coverage: In TD Market Area
Is the Business located within market? Yes No
If No, please explain:
How is the business paid by its customers? ACH/ CHECK
What types of customers/vendors will the business be working with? VOTERS AND POLITICAL PARTIES
Where does the business maintain merchandise or equipment? OFFICE

SECTION 1C: HOME BASED BUSINESS
TO BE COMPLETED DAY OF ACCOUNT OPENING (Fill in or CIRCLE answer for each question)

Does the home address provided match the identification of owner? Yes No
If No, please explain:
How long have you lived at your current address? Do you own or rent? Own Rent

For all home based businesses provide 4 or more items from below checklist (check all that apply)

Documents must be sent to CIF with account package (exception- do not photo copy driver's license)

- ☐ Known/Existing Customer for more than 6 months
- ☐ Business open more than 6 months. If so, how was this verified?
- ☐ Has license for trade business (day care, architect, plumber, electrician etc.) or Sales tax usage doc
- ☐ Has Commercial vehicle registration with address that matches business/home address
- ☐ Business is listed on Home Advisor with matching contact information
- ☐ Has invoice or bill mailed to address in business name or in the name of the business owner
- ☐ If property is rented, provide copy of rental agreement
- ☐ If owned, has tax bill, mortgage statement or other means of ownership verification (town tax list online, etc.)
- ☐ Driver's license matches address given (do not photocopy)
- ☐ Website exists and matches information given (provide screenshot)
- ☐ IRS TIN Letter
- ☐ Personal paystub with home address
- ☐ Most recent personal tax return
- ☐ Vehicle Registration
- ☐ Vehicle Insurance with home address
- ☐ Verification from State Website
- ☐ Bank Statement from other banks previous 2 months of activity
- ☐ W2s

SECTION 1D: TO BE COMPLETED DAY OF ACCOUNT OPENING

BUSINESS ACCOUNT OPENING DOCUMENT CHECKLIST

Account opener MUST initial each box within a column to evidence each document collected. Any deviations from the required documentation described below should be **Bumped Up!**

= Document required

= Document required if operating a Home Based Business

= Document not required

	Corporation	LLC	Partnership (including Partnership, LP and LLP)	Unincorporated Association / Not for Profit	Sole-Prop
Articles of Incorporation/Organization (filed with the state) OR Certificate of Good Standing (issued by state or court) OR State website report					
TD General Business Resolution					
Fictitious Name Registration (if applicable by state, county, or local registrar)					
Operating Agreement (if applicable)					
Board of Director's Resolution/By-Laws (if applicable)					
Partnership Banking Agreement (if applicable)					
Chapter and Bylaws of Association **OR** copy of minutes of last meeting with new elected officers (if applicable)					
FOR HOME BASED BUSINESSES, COLLECT **FOUR** ITEMS FROM THE LIST IN SECTION 1C)					
Business Site Visit form					
Signed Beneficial Ownership Long Form					

SECTION 2: REVIEW OF NEW ACCOUNT PRODUCT, FORMS AND OPENING DEPOSIT TO BE COMPLETED DAY OF ACCOUNT OPENING (Fill in or CIRCLE answer for each question)

Review of Existing Accounts your Customer may have:

Does the signer's signature match identification and any existing signature cards found on FileNet? ~~YES~~ NO N/A

Are there holds or special instructions on any existing accounts? YES NO N/A

Length of Business Account Relationship? ________ Length of Personal Account Relationship? ________

Review of the Opening Deposit:

How is the opening deposit being made? CHECK CASH TRANSFER *(Circle all that apply)*

If Cash is being deposited - does it make sense for how the business gets paid? ________

If a Check is deposited - is the check payable to the name of the business? ~~YES~~ NO N/A

Was the Starter Kit Deposit Ticket used for the opening deposit? YES NO ~~N/A~~

Was the minimum opening deposit made (based on product type)? YES NO N/A

If no, please explain: ________

Was the check processed through Early Warning in Encore? YES NO

If yes, note any response from Early Warning: N/A

If no, please explain: ________

Is date on check prior to the date of the formation documents? If Yes, ***Bump It Up!*** YES NO N/A

Does the payee and address on the check **exactly** match the title on the account? If not, ***Bump It Up!*** YES ~~NO~~ N/A

Was the business entity registered within 15 calendar days prior to the account being established? YES NO

If Yes, ***Bump It Up*** *to your SM.*

ALERT! If there are any concerns with the account, opening deposit and/or Customer ***Bump It Up!***

SECTION 3: STORE MANAGEMENT REVIEW - To be completed by a Store Manager or ASM *other than account opener* no later than the following business day
(Fill in or circle answer for each question)

Research information about the business
Research the business (including through the internet e.g. Google, Bing).
Describe results and/or opportunities: N/A - Customer was not interested in any + products
List business website if applicable: N/A
Describe why Google Map search fit the business type: OK

Business located within the vicinity/market area of your Store? YES NO N/A
If No or N/A, describe why:

SECTION 4: THANK YOUR CUSTOMER - To be completed by a Store Manager or ASM *other than account opener* no later than the following business day
(Fill in or circle answer for each question)

Business reached via phone (using directory assistance or 411.com)? YES NO
Thank You Card mailed with Store Manager business card? YES NO
Additional comments/opportunities identified (and entered into your calendar/tickler system for follow-up):

SECTION 5: DOCUMENTATION / WRAP-UP - To be completed by a Store Manager or ASM *other than account opener* no later than the following business day
(Fill in or circle answer for each question)

Site visit form printed and time scheduled for visit? YES NO
All business documents referenced on page 2 have been collected and reviewed (per AYNB Guidelines)? YES NO
If Assessing Your Business form and/or Site Visit form was completed by a business partner or another line of business, record their name and title: N/A

After completing this checklist, reviewing documentation, and performing additional due diligence, sign and date below. Send the New Account and ALL supporting documentation to CIF for imaging. If any exceptions were made, please attach RMM email.

Reviewed by Signature: [redacted] **Date:** 3/7/2022

Print Name/Title: [redacted] ASM

Rev 07/18 | TD BANK, N.A.

EXHIBIT 5

CHECKING DEPOSIT

TD Bank

CASH / CURRENCY ▶ 150000.00

TOTAL ITEMS

DATE 5-31-22

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

TOTAL FROM OTHER SIDE ▶

NAME Michael Joseph

PLEASE PRINT

SUBTOTAL ▶

LESS CASH ▶

ACCT # [redacted]9455 $150000.00

TD Bank, N.A.

⑆5240⑈10201⑆

Account: [redacted]455
Amount: 150,000.00
PostDate: 20220531
Tran_ID: 768372416
CheckNum: 0
DIN: 768372416
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 768372416
ECEItemSeqNum: 481919072159

481919072159 152857 20220531 000000000000000000
DDA_CREDIT JGRABSK 0.00
Miami Shores 4819 94004 4819 0008 0093

Account: [redacted]9455
Amount: 150,000.00
PostDate: 20220531
Tran_ID: 768372416
CheckNum: 0
DIN: 768372416
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 768372416
ECEItemSeqNum: 481919072159

1150

PETROGAZ-HAITI, S.A., LLC
2800
W. STATE ROAD 84
FT LAUDERDALE, FL 33312-4812

DATE 5/25/2022 63-8655/2680

PAY TO THE ORDER OF ProGressive People Inc. $ 150,000.00

One Hundred FiFty Thousand and 0/100 DOLLARS

citibank
CITIBANK, N.A.

FOR

[redacted]8125⑈

Account: [redacted]8125
Amount: 150,000.00
PostDate: 20220531
Tran_ID: 768372416
CheckNum: 1150
DIN: 768372421
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 768372421
ECEItemSeqNum: 000000768372421

[redacted]125
TRN_DEBIT JGRABSK 150000.00
Miami Shores 4819 94004 4819 0008 0093

Account: [redacted]125
Amount: 150,000.00
PostDate: 20220531
Tran_ID: 768372416
CheckNum: 1150
DIN: 768372421
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 768372421
ECEItemSeqNum: 000000768372421

CHECKING DEPOSIT

TD Bank

CASH / CURRENCY ▶

TOTAL ITEMS

DATE 6-6-22

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

TOTAL FROM OTHER SIDE ▶

NAME Progressive People inc

PLEASE PRINT

SUBTOTAL ▶

LESS CASH ▶

ACCT. # [redacted]9455

$ 200 000.00

TD Bank, N.A.

⑆5240⑈10201⑆

Account: [redacted]9455
Amount: 200,000.00
PostDate: 20220606
Tran_ID: 705731876
CheckNum: 0
DIN: 705731876
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 705731876
ECEItemSeqNum: 572522029601

RECORD OF CHECKS FOR DEPOSIT

DOLLARS CENTS

572522029601 103945 20220606 000000000000000000
DDA_CREDIT LFISPER 0.00
North Miami Biscayne 0025 94004 5725 0006 0069

CHECKS LIST SEPARATELY

ENTER TOTAL ON FRONT $

Account: [redacted]9455
Amount: 200,000,00
PostDate: 20220606
Tran_ID: 705731876
CheckNum: 0
DIN: 705731876
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 705731876
ECEItemSeqNum: 572522029601

1148

PETROGAZ-HAITI, S.A., LLC
2800
W STATE ROAD 84
FT LAUDERDALE, FL 33312-4812

DATE 5/26/2022 63-8655/2680

PAY TO THE ORDER OF PROGRESSIVE PEOPLE INC. $ 200,000.00

Two Hundred Thousand and 0/100 DOLLARS

citibank
CITIBANK, N.A.

FOR

[redacted]8125

Account: [redacted]8125
Amount: 200,000.00
PostDate: 20220606
Tran_ID: 705731876
CheckNum: 1148
DIN: 705731881
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 705731881
ECEItemSeqNum: 000000705731881

[redacted]8125
TRN_DEBIT LFISPER 200000.00
North Miami Biscayne 0025 94004 5725 0006 0069

CHECK
DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

Account: [redacted]8125
Amount: 200,000.00
PostDate: 20220606
Tran_ID: 705731876
CheckNum: 1148
DIN: 705731881
ReturnReasonCode:
ReturnReasonDescription:
Orig_DIN: 705731881
ECEItemSeqNum: 000000705731881

EXHIBIT 6

ONE HUNDRED EIGHTEENTH CONGRESS

U.S. House of Representatives

COMMITTEE ON ETHICS

Thomas A. Rust
Staff Director and Chief Counsel

Keelie Broom
Counsel to the Chairman

David Arrojo
Counsel to the Ranking Member

1015 Longworth House Office Building
Washington, D.C. 20515-6328
Telephone: (202) 225-7103
Facsimile: (202) 225-7392

June 26, 2024

CONFIDENTIAL
Michael Joseph
[redacted]@gmail.com

Dear Commissioner Joseph:

The U.S. House of Representatives Committee on Ethics (Committee) has established an Investigative Subcommittee (ISC) regarding allegations involving Representative Sheila Cherfilus-McCormick.

Because the Committee has authorized a review of these matters pursuant to Committee Rule 19, we hereby ask you not to destroy, allow to be destroyed, or alter, any documents of any kind related to the aforementioned allegations or the specific issues and requests outlined below.[1] In order to properly review this matter, at this time, the ISC seeks the following:[2]

1. All documents related to community project funding requests discussed with and/or submitted to Representative Cherfilus-McCormick's congressional office for fiscal year 2023, including, but not limited to, documents related to projects with the below entities:
   a. Hemp4Water, Inc.;
   b. Spearhead Affordable Homes of Florida;
   c. Community Brainstorming Alliance;
   d. MorseLife Health System;
   e. Haitian Lawyers Association; and/or
   f. Catholic Charities of the Archdiocese of Miami, Inc.

2. All communications with Hector Roos and/or [redacted]related to Representative Cherfilus-McCormick, her congressional office, her affiliated political committees,[3] or community project funding requests.

[1] By this letter, we also remind you of your right, pursuant to Committee Rule 26, to be represented by counsel at your own expense.
[2] The enclosed Data Delivery Standards set forth the Committee's expectations and requirements for all documents produced to the Committee in response to those requests.
[3] The term "political committees," as referenced in this letter, has the meaning set forth in 52 U.S.C. § 30101(4) and includes any political committee directly established, maintained, or controlled by Representative Cherfilus-McCormick or authorized by her pursuant to 11 C.F.R. § 102.13 to receive contributions or make expenditures on her behalf.

Commissioner Michael Joseph
Page 2

3. All documents related to any contributions by you to Representative Cherfilus-McCormick's affiliated political committees.

4. Describe the efforts you made to identify documents responsive to these requests.

We request that you provide the information and documents requested above to the ISC, along with any other information that you believe may be relevant to this matter, within 14 calendar days of the date of this letter.

The ISC appreciates your cooperation in this matter. If you have any questions concerning this matter, please contact Committee staff at (202) 225–7103.

Sincerely,

Andrew R. Garbarino
Chairman

Chrissy Houlahan
Ranking Member

Enclosure

EXHIBIT 7

ONE HUNDRED EIGHTEENTH CONGRESS

U.S. House of Representatives

COMMITTEE ON ETHICS

Thomas A. Rust
Staff Director and Chief Counsel

Keelie Broom
Counsel to the Chairman

David Arrojo
Counsel to the Ranking Member

1015 Longworth House Office Building
Washington, D.C. 20515–6328
Telephone: (202) 225–7103
Facsimile: (202) 225–7392

June 26, 2024

CONFIDENTIAL
Progressive People Inc.
c/o Michael Joseph
[redacted]@gmail.com

Dear Mr. Joseph:

The U.S. House of Representatives Committee on Ethics (Committee) has established an Investigative Subcommittee (ISC) regarding allegations involving Representative Sheila Cherfilus-McCormick.

Because the Committee has authorized a review of these matters pursuant to Committee Rule 19, we hereby ask you not to destroy, allow to be destroyed, or alter, any documents of any kind related to the aforementioned allegations or the specific issues and requests outlined below.[1] In order to properly review this matter, at this time, the ISC seeks the following from you in your capacity as President and Director of Progressive People Inc:[2]

1. From January 1, 2018, to present, all corporate records for Progressive People Inc.[3]

2. From January 1, 2018, to present, all documents related to Representative Cherfilus-McCormick's affiliated political committees.[4] This request includes, but is not limited to, any invoices, receipts, paystubs, checks, wire information, and/or bank records, relating to any transactions between Progressive People Inc. and Sheila Cherfilus-McCormick for Congress, Inc. This request also includes, but is not limited to, any correspondence related to such payments, as well as correspondence regarding campaign fundraising, operations, communications, or other campaign-related activity.

---

[1] By this letter, we also remind you of your right, pursuant to Committee Rule 26, to be represented by counsel at your own expense.
[2] The enclosed Data Delivery Standards set forth the Committee's expectations and requirements for all documents produced to the Committee in response to those requests.
[3] The term "corporate records," as used in this letter, has the meaning set forth in § 617.1601, Fla. Stat. (2023), including meeting minutes, accounting records, membership lists, articles of incorporation and bylaws.
[4] The term "political committees," as referenced in this letter, has the meaning set forth in 52 U.S.C. § 30101(4) and includes any political committee directly established, maintained, or controlled by Representative Cherfilus-McCormick or authorized by her pursuant to 11 C.F.R. § 102.13 to receive contributions or make expenditures on her behalf.

Progressive People Inc.
Page 2

3. From January 1, 2018, to present, all documents related to Representative Cherfilus-McCormick's affiliated companies.[5] This request includes, but is not limited to, documents relating to any payments received from and/or made to any such companies.

4. From January 1, 2018, to present, all documents related to Truth and Justice, Inc. This request includes, but is not limited to, documents relating to any payments received from and/or made to Truth and Justice, Inc.

5. Describe the efforts you made to identify documents responsive to these requests.

We request that you provide the information and documents requested above to the ISC, along with any other information that you believe may be relevant to this matter, within 14 calendar days of the date of this letter.

The ISC appreciates your cooperation in this matter. If you have any questions concerning this matter, please contact Committee staff at (202) 225–7103.

Sincerely,

Andrew R. Garbarino
Chairman

Chrissy Houlahan
Ranking Member

Enclosure

[5] The term "affiliated companies," as referenced in this letter, includes SCM Consulting Group LLC, EC Firm, LLC, Cherfilus & McCormick Foundation, Inc., Essential Community Health, Inc., Trinity Healthcare Services, LLC and/or any other entity known by you to be established, maintained, or controlled by Representative Cherfilus-McCormick or anyone acting on her behalf.

EXHIBIT 8

From: [redacted]
To: Michael Joseph
Cc: [redacted]; [redacted]
Subject: RE: U.S. House of Representatives - Committee on Ethics
Date: Tuesday, October 22, 2024 5:02:53 PM
Attachments: image001.png

Mr. Joseph,
We have received correspondence from Progressive People's counsel and will continue to work with them regarding that subpoena, referenced immediately below. However, the subpoena from the ISC to you in your personal capacity remains outstanding. As discussed further below, the ISC has reason to believe you have responsive documents and requested that you either provide those documents or a description of why you could not do so by October 16. We did not receive your response, and will inform the ISC that you did not provide the requested documents. As noted, the ISC may determine to refer you to the full Committee to consider whether to hold you in contempt of Congress, which may result in criminal charges against you pursuant to 2 U.S.C. § 192. We remain available to discuss the subpoena issued to you.
Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted]
Sent: Tuesday, October 8, 2024 3:45 PM
To: Michael Joseph
Cc: [redacted]; [redacted]
Subject: RE: U.S. House of Representatives - Committee on Ethics
Mr. Joseph,
The subpoena to Progressive People Inc. was served at your law firm's office today. The subpoena requires a response by **October 21, 2024**.
Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted]
Sent: Wednesday, October 2, 2024 11:54 AM
To: Michael Joseph <[redacted]@galbutwalters.com>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]@mail.house.gov>
Subject: RE: U.S. House of Representatives - Committee on Ethics
Mr. Joseph,
The ISC has reason to believe you may have responsive documents related to the personal subpoena despite your assertion to the contrary. The subpoena to you in your personal capacity is for documents related to community project funding requests supported by Representative Cherfilus-McCormick's congressional office, as well as any communications with Hector Roos and [redacted] related to a variety of relevant matters

(specifically, community project funding requests, the congressional office, or the campaign) and campaign contributions by you or entities you control. You did not produce any documents, and instead provided a written response asserting that you had no responsive documents. Responsive documents would include, *e.g.*, copies of a check or bank statement showing your contributions to Representative Cherfilus-McCormick's campaign and related communications about such contributions; calendar entries for meetings related to community project funding requests; text messages and emails with Representative Cherfilus-McCormick or anyone working with her about fundraisers and other campaign activities; informational materials that you reviewed or provided about community project funding requestors; *etc.*

The ISC also expects your search for responsive communications to include all email accounts, messaging apps, or other communication platforms you have access to. While you and any counsel you retain are best positioned to determine how to ensure you provide a complete and thorough response to the subpoena, we can provide some additional information to help focus your search. For example, based on our review to date, the email accounts to be searched may include [redacted]@gmail.com (which, if you scroll below, you will see is spelled correctly in our prior emails), [redacted]@citynmb.com, and [redacted]@hudcap.com; messaging accounts to be searched may include WhatsApp and iMessage. Additionally, in searching for relevant communications, the following is a non-exclusive list of names that may be relevant: Sheila Cherfilus-McCormick, Edwin Cherfilus, Nadege LeBlanc, Hector Roos, [redacted] and [redacted].

You can produce Gmail messages as PDFs or export the files; for instructions on exporting Google data, see https://support.google.com/accounts/answer/3024190?hl=en. For instructions on exporting WhatsApp messages, see https://faq.whatsapp.com/1180414079177245/?cms_platform=android (for android phone) or https://faq.whatsapp.com/1180414079177245/?cms_platform=iphone&helpref=platform_switcher (for iPhone). For iMessage, there are some third-party applications you can use, or we can accept screenshots.

Additionally, the ISC has subpoenaed Progressive People Inc.—a company of which you are the president. You have received the subpoena that obligates Progressive People to respond. However, given your request for in-person service, the subpoena will be served on your law office and on the company's registered agent.

Any false or misleading representations you make to the Committee may implicate the False Statements statute, 18 U.S.C § 1001, or the Obstruction of Congress statute, 18 U.S.C § 1505. If the ISC believes you have intentionally failed to comply with its subpoena, it may determine to refer you to the full Committee to consider whether to hold you in contempt of Congress, which may result in criminal charges against you pursuant to 2 U.S.C. § 192.

Accordingly, please produce additional responsive documents or provide a detailed explanation of why you are unable to do so no later than **October 16**.

Please let us know if you have any questions regarding either of the outstanding subpoenas.

Thank you,

[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: Michael Joseph <[redacted]@galbutwalters.com>
Sent: Monday, September 30, 2024 4:46 PM
To: [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: U.S. House of Representatives - Committee on Ethics

Dear [redacted],

Please excuse the delayed response to your email last week. My firm's email exchange was down this weekend for software updates related to power outages from hurricane Helene.

Nonetheless, it seems from a review of your email trail that you were sending your RFI correspondences to email addresses which I no easily accessible access/spam filter stopping delivery, or transmitting correspondence with misspellings in the email address itself specifically: '[redacted]@gmail.com"(as stated on the actual RFIs) instead of to [redacted]@gmail.com or my actual firm email address: [redacted]@galbutwalters.com. I also checked my call logs to my personal cell number ([redacted]) and my direct firm/business cell [redacted]), and I was unable to locate any missed call(s) or voicemail(s) from the number you provided.

Related to the request directed to me, I have conducted a diligent search and reasonable inquiry and I am currently unable to comply with this demand because no such document(s) exist and/or ever existed.

I am not authorized to discuss any matters regarding Progressive People, Inc. without at least a subpoena reviewed by legal counsel. If still desired and to ensure confidentiality, please have service executed at my law firm's physical address detailed below. My office number for coordination with my legal staff to accept service is [redacted]

Thank you, in-advance, for your anticipated cooperation.

Best,

Michael

Michael
Michael Joseph, Esq.
Attorney At Law
Galbut Walters & Associates
4770 Biscayne Blvd.
Suite 1400
Miami, Florida 33137
Direct Telephone: [redacted]
Fax: [redacted]
[redacted]@galbutwalters.com

From: [redacted] <[redacted]@mail.house.gov>
Sent: Thursday, September 26, 2024 5:25 PM
To: Michael Joseph [redacted]@galbutwalters.com>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: U.S. House of Representatives - Committee on Ethics

Mr. Joseph,

I appreciate your responding to this latest correspondence. As you can see below, we have tried to reach you at several email addresses that we understand you have access to. Therefore, you should have received the

requests for information already. However, as a courtesy, I am reattaching them here. Nonetheless, in light of your lack of response to date, the ISC has issued the attached subpoenas to you and Progressive People Inc. Please confirm whether you will accept service of the subpoenas electronically. If you prefer, we can arrange for the U.S. Marshals Service to serve the subpoenas on you personally. Also attached are copies of the House and Committee Rules.
Let us know if you have any questions.
Thank you,
[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: Michael Joseph [redacted]@galbutwalters.com>
Sent: Thursday, September 26, 2024 2:09 PM
To: [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: FW: U.S. House of Representatives - Committee on Ethics

Dear [redacted]

I'm in receipt of your email correspondence. Also, there is no attachment(s).

Your request appears to be linked to my legal practice/representation. For future reference, please mail your request to my law firm physical address detailed below.

I will review the request once I have received it and provide a response if any.

Best,

Michael

Michael
Michael Joseph, Esq.
Attorney At Law
Galbut Walters & Associates
4770 Biscayne Blvd.
Suite 1400
Miami, Florida 33137
Direct Telephone: [redacted]
Fax: [redacted]
[redacted]@galbutwalters.com

From: Michael Joseph <[redacted].com>

Sent: Thursday, September 26, 2024 12:08 PM
To: Michael Joseph <[redacted]@galbutwalters.com>
Subject: Fwd: U.S. House of Representatives - Committee on Ethics

> [redacted].com appears similar to someone who previously sent you email, but may not be that person. Learn why this could be a risk

---------- Forwarded message ---------
From: [redacted] <[redacted]@mail.house.gov>
Date: Thu, Sep 26, 2024, 11:44 AM
Subject: RE: U.S. House of Representatives - Committee on Ethics
To: [redacted]@citynmb.com <[redacted]@citynmb.com>, [redacted]@gmail.com <[redacted]@gmail.com>, [redacted].com <[redacted].com>
Cc: [redacted] <[redacted]@mail.house.gov>, [redacted] <[redacted]@mail.house.gov>

Mr. Joseph,
The Investigative Subcommittee has determined to serve subpoenas on you for the documents sought in its requests for information. The U.S. Marshals Service will make personal service on you, unless you agree to accept service by email. Respond to this correspondence by **Monday, September 30, 2024**, if you will accept service by email.
Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted]
Sent: Thursday, August 15, 2024 9:14 AM
To: [redacted]@citynmb.com' <[redacted]@citynmb.com>; '[redacted]@gmail.com' <[redacted]@gmail.com>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: U.S. House of Representatives - Committee on Ethics
Mr. Joseph,
I am following-up on the below correspondence, as well as my voicemail from Monday, regarding the Requests for Information to you and Progressive People Inc. from the House Ethics Committee's Investigative Subcommittee (ISC) in the matter of Representative Sheila Cherfilus-McCormick. Both Requests for Information are attached here, as well as the Committee's data delivery standards and a notice of appearance should you retain counsel.
If we do not receive confirmation of receipt and your intent to cooperate with the ISC's investigation, staff may recommend that the ISC authorize subpoenas for these records.
Please let me know of any questions.
Thank you,
[redacted]

[redacted]
Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted]y
Sent: Wednesday, August 7, 2024 10:37 AM
To: [redacted]@gmail.com
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]@mail.house.gov>
Subject: RE: U.S. House of Representatives - Committee on Ethics

Mr. Joseph,

I am following-up on the below correspondence, as well as my voicemail last week, regarding the Request for Information to you from the House Ethics Committee's Investigative Subcommittee (ISC) in the matter of Representative Sheila Cherfilus-McCormick. If we do not receive confirmation of receipt and your intent to cooperate with the ISC's investigation, staff may recommend that the ISC authorize a subpoena for these records.

Please let me know of any questions.

Thank you,

[redacted]

[redacted]
Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted] <[redacted]@mail.house.gov>
Sent: Monday, July 22, 2024 11:14 AM
To: [redacted]@gmail.com
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: U.S. House of Representatives - Committee on Ethics

Good morning,

I am following up on the below correspondence. Please confirm that you received the request for information from the Investigative Subcommittee of the Committee on Ethics, which is reattached here for your convenience. Please also let us know when we can expect a response or if you do not wish to voluntarily cooperate with the ISC's request, so that the ISC may consider next steps, including whether to issue a subpoena for these records.

Thank you,

[redacted]

[redacted]
Counsel
Committee on Ethics
U.S. House of Representatives

1015 Longworth HOB
Washington, D.C. 20515
[redacted]@mail.house.gov

From: [redacted]
Sent: Tuesday, July 9, 2024 5:11 PM
To: [redacted]@gmail.com
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]@mail.house.gov>
Subject: RE: U.S. House of Representatives - Committee on Ethics

Good evening,

I am following up on the below correspondence. Please confirm that you have received the request for information from the Investigative Subcommittee of the Committee on Ethics, which is reattached here for your convenience. We are available to answer any questions you may have regarding the request for information.

Thank you,

[redacted]

Counsel
Committee on Ethics
U.S. House of Representatives
1015 Longworth HOB
Washington, D.C. 20515
[redacted]@mail.house.gov

From: [redacted]
Sent: Wednesday, June 26, 2024 4:41 PM
To: [redacted]@gmail.com' <[redacted]@gmail.com>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]@mail.house.gov>
Subject: U.S. House of Representatives - Committee on Ethics

Good afternoon,

My name is [redacted] and I am counsel with the U.S. House of Representatives Committee on Ethics. The Committee has impaneled an Investigative Subcommittee (ISC) to investigate allegations involving Representative Sheila Cherfilus-McCormick. The ISC understands you may have information relevant to this investigation, and accordingly is sending the attached request for information authorized by the Chairman and Ranking Member of the ISC. Also attached are the Committee's data delivery standards for your reference. In addition, a Notice of Appearance form is attached and, if you retain counsel, counsel should complete and return that form.

Kindly confirm receipt of this correspondence, and please let us know if you have any questions.

Thank you,
[redacted]
Counsel
Committee on Ethics
U.S. House of Representatives
1015 Longworth HOB
Washington, D.C. 20515
[redacted]@mail.house.gov

EXHIBIT 9

Subpoena Duces Tecum

By Authority of the House of Representatives of The Congress of the United States of America

To: Mr. Michael Joseph

You are hereby commanded to produce before the Investigative Subcommittee of the Committee on Ethics of the House of Representatives of the United States, of which the Honorable Andrew R. Garbarino is chairman, in room 1015 Longworth House Office Building, in the city of Washington, District of Columbia, no later than Oct. 21, 2024, the documents, records, and other information identified in the attachment to this subpoena concerning matters of inquiry before said Committee, pursuant to the instructions specified in the attachment.

To: The U.S. Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, this 24 day of Sept, 2024.

Michael Guest

The Honorable Michael Guest
Chairman
Committee on Ethics

Susan Wild

The Honorable Susan Wild
Ranking Member
Committee on Ethics

Attest:

Kevin F. McCumber

Kevin F. McCumber
Acting Clerk of the House

Subpoena for Michael Joseph to produce the things identified in the attachment to this subpoena before the Investigative Subcommittee of the Committee on Ethics, of which the Honorable Andrew R. Garbarino is the Chairman.

U.S. House of Representatives
118th Congress

Served by ....

Title ....

Manner of Service ....

Date ....

Signature of Server ....

Address ....

....

....

ATTACHMENT TO SUBPOENA TO MICHAEL JOSEPH

A. <u>Documents to be Produced</u>

1. All documents related to any community project funding requests discussed with and/or submitted to Representative Sheila Cherfilus-McCormick's congressional office for fiscal year 2023, including, but not limited to, documents related to projects with the below entities:
   a. Hemp4Water, Inc.;
   b. Spearhead Affordable Homes of Florida;
   c. Community Brainstorming Alliance;
   d. MorseLife Health System;
   e. Haitian Lawyers Association; and/or
   f. Catholic Charities of the Archdiocese of Miami, I[redacted]c.

2. All communications with Héctor Roos and/or [redacted] related to [redacted]ntative Cherfilus-McCormick, her congressional office, her affili[redacted]ed political committees, or any community project funding requests.

3. All documents related to any contributions by you or any e[redacted] you control to Representative Cherfilus-McCormick's affiliated political committees.

B. <u>Definitions</u>

1. The terms "Representative Sheila Cherfilus-McCormick" and "Representative Cherfilus-McCormick" refer to Sheila Cherfilus-McCormick, a/k/a Sheila Cherfilus.

2. The term "document" includes writings or recordings of any kind or character, regardless of how recorded, and whether original or copy, conveying information by visual, physical, mechanical, electronic, photographic, or other means, and whether taped, stored or coded electrostatically, electromagnetically, or by other means. "Document" also includes, but is not limited to, all text messages, social media messages and posts, Google messages, Google and other calendar entries, all hard copy and electronic memoranda, correspondence, letters, reports, analyses, summaries, circulars, opinions, worksheets, notices, confirmations, receipts, envelopes, pamphlets, brochures, presentations, e-mails, notes, minutes, diaries, telephone records, telephone message logs or slips, voicemail recordings or any other audio or video recordings, notations of any type of conversation, telephone call, meeting or other communication, calendars, schedules, date books, inter-office and intra-office communications, accounting and financial records of any kind (including checks (front and back), wire transfers, cash payments or receipts, and check requests), video recordings, audio recordings, microfiche, microfilm, electronic, mechanical and electric representations of any kind, and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however

produced or reproduced, and whether preserved in writing, on film, disk, videotape or other media. "Document" also includes any record in your possession, custody, or control, and all drafts, unfinished versions, preliminary versions, alterations, modifications, revisions, changes to and amendments of any of the foregoing, as well as any attachments or appendices thereto.

3. The term "political committees" has the meaning set forth in 52 U.S.C. § 30101(4) and includes any political committee directly established, maintained, or controlled by Representative Cherfilus-McCormick or authorized by her pursuant to 11 C.F.R. § 102.13 to receive contributions or make expenditures on her behalf.

4. The term "community project funding" means any request for a Member of Congress to direct congressionally appropriated funds to a specific state or local government or non-profit entity to carry out a specific community project, including any "earmark" as used in House Rule XXI, clause 9. Community project funding requests submitted by the congressional office of Representative Cherfilus-McCormick may be found at: https://cherfilus-mccormick.house.gov/services/community-funding-projects.

C. Instructions

1. The following rules of construction shall apply to each of the requests above:

   a. The terms "any" and "each" shall be construed as "any and each."

   b. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside its scope.

   c. The use of the singular form of any word shall include also within its meaning the plural form of the word so used, and vice versa.

   d. The use of the masculine form of a pronoun shall include also within its meaning the feminine form of the pronoun so used, and vice versa.

   e. The use of any tense of any verb shall include also within its meaning all other tenses of the verb so used.

2. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You also are required to produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. No records, documents, communications, data, or information called for by

this subpoena shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.

3. In the event that any entity, organization, or individual denoted in this subpoena has been known by, or presently is known by, any name other than that herein denoted, the subpoena shall be read also to include them under that alternative identification.

4. Each document produced shall be produced in a form that renders the document capable of being copied.

5. Each document produced shall be produced in the format or formats in which you have preserved them to date, as well as any and all computer records or other documents that evidence or reflect each document's metadata, including the dates on which each such document was prepared or modified and the identity/identities of anyone who prepared or modified such document. If email documents are stored in electronic form, each such document shall be produced as a .pst file.

6. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when this subpoena was served.

7. You cannot refuse to produce any document on the basis that any other person or entity also possesses non-identical or identical copies of the same document.

8. If any of the subpoenaed information is available in machine-readable form (such as punch cards, paper or magnetic tapes, drums, disks, or core storage), state the form in which it is available and provide sufficient detail to allow the information to be copied to a readable format. If the information requested is stored on a computer, indicate whether you have an existing program that will print the records in a readable form.

9. If you assert that compliance with the subpoena cannot be made in full, compliance shall be made to the extent possible and shall include an explanation of why full compliance is not possible. Failure to provide an explanation by the subpoena's return date constitutes a waiver of any objections to the subpoena.

10. In the event that a document is withheld, in whole or in part, based on a claim of privilege or attorney work product protection, provide the following information concerning any such document: (a) the privilege(s) or protection(s) asserted; (b) the type of document(s); (c) the general subject matter of the document(s); (d) the date(s), author(s), and recipient(s) of the document(s); and (e) the relationship between the author(s) and recipient(s) of the document(s).[1] Any claims of privilege

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[1] By requesting this log, the Committee does not waive, and expressly reserves, its right to challenge the basis for the claim of privilege or protection with respect to any and all information, materials, and documents withheld from production, as well as its right not to recognize any such privilege or protection in its proceedings. In complying with

or attorney work product protection are waived if you fail to provide an explanation of why full compliance is not possible and a log identifying with specificity the ground(s) for withholding each withheld document prior to the subpoena compliance date.

11. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject, and recipient) and explain the circumstances by which the document ceased to be in your possession, custody, or control.

12. If a date or other descriptive detail set forth in this subpoena referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, you shall produce all documents which would be responsive if the date or other descriptive detail were correct.

13. This subpoena is continuing in nature, and it applies fully to any newly-discovered documents, records, communications, and/or information in your possession, custody, or control. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the subpoena's return date shall be produced immediately upon location or discovery subsequent thereto.

14. Send all responsive documents and records to:

   [redacted]
   Director of Investigations
   Committee on Ethics
   U.S. House of Representatives
   1015 Longworth House Office Building
   Washington, DC 20515
   [redacted]@mail.house.gov

15. Upon completion of the production, you should submit a written certification, signed by you or your counsel, stating that (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

16. When representing a witness or entity before the Committee in response to a document request or request for transcribed interview, counsel for the witness or entity must promptly submit to the Committee a notice of appearance specifying the following: (a) counsel's name, firm or organization, and contact information;

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this subpoena, be apprised that the U.S. House of Representatives does not recognize: any of the purported non-disclosure privileges associated with the common law including, but not limited to, the deliberative process privilege, the attorney client privilege, and attorney work product protections; any purported privileges or protections from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosure agreements.

and (b) each client represented by the counsel in connection with the proceeding. Submission of a notice of appearance constitutes acknowledgement that counsel is authorized to accept service of process by the Committee on behalf of such client(s), and that counsel is bound by and agrees to comply with all applicable House and Committee rules and regulations.

EXHIBIT 10

Subpoena Duces Tecum

By Authority of the House of Representatives of The Congress of the United States of America

To: Mr. Michael Joseph

You are hereby commanded to produce before the Investigative Subcommittee of the Committee on Ethics of the House of Representatives of the United States, of which the Honorable Andrew R. Garbarino is chairman, in room 1015 Longworth House Office Building, in the city of Washington, District of Columbia, no later than Oct. 21, 2024, the documents, records, and other information identified in the attachment to this subpoena concerning matters of inquiry before said Committee, pursuant to the instructions specified in the attachment.

To: The U.S. Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, this 24 day of Sept, 2024.

Michael Guest

The Honorable Michael Guest
Chairman
Committee on Ethics

Susan Wild

The Honorable Susan Wild
Ranking Member
Committee on Ethics

Attest:

Kevin F. McCumber

Kevin F. McCumber
Acting Clerk of the House

Subpoena for Progressive People Inc. to produce the things identified in the attachment to this subpoena before the Investigative Subcommittee of the Committee on Ethics, of which the Honorable Andrew R. Garbarino is the Chairman.

U.S. House of Representatives
118th Congress

Served by DANLEE Cata

Title S.D.USM

Manner of Service PERSONAL

Date 10/8/2024

Signature of Server DCata

Address 400 N. Miami Ave 6th FL
Miami FL 33122

SERVED:
[redacted], Receptionist

ATTACHMENT TO SUBPOENA TO PROGRESSIVE PEOPLE INC.

A. Documents to be Produced

1. From January 1, 2018, to present, all corporate records for Progressive People Inc.

2. From January 1, 2018, to present, all documents related to Representative Sheila Cherfilus-McCormick's affiliated political committees. This includes, but is not limited to, any invoices, receipts, paystubs, checks, wire information, and/or bank records, relating to any transactions between Progressive People Inc. and Sheila Cherfilus-McCormick for Congress, Inc. This also includes, but is not limited to, any correspondence related to such transactions, as well as correspondence regarding campaign fundraising, operations, communications, or other campaign-related activity.

3. From January 1, 2018, to present, all documents related to Representative Cherfilus-McCormick's affiliated companies. This includes, but is not limited to, documents relating to any payments received from and/or made to any such companies.

4. From January 1, 2018, to present, all documents related to Truth and Justice, Inc. This includes, but is not limited to, documents relating to any payments received from and/or made to Truth and Justice, Inc.

B. Definitions

1. The terms "Representative Sheila Cherfilus-McCormick" and "Representative Cherfilus-McCormick" refer to Sheila Cherfilus-McCormick, a/k/a Sheila Cherfilus.

2. The term "document" includes writings or recordings of any kind or character, regardless of how recorded, and whether original or copy, conveying information by visual, physical, mechanical, electronic, photographic, or other means, and whether taped, stored or coded electrostatically, electromagnetically, or by other means. "Document" also includes, but is not limited to, all text messages, social media messages and posts, Google messages, Google and other calendar entries, all hard copy and electronic memoranda, correspondence, letters, reports, analyses, summaries, circulars, opinions, worksheets, notices, confirmations, receipts, envelopes, pamphlets, brochures, presentations, e-mails, notes, minutes, diaries, telephone records, telephone message logs or slips, voicemail recordings or any other audio or video recordings, notations of any type of conversation, telephone call, meeting or other communication, calendars, schedules, date books, inter-office and intra-office communications, accounting and financial records of any kind (including checks (front and back), wire transfers, cash payments or receipts, and check requests), video recordings, audio recordings, microfiche, microfilm, electronic, mechanical and electric representations of any kind, and other written,

printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, on film, disk, videotape or other media. "Document" also includes any record in your possession, custody, or control, and all drafts, unfinished versions, preliminary versions, alterations, modifications, revisions, changes to and amendments of any of the foregoing, as well as any attachments or appendices thereto.

3. The term "corporate records" has the meaning set forth in § 617.1601, Fla. Stat. (2023), including meeting minutes, accounting records, membership lists, articles of incorporation and bylaws.

4. The term "political committees" has the meaning set forth in 52 U.S.C. § 30101(4) and includes any political committee directly established, maintained, or controlled by Representative Cherfilus-McCormick or authorized by her pursuant to 11 C.F.R. § 102.13 to receive contributions or make expenditures on her behalf.

5. The term "affiliated companies" includes but is not limited to SCM Consulting Group LLC, EC Firm, LLC, Cherfilus & McCormick Foundation, Inc., Essential Community Health, Inc., Trinity Healthcare Services, LLC and/or any other entity known by you to be established, maintained, or controlled by Representative Cherfilus-McCormick or anyone acting on her behalf.

C. <u>Instructions</u>

1. The following rules of construction shall apply to each of the requests above:

    a. The terms "any" and "each" shall be construed as "any and each."

    b. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside its scope.

    c. The use of the singular form of any word shall include also within its meaning the plural form of the word so used, and vice versa.

    d. The use of the masculine form of a pronoun shall include also within its meaning the feminine form of the pronoun so used, and vice versa.

    e. The use of any tense of any verb shall include also within its meaning all other tenses of the verb so used.

2. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You also are required to produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third

party. No records, documents, communications, data, or information called for by this subpoena shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.

3. In the event that any entity, organization, or individual denoted in this subpoena has been known by, or presently is known by, any name other than that herein denoted, the subpoena shall be read also to include them under that alternative identification.

4. Each document produced shall be produced in a form that renders the document capable of being copied.

5. Each document produced shall be produced in the format or formats in which you have preserved them to date, as well as any and all computer records or other documents that evidence or reflect each document's metadata, including the dates on which each such document was prepared or modified and the identity/identities of anyone who prepared or modified such document. If email documents are stored in electronic form, each such document shall be produced as a .pst file.

6. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when this subpoena was served.

7. You cannot refuse to produce any document on the basis that any other person or entity also possesses non-identical or identical copies of the same document.

8. If any of the subpoenaed information is available in machine-readable form (such as punch cards, paper or magnetic tapes, drums, disks, or core storage), state the form in which it is available and provide sufficient detail to allow the information to be copied to a readable format. If the information requested is stored on a computer, indicate whether you have an existing program that will print the records in a readable form.

9. If you assert that compliance with the subpoena cannot be made in full, compliance shall be made to the extent possible and shall include an explanation of why full compliance is not possible. Failure to provide an explanation by the subpoena's return date constitutes a waiver of any objections to the subpoena.

10. In the event that a document is withheld, in whole or in part, based on a claim of privilege or attorney work product protection, provide the following information concerning any such document: (a) the privilege(s) or protection(s) asserted; (b) the type of document(s); (c) the general subject matter of the document(s); (d) the date(s), author(s), and recipient(s) of the document(s); and (e) the relationship between the author(s) and recipient(s) of the document(s).[1] Any claims of privilege

[1] By requesting this log, the Committee does not waive, and expressly reserves, its right to challenge the basis for the claim of privilege or protection with respect to any and all information, materials, and documents withheld from

or attorney work product protection are waived if you fail to provide an explanation of why full compliance is not possible and a log identifying with specificity the ground(s) for withholding each withheld document prior to the subpoena compliance date.

11. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject, and recipient) and explain the circumstances by which the document ceased to be in your possession, custody, or control.

12. If a date or other descriptive detail set forth in this subpoena referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, you shall produce all documents which would be responsive if the date or other descriptive detail were correct.

13. This subpoena is continuing in nature, and it applies fully to any newly-discovered documents, records, communications, and/or information in your possession, custody, or control. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the subpoena's return date shall be produced immediately upon location or discovery subsequent thereto.

14. Send all responsive documents and records to:

    [redacted]
    Director of Investigations
    Committee on Ethics
    U.S. House of Representatives
    1015 Longworth House Office Building
    Washington, DC 20515
    [redacted]@mail.house.gov

15. Upon completion of the production, you should submit a written certification, signed by you or your counsel, stating that (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

16. When representing a witness or entity before the Committee in response to a document request or request for transcribed interview, counsel for the witness or entity must promptly submit to the Committee a notice of appearance specifying

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production, as well as its right not to recognize any such privilege or protection in its proceedings. In complying with this subpoena, be apprised that the U.S. House of Representatives does not recognize: any of the purported non-disclosure privileges associated with the common law including, but not limited to, the deliberative process privilege, the attorney client privilege, and attorney work product protections; any purported privileges or protections from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosure agreements.

the following: (a) counsel's name, firm or organization, and contact information; and (b) each client represented by the counsel in connection with the proceeding. Submission of a notice of appearance constitutes acknowledgement that counsel is authorized to accept service of process by the Committee on behalf of such client(s), and that counsel is bound by and agrees to comply with all applicable House and Committee rules and regulations.

EXHIBIT 11

From: [redacted]
To: [redacted]
Cc: [redacted]; [redacted]; [redacted]
Subject: RE: Subpoena to Progressive People Inc.
Date: Tuesday, September 2, 2025 4:11:59 PM
Attachments: image001.png

Hi [redacted] –

I have not received any response from Mayor Joseph. So, I must assume that our firm no longer represents Progressive People Inc.

If I do hear back and learn otherwise, I will let you know immediately.

Thank you,
[redacted]

[redacted] | Trister, Ross, Schadler & Gold, PLLC
1666 Connecticut Ave. N.W. Suite 550
Washington, DC, 20009
tristerross.com
o: [redacted]
c: [redacted]

This communication is from an attorney and may contain privileged or other confidential information. If it has been sent to you in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

From: [redacted] <[redacted]@mail.house.gov>
Sent: Thursday, August 28, 2025 9:22 AM
To: [redacted] [redacted]@tristerross.com>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>; [redacted]@mail.house.gov>
Subject: Re: Subpoena to Progressive People Inc.

Hi [redacted]

Thank you for the update. We appreciate it and look forward to the future update.

[redacted]

[redacted]
Counsel
Committee on Ethics
U.S. House of Representatives
1015 Longworth HOB
Washington, D.C. 20515

[redacted]@mail.house.gov

On Aug 27, 2025, at 10:53 PM, [redacted]@tristerross.com> wrote:

Hi [redacted] –

I have not yet heard back from Mayor Joseph. I'd like to be able to confirm that our firm still represents Progressive People Inc. in this matter before agreeing to accept service. I will continue to endeavor to make that determination and will let you know as soon as I'm able to do so. If I'm unable to do by your Sept. 2 deadline, I'll let you know that, as well.

Thanks,
[redacted]
<image001.png>

[redacted] | Trister, Ross, Schadler & Gold, PLLC
1666 Connecticut Ave. N.W. Suite 550
Washington, DC, 20009
tristerross.com
o: [redacted]
c: [redacted]

From: [redacted] [redacted]@mail.house.gov>
Sent: Wednesday, August 27, 2025 2:47 PM
To: [redacted] [redacted]@mail.house.gov>; [redacted]@tristerross.com>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: Subpoena to Progressive People Inc.

Hi [redacted]

I hope you enjoyed your time away from the office. Were you able to speak with Mayor Joseph yet?

Thanks,

[redacted]
Counsel
Committee on Ethics
U.S. House of Representatives
1015 Longworth HOB
Washington, D.C. 20515
[redacted]@mail.house.gov

From: [redacted] <[redacted]@mail.house.gov>
Sent: Wednesday, August 20, 2025 11:09 AM
To: [redacted] <[redacted]@tristerross.com>
Cc: [redacted] <[redacted]@tristerross.com>; [redacted]
<[redacted]@mail.house.gov>; [redacted]
[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: Subpoena to Progressive People Inc.

Hi [redacted]

Appreciate your confirming – we look forward to hearing from you next week.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted] <[redacted]@tristerross.com>
Sent: Wednesday, August 20, 2025 10:57 AM
To: [redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@tristerross.com>; [redacted]
<[redacted]@mail.house.gov>; [redacted]
<[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: Re: Subpoena to Progressive People Inc.

Hi [redacted]

I'll be back in the office on Monday and will be in touch then after I can confer with Mayor Joseph.

Thanks,

[redacted]

[redacted]
Trister, Ross, Schadler & Gold, PLLC
1666 Connecticut Ave. N.W., Suite 550
Washington, D.C., 20009
tristerross.com
o: [redacted]
c: [redacted]

This communication is from an attorney and may contain privileged or other confidential information. If it has been sent to you in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

On Aug 20, 2025, at 10:21 AM, [redacted] @mail.house.gov> wrote:

[redacted]

My name is [redacted], and I'm counsel with the House of Representatives Committee on Ethics. We had previously corresponded with [redacted] regarding the entity Progressive People Inc. and reached out to her again this morning but received an out of office. Since she did not mention a return date, we wanted to bring the below to your attention. Could you confirm whether Trister Ross still represents Progressive People and, if so, whether you can accept service of a subpoena for Michael Joseph? Please feel free to reach out with any questions.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted]
Sent: Wednesday, August 20, 2025 9:25 AM
To: [redacted]@tristerross.com
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: Subpoena to Progressive People Inc.

[redacted]

We hope you have been well. As you may know, the Committee on Ethics has reauthorized an Investigative Subcommittee (ISC) to investigate allegations regarding Representative Cherfilus-

McCormick. The ISC has authorized a subpoena for testimony to Michael Joseph. As we noted last Congress, the ISC has questions for Mr. Joseph regarding Progressive People Inc. and the congresswoman's campaign, as well as community project funding for fiscal year 2023 (submitted in 2022).

Please let us know by **September 2nd** if there are any days and times in September that Mr. Joseph is available for the deposition. Otherwise, the ISC may determine to execute the subpoena with a date and time that is convenient to it.

Feel free to reach out with any questions.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
1015 Longworth HOB
Washington, DC 20515
[redacted]@mail.house.gov
202-225-7103

From: [redacted]@tristerross.com>
Sent: Wednesday, December 4, 2024 7:45 AM
To: [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: Re: Subpoena to Progressive People Inc.

Hi [redacted] -

Thanks for reaching out yesterday. I apologize for my late response.

Due to his recent election as mayor and duties related to that, Mr. Joseph says he's unavailable until after the end of the year, and he prefers that Progressive People Inc. receive a subpoena.

Thanks,

[redacted]

[redacted]
Trister, Ross, Schadler & Gold, PLLC
1666 Connecticut Ave. N.W., Suite 550
Washington, D.C., 20009
tristerross.com
o: [redacted]

c: [redacted]

On Dec 3, 2024, at 10:21 AM, [redacted] <[redacted]@mail.house.gov> wrote:

Good morning, [redacted]

Were you able to speak with Mr. Joseph yet regarding December dates for his interview? Also, please let us know if Mr. Joseph is willing to participate in a voluntary interview with Committee staff or if a subpoena is required.

Thank you,

[redacted]
Counsel
Committee on Ethics
U.S. House of Representatives
1015 Longworth HOB
Washington, D.C. 20515
[redacted]@mail.house.gov

From: [redacted] [redacted]@tristerross.com>
Sent: Monday, November 18, 2024 1:18 PM
To: [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: Subpoena to Progressive People Inc.

Thanks for your quick response. I'll get back to you on dates within the next couple of days.

Thanks,
[redacted]

<image001.png>

[redacted] | Trister, Ross, Schadler & Gold, PLLC

1666 Connecticut Ave. N.W. Suite 550
Washington, DC, 20009
tristerross.com
o: [redacted]
c: [redacted]

From: [redacted] <[redacted]@mail.house.gov>
Sent: Monday, November 18, 2024 1:15 PM
To: [redacted] [redacted]@tristerross.com>
Cc: [redacted] [redacted]@mail.house.gov>; [redacted]
<[redacted]@mail.house.gov>
Subject: RE: Subpoena to Progressive People Inc.

Thank you. Mr. Joseph has indeed been served with a subpoena for documents in his personal capacity, and he acknowledged receipt of that subpoena via email. The ISC will continue to communicate with Mr. Joseph directly regarding that documentary subpoena.

I anticipate the subpoena for his testimony will be issued in the near future; as previously noted, the testimony that the ISC seeks will include testimony in both his personal capacity as well as in his capacity as President of Progressive People, and I will send that testimonial subpoena to you when I have it. If you want to propose any dates/times in December (or flag any dates/times that don't work), we can see what we can do to accommodate everyone's schedules. Happy to discuss further if you have any questions.

Best,
[redacted]

From: [redacted] <[redacted]@tristerross.com>
Sent: Monday, November 18, 2024 1:00 PM
To: [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]
<[redacted]@mail.house.gov>
Subject: RE: Subpoena to Progressive People Inc.

Hi [redacted] –

I confirmed that if there were any emails or text messages, they were not retained and were instead disregarded in the usual course of business prior to the

Committee's request.

I have also confirmed that Mr. Joseph has not yet retained counsel to represent him in his personal capacity, and evidently hasn't been served yet in that capacity.

Thanks,
[redacted]

<image001.png>

[redacted] | Trister, Ross, Schadler & Gold, PLLC
1666 Connecticut Ave. N.W. Suite 550
Washington, DC, 20009
tristerross.com
o: [redacted]
c: [redacted]

This communication is from an attorney and may contain privileged or other confidential information. If it has been sent to you in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

From: [redacted] <[redacted]@mail.house.gov>
Sent: Wednesday, November 13, 2024 9:49 AM
To: [redacted]@tristerross.com>
Cc: [redacted]@mail.house.gov>; [redacted]
<[redacted]@mail.house.gov>
Subject: RE: Subpoena to Progressive People Inc.

[redacted] received. I want to confirm, the production consists of 27 pages and no related emails (such as any emails transmitting the letters at pp 16-22) or text messages.

The Subcommittee has also subpoenaed documents from Mr. Joseph, in his personal capacity, and is likely to seek his testimony, both in his personal capacity and his capacity as President of Progressive People. If the Subcommittee subpoenas his testimony, should we send that through you?

From: [redacted] <[redacted]@tristerross.com>
Sent: Tuesday, November 12, 2024 9:33 PM
To: [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]
[redacted]@mail.house.gov>

Subject: RE: Subpoena to Progressive People Inc.

Dear [redacted]

Attached please find: (1) the response of Progressive People Inc. to the Committee's subpoena; (2) documents responsive to the subpoena; (3) a certification as to the thoroughness of the search conducted; and (4) my notice of appearance.

I thank you again for your assistance in obtaining the extension for the subpoena return date.

Sincerely,
[redacted]
Counsel,
Progressive People Inc.

<image001.png>

[redacted] | Trister, Ross, Schadler & Gold, PLLC
1666 Connecticut Ave. N.W. Suite 550
Washington, DC, 20009
tristerross.com
o: [redacted]
c: [redacted]

From: [redacted] <[redacted]@mail.house.gov>
Sent: Tuesday, October 15, 2024 4:28 PM
To: [redacted] <[redacted]@tristerross.com>
Cc: [redacted] [redacted]@mail.house.gov>; [redacted]
<[redacted]@mail.house.gov>
Subject: RE: Subpoena to Progressive People Inc.

[redacted], thank you for your email. I am copying my colleagues [redacted] and [redacted] who are working on this matter. I've also enclosed a notice of appearance form for you to complete and return at your convenience.

At this time, I can grant the requested extension to November 12. I do want to caution that I do not think that the Investigative Subcommittee would permit any further extensions beyond that, as the Subcommittee first attempted to request information from Progressive People in June. If you have any questions about the RFI, please do not hesitate to reach out to me, [redacted] or [redacted]

Best,
[redacted]

****
[redacted]
Director of Investigations

Committee on Ethics
United States House of Representatives
1015 Longworth HOB
Washington, DC 20515
Phone: 202.225.7103
Cell: [redacted]
Fax: 202.225.7392
[redacted]@mail.house.gov

From: [redacted] [redacted]@tristerross.com>
Sent: Tuesday, October 15, 2024 4:22 PM
To: [redacted] [redacted]@mail.house.gov>
Subject: Subpoena to Progressive People Inc.

Dear [redacted]

I represent Progressive People Inc., a 501(c)(4) organization in Florida that received a subpoena from the Committee on Ethics or its Investigative Subcommittee in apparent relation to the Investigative Subcommittee's inquiry into allegations regarding Congresswoman Sheila Cherfilus-McCormick.

The subpoena return date is October 21. Because my campaign finance and election law practice is absorbed in matters related to the November 5 election and because Progressive People Inc.'s president, the organization's primary manager, is currently a candidate for election on that date, I am requesting that the subpoena return date be extended until after the election. I would appreciate a return date of November 12 if at all possible, but would be glad to discuss.

You may reach me at either number below or at this email address.

Thank you for your consideration.

[redacted]
Counsel
Progressive People Inc.

<image001.png>

[redacted] | Trister, Ross, Schadler & Gold, PLLC
1666 Connecticut Ave. N.W. Suite 550
Washington, DC, 20009
tristerross.com
o: [redacted]
c: [redacted]

EXHIBIT 12

LAW OFFICES
Trister, Ross, Schadler & Gold, PLLC
1666 CONNECTICUT AVENUE, N.W., FIFTH FLOOR
WASHINGTON, D.C. 20009
PHONE: (202) 328-1666
FAX: (202) 204-5946
www.tristerross.com

MICHAEL B. TRISTER
(1941-2018)

B. HOLLY SCHADLER
LAURENCE E. GOLD
ALLEN H. MATTISON
DAVID M. WACHTEL
JESSICA ROBINSON
KAREN A. POST
ELIZABETH A. GROSSMAN

PHILIP R. EAGER
BRIANA E. THIBEAU
Of Counsel
JOSEPH W. STEINBERG
SARAH E. NASON
JOHN O. SAWYKO
RENATA E. B. STRAUSE
SUSAN B. GERSHON
CARLY N. MEE
HOLLY L. RATLIFF
KAREN E. TANENBAUM
LORI A.F. RIDGEWAY

November 12, 2024

By E-mail

[redacted]
Director of Investigations
Committee on Ethics
U.S. House of Representatives
1015 Longworth House Office Building
Washington, DC 20515
[redacted]@mail.house.gov

Re: *Subpoena Duces Tecum* to Progressive People Inc.

Dear [redacted]:

I write on behalf of Progressive People Inc. ("PPI") in connection with the above-referenced subpoena. PPI has conducted a diligent review of its records and is today producing records responsive to the subpoena. Specifically, PPI is producing 15 records, Bates numbered PPI00001 through PPI00027. In the event that PPI discovers additional records responsive to the subpoena, PPI will produce them to the Committee without delay.

With regard to each record request ("R") set forth in the subpoena, PPI responds as follows:

R.1. From January 1, 2018, to present, all corporate records for Progressive People Inc.

> **PPI Response**: PPI is producing responsive records. See documents PPI00001 through PPI00014.

R2. From January 1, 2018 to present, all documents related to Representative Sheila Cherfilus-McCormick's affiliated political committees. This includes, but is not limited to, any invoices, receipts, paystubs, checks, wire information, and/or bank records, relating to any transactions between Progressive People Inc. and Sheila Cherfilus-McCormick for Congress, Inc. This also includes, but is not limited to, any correspondence related to such transactions, as well as correspondence regarding campaign fundraising, operations, communications, or other campaign-related activity.

> **PPI Response**: PPI has been unable to locate any records responsive to this request. If responsive, non-privileged records are later discovered, PPI will produce such records.

R3. From January 1, 2018, to present, all documents related to Representative Cherfilus-Mcormick's affiliated companies. This includes, but is not limited to, documents relating to any payments received from and/or made to any such companies.

> **PPI Response**: PPI has been unable to locate any records responsive to this request. If responsive, non-privileged records are later discovered, PPI will produce such records.

R4. From January 1, 2018, to the present, all documents related to Truth and Justice, Inc. This includes, but is not limited to, documents relating to any payments received from and/or made to Truth and Justice, Inc.

> **PPI Response**: PPI is producing responsive records. See documents PPI00015 through PPI00027.

* * *

If you have question regarding PPI's response to the subpoena, please contact me by phone at [redacted] or by email at [redacted]@tristerross.com

Respectfully submitted,

[redacted]

[redacted]
Counsel,
Progressive People Inc.

cc: Hon. Michael Joseph, Esquire

EXHIBIT 13

CERTIFICATION

I, Michael Joseph, President of Progressive People Inc. (the "Corporation"), hereby certify that, in response to the September 24, 2024 *subpoena duces tecum* issued to the Corporation by the Committee on Ethics of the U.S. House of Representatives, a diligent search of all documents in the possession, custody, or control of the Corporation which reasonably could contain responsive documents has been completed, and all documents located during the search that are responsive have been produced to the Committee.

[redacted]
Michael Joseph (Nov 12, 2024 19:29 EST)

Michael Joseph, President
Progressive People Inc.

11/12/24
Date

PPI.Search Certification

Final Audit Report 2024-11-13

Created:	2024-11-13
By:	[redacted]@tristerross.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAG3F58sEy5tNbmnVMEWphezhRdnKl1zAK

"PPI.Search Certification" History

Document created by [redacted]@tristerross.com)
2024-11-13 - 0:28:06 AM GMT

Document emailed to Michael Joseph ([redacted]@gmail.com) for signature
2024-11-13 - 0:28:09 AM GMT

Email viewed by Michael Joseph ([redacted]@gmail.com)
2024-11-13 - 0:29:18 AM GMT

Document e-signed by Michael Joseph [redacted]@gmail.com)
Signature Date: 2024-11-13 - 0:29:52 AM GMT - Time Source: server

Agreement completed.
2024-11-13 - 0:29:52 AM GMT

Adobe Acrobat Sign

EXHIBIT 14

Subpoena Duces Tecum

By Authority of the House of Representatives of The Congress of the United States of America

To: Mr. Michael Joseph

You are hereby commanded to produce before the Investigative Subcommittee of the Committee on Ethics of the House of Representatives of the United States, of which the Honorable Andrew R. Garbarino is chairman, in room 1015 Longworth House Office Building, in the city of Washington, District of Columbia, no later than September 9, 2025, the documents, records, and other information identified in the attachment to this subpoena concerning matters of inquiry before said Committee, pursuant to the instructions specified in the attachment.

To: The U.S. Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, this 11th day of August, 2025.

Michael Guest

The Honorable Michael Guest
Chairman
Committee on Ethics

The Honorable Mark DeSaulnier
Ranking Member
Committee on Ethics

Attest:
Kevin F. McCumber

Kevin F. McCumber
Clerk of the House

Subpoena for Michael Joseph to produce the things identified in the attachment to this subpoena before the Investigative Subcommittee of the Committee on Ethics, of which the Honorable Andrew R. Garbarino is the Chairman.

U.S. House of Representatives
119th Congress

Served by ....

Title ....

Manner of Service ....

Date ....

Signature of Server ....

Address ....

....

....

ATTACHMENT TO SUBPOENA TO MICHAEL JOSEPH

A. Documents to be Produced

1. All documents related to any community project funding requests discussed with and/or submitted to Representative Sheila Cherfilus-McCormick's congressional office for fiscal year 2023, including, but not limited to, documents related to projects with the below entities:
   a. Hemp4Water, Inc.;
   b. Spearhead Affordable Homes of Florida;
   c. Community Brainstorming Alliance;
   d. MorseLife Health System;
   e. Haitian Lawyers Association; and/or
   f. Catholic Charities of the Archdiocese of Miami, Inc.

2. All communications with Hector Roos and/or [redacted] related to Representative Cherfilus-McCormick, her congressional office, her affiliated political committees (including, but not limited to, Sheila Cherfilus-McCormick for Congress, Inc.), or any community project funding requests.

3. All documents related to any contributions by you or any entity you control to Representative Cherfilus-McCormick's affiliated political committees.

B. Definitions

1. The terms "Representative Sheila Cherfilus-McCormick" and "Representative Cherfilus-McCormick" refer to Sheila Cherfilus-McCormick, a/k/a Sheila Cherfilus.

2. The term "document" includes writings or recordings of any kind or character, regardless of how recorded, and whether original or copy, conveying information by visual, physical, mechanical, electronic, photographic, or other means, and whether taped, stored or coded electrostatically, electromagnetically, or by other means. "Document" also includes, but is not limited to, all text messages, social media messages and posts, Google messages, Google and other calendar entries, all hard copy and electronic memoranda, correspondence, letters, reports, analyses, summaries, circulars, opinions, worksheets, notices, confirmations, receipts, envelopes, pamphlets, brochures, presentations, e-mails, notes, minutes, diaries, telephone records, telephone message logs or slips, voicemail recordings or any other audio or video recordings, notations of any type of conversation, telephone call, meeting or other communication, calendars, schedules, date books, inter-office and intra-office communications, accounting and financial records of any kind (including checks (front and back), wire transfers, cash payments or receipts, and check requests), video recordings, audio recordings, microfiche, microfilm, electronic, mechanical and electric representations of any kind, and other written,

printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, on film, disk, videotape or other media. "Document" also includes any record in your possession, custody, or control, and all drafts, unfinished versions, preliminary versions, alterations, modifications, revisions, changes to and amendments of any of the foregoing, as well as any attachments or appendices thereto.

3. The term "political committee(s)" has the meaning set forth in 52 U.S.C. § 30101(4) and includes any political committee directly established, maintained, or controlled by Representative Cherfilus-McCormick or authorized by her pursuant to 11 C.F.R. § 102.13 to receive contributions or make expenditures on her behalf.

4. The term "community project funding" means any request for a Member of Congress to direct congressionally appropriated funds to a specific state or local government or non-profit entity to carry out a specific community project, including any "earmark" as used in House Rule XXI, clause 9. Community project funding requests submitted by the congressional office of Representative Cherfilus-McCormick may be found at: https://cherfilus-mccormick.house.gov/services/community-funding-projects.

C. **Instructions**

1. The following rules of construction shall apply to each of the requests above:

   a. The terms "any" and "each" shall be construed as "any and each."

   b. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside its scope.

   c. The use of the singular form of any word shall include also within its meaning the plural form of the word so used, and vice versa.

   d. The use of the masculine form of a pronoun shall include also within its meaning the feminine form of the pronoun so used, and vice versa.

   e. The use of any tense of any verb shall include also within its meaning all other tenses of the verb so used.

2. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You also are required to produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. No records, documents, communications, data, or information called for by

this subpoena shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.

3. In the event that any entity, organization, or individual denoted in this subpoena has been known by, or presently is known by, any name other than that herein denoted, the subpoena shall be read also to include them under that alternative identification.

4. Each document produced shall be produced in a form that renders the document capable of being copied.

5. Each document produced shall be produced in the format or formats in which you have preserved them to date, as well as any and all computer records or other documents that evidence or reflect each document's metadata, including the dates on which each such document was prepared or modified and the identity/identities of anyone who prepared or modified such document. If email documents are stored in electronic form, each such document shall be produced as a .pst file.

6. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when this subpoena was served.

7. You cannot refuse to produce any document on the basis that any other person or entity also possesses non-identical or identical copies of the same document.

8. If any of the subpoenaed information is available in machine-readable form (such as punch cards, paper or magnetic tapes, drums, disks, or core storage), state the form in which it is available and provide sufficient detail to allow the information to be copied to a readable format. If the information requested is stored on a computer, indicate whether you have an existing program that will print the records in a readable form.

9. If you assert that compliance with the subpoena cannot be made in full, compliance shall be made to the extent possible and shall include an explanation of why full compliance is not possible. Failure to provide an explanation by the subpoena's return date constitutes a waiver of any objections to the subpoena.

10. In the event that a document is withheld, in whole or in part, based on a claim of privilege or attorney work product protection, provide the following information concerning any such document: (a) the privilege(s) or protection(s) asserted; (b) the type of document(s); (c) the general subject matter of the document(s); (d) the date(s), author(s), and recipient(s) of the document(s); and (e) the relationship between the author(s) and recipient(s) of the document(s).[1] Any claims of privilege

[1] By requesting this log, the Committee does not waive, and expressly reserves, its right to challenge the basis for the claim of privilege or protection with respect to any and all information, materials, and documents withheld from production, as well as its right not to recognize any such privilege or protection in its proceedings. In complying with

or attorney work product protection are waived if you fail to provide an explanation of why full compliance is not possible and a log identifying with specificity the ground(s) for withholding each withheld document prior to the subpoena compliance date.

11. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject, and recipient) and explain the circumstances by which the document ceased to be in your possession, custody, or control.

12. If a date or other descriptive detail set forth in this subpoena referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, you shall produce all documents which would be responsive if the date or other descriptive detail were correct.

13. This subpoena is continuing in nature, and it applies fully to any newly-discovered documents, records, communications, and/or information in your possession, custody, or control. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the subpoena's return date shall be produced immediately upon location or discovery subsequent thereto.

14. Send all responsive documents and records to:

    [redacted]
    Director of Investigations
    Committee on Ethics
    U.S. House of Representatives
    1015 Longworth House Office Building
    Washington, DC 20515
    [redacted]@mail.house.gov

15. Upon completion of the production, you should submit a written certification, signed by you or your counsel, stating that (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

16. When representing a witness or entity before the Committee in response to a document request or request for transcribed interview, counsel for the witness or entity must promptly submit to the Committee a notice of appearance specifying the following: (a) counsel's name, firm or organization, and contact information;

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this subpoena, be apprised that the U.S. House of Representatives does not recognize: any of the purported non-disclosure privileges associated with the common law including, but not limited to, the deliberative process privilege, the attorney client privilege, and attorney work product protections; any purported privileges or protections from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosure agreements.

and (b) each client represented by the counsel in connection with the proceeding. Submission of a notice of appearance constitutes acknowledgement that counsel is authorized to accept service of process by the Committee on behalf of such client(s), and that counsel is bound by and agrees to comply with all applicable House and Committee rules and regulations.

EXHIBIT 15

Subpoena Ad Testificandum

By Authority of the House of Representatives of The Congress of the United States of America

To: Mr. Michael Joseph

You are hereby commanded to appear before the Investigative Subcommittee of the Committee on Ethics of the House of Representatives of the United States, of which the Honorable Andrew R. Garbarino is Chairman, in 1015 Longworth House Office Building at 10:00 am on October 7, 2025, to answer questions concerning matters of inquiry before said Committee.

To: The U.S. Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives
of the United States, at the city of Washington, this
9th day of September, 2025.

Michael Guest

The Honorable Michael Guest
Chairman
Committee on Ethics

The Honorable Mark DeSaulnier
Ranking Member
Committee on Ethics

Attest:
Kevin F. McCumber

Kevin McCumber
Clerk of the House

Subpoena for Michael Joseph,

Galbut Walters & Associates
4770 Biscayne Blvd.
Suite 1400
Miami, FL 33137

to appear before the Investigative Subcommittee of the Committee on Ethics, of which the Honorable Andrew R. Garbarino is the Chairman.

U.S. House of Representatives
119th Congress

Served by ....

Title ....

Manner of Service ....

Date ....

Signature of Server ....

Address ....

....

....

EXHIBIT 16

From: [redacted]
To: [redacted] Michael Joseph; [redacted]@gmail.com; [redacted].com; [redacted]@citynmb.com
Cc: [redacted]; [redacted]
Subject: RE: Response to Request - Michael Joseph, Esquire
Date: Monday, October 6, 2025 10:34:22 AM
Attachments: Notice of Appearance.pdf

Good morning,

As Mr. Joseph is now back in the country and we did not receive either a proposed alternative date/time for his testimony or an objection to the testimonial subpoena, the ISC expects to see Mr. Joseph tomorrow, **October 7 at 10:00 am** in Longworth House Office Building in Washington, D.C. for his testimony. Due to the government shutdown, some of the building entrances are closed; Mr. Joseph can enter the building using the entrance on South Capitol Street, then take the elevator or stairs to the ground floor, where 1015 is located. Witnesses are permitted to retain counsel at their own expense; if counsel will be accompanying Mr. Joseph, please have them complete and return the attached Notice of Appearance prior to the deposition.

Additionally, as the ISC did not receive any written objections to the subpoena duces tecum by the deadline, the ISC expects to receive responsive documents on or before **Tuesday, October 14**.

Please be advised that if the ISC believes Mr. Joseph has intentionally failed to comply with either the testimonial or documentary subpoena, it may determine to refer him to the full Committee to consider whether to hold him in contempt of Congress.

[redacted]
Counsel
Committee on Ethics
U.S. House of Representatives
1015 Longworth HOB
Washington, D.C. 20515
[redacted]@mail.house.gov

From: [redacted] <[redacted]@mail.house.gov>
Sent: Friday, September 12, 2025 5:16 PM
To: [redacted] <[redacted]@meyerblohmlaw.com>; Michael Joseph <[redacted]@galbutwalters.com>; [redacted]@gmail.com; [redacted].com; [redacted]@citynmb.com
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: Response to Request - Michael Joseph, Esquire

[redacted]

I appreciate you reaching out on behalf of Michael Joseph. Can you confirm when he will be returning from his travels? The investigative subcommittee (ISC) of the Committee on Ethics has subpoenaed his testimony for **October 7 at 10:00 am** in Longworth House Office Building in Washington, D.C. The ISC may reschedule Mr. Joseph's subpoenaed testimony if he provides a date and time for his appearance that is agreeable to the ISC by **Friday, October 3**.

Additionally, this is the third subpoena to Mr. Joseph for documents; the ISC previously issued subpoenas to him on September 24, 2024, and August 12, 2025, with the same requests. The August 12, 2025, subpoena had a return date of September 9. Mr. Joseph did not respond to that subpoena, and the ISC has determined to reissue the subpoena. Mr. Joseph has been aware of the ISC's questions for over a year and has yet to provide any response. Please be advised that if the ISC believes Mr. Joseph has intentionally failed to comply with either the testimonial or documentary subpoena, it may determine to refer him to the full Committee to consider whether to hold him in contempt of Congress.

Given Mr. Joseph's travel, the ISC is willing to provide him with a two-week extension to **Tuesday, October 14**. With respect to Mr. Joseph's privilege claim, the presiding member of the ISC may consider objections based on privilege, pursuant to Committee Rule 19(c). The Committee Rules are attached here for your reference. Accordingly, the ISC requests Mr. Joseph provide any objections to the subpoena in writing by **Friday, October 3**.

Finally, we understand from your response that Mr. Joseph has received the subpoenas. The Committee may consider them to be duly served. If Mr. Joseph has any objection to electronic service, however, the ISC remains willing to have hard copies of the subpoenas delivered to his office at Galbut Walters (per his acceptance of service of the September 24, 2024, subpoena).

Let us know if you have any questions.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted]@meyerblohmlaw.com>
Sent: Friday, September 12, 2025 3:45 PM
To: [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]<[redacted]@mail.house.gov>; [redacted]@mail.house.gov>
Subject: Response to Request - Michael Joseph, Esquire

Dear [redacted]

Your September 11, 2025, email to attorney Michael Joseph requesting a response by September 15, 2025, of whether he will accept an electronic subpoena and requesting document production by September 30, 2025, has been forwarded to me by his office for response. I am not entering a formal appearance as counsel, but I am sending this email solely for the purpose of advising that those dates are problematic. Mr. Joseph is out of the country and will be traveling for several weeks and, therefore, he has asked me to request that this matter be postponed until his return in early October.

Further, Mr. Joseph, an attorney, believes that an attorney/client privilege applies to the matters under investigation (the only possible exception being the documents requested in paragraph 3 of the Attachment to the Subpoena relating to contributions made to affiliated political committees, which are publicly ascertainable from the Federal Election Commission).

In any event, Mr. Joseph asked me to furnish this correspondence letting you know of his unavailability.

Sincerely yours,

[redacted] Esquire
Meyer, Blohm and Powell, P.A.
Post Office Box 1547
Tallahassee, FL 32302
www.meyerblohmlaw.com
(850) 878-5212

EXHIBIT 17

ONE HUNDRED NINETEENTH CONGRESS

U.S. House of Representatives

COMMITTEE ON ETHICS

1015 Longworth House Office Building
Washington, D.C. 20515–6328
Telephone: (202) 225–7103
https://Ethics.House.gov

November 18, 2025

CONFIDENTIAL
Michael Joseph
[redacted]@galbutwalters.com

Dear Mr. Joseph:

As you are aware, the U.S. House of Representatives Committee on Ethics (Committee) has established an Investigative Subcommittee (ISC) regarding allegations involving Representative Sheila Cherfilus-McCormick. The Committee is charged with fulfilling the House's constitutional mandate to discipline its own Members.[1]

On September 26, 2024, after several attempts to obtain your voluntary compliance with the ISC's investigation into this matter, the ISC served you with a duly issued subpoena *duces tecum* that required you to produce documents by October 21, 2024. In a September 30, 2024, email to Committee staff, you claimed that you had "conducted a diligent search and reasonable inquiry" and were "currently unable to comply with this demand because no such document(s) exist and/or ever existed." Committee staff informed you in a reply email on October 2, 2024, that the ISC had reason to believe you may have documents responsive to the subpoena *duces tecum* despite your assertion to the contrary and detailed the types of documents that would be responsive to the subpoena. Committee staff also informed you that any false or misleading representations made to the Committee may implicate the False Statements statute, 18 U.S.C § 1001, or the Obstruction of Congress statute, 18 U.S.C § 1505. However, you failed to produce any documents by October 21, 2024, and did not provide the Committee with any legal objection to the subpoena.

On August 12, 2025, the ISC served you with a duly issued subpoena *duces tecum* that required you to produce documents by September 9, 2025. However, you failed to produce any documents by that date and did not otherwise respond to the subpoena. On September 11, 2025, the ISC served you with the duly re-issued subpoena *duces tecum* that required you to produce documents by September 30, 2025, as well as with a duly issued subpoena *ad testificandum* that required you to appear for a deposition on October 7, 2025.

On September 12, 2025, Committee staff received an email from [redacted] of Meyer, Blohm and Powell, P.A., stating that the September 11, 2025, email with the subpoenas was forwarded to him by your "office" for a response. [redacted] stated that he was "not entering a

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[1] *See* U.S. Const. art. I, § 5, cl. 2; House Rule X, cl. 11(g)(4); House Rule XI, cl. 3; House Rule XXIII cl. 1 & cl. 13.

formal appearance as counsel," but was solely advising that the September deadlines for accepting electronic service of the subpoenas and for document production were "problematic." He explained that you were out of the country and traveling for several weeks, and that you had asked [redacted] to request that this matter be postponed until your return in early October. [redacted] email also stated that "Mr. Joseph, an attorney, believes that an attorney/client privilege applies to the matters under investigation (the only possible exception being the documents requested in paragraph 3 of the Attachment to the Subpoena relating to contributions made to affiliated political committees, which are publicly ascertainable from the Federal Election Commission)."

Committee staff responded to [redacted] email on September 12, 2025, the same day it was received, and copied you on the response as [redacted] did not formally appear in this matter. Staff's email stated that the ISC may reschedule your subpoenaed testimony if you provided a date and time for your appearance that is agreeable to the ISC by Friday, October 3, 2025. In light of your travel, the ISC provided you with a two-week extension to respond to the documentary subpoena, making the return date Tuesday, October 14, 2025. Committee staff also informed you and [redacted] that, with respect to your privilege claim, the presiding member of the ISC may consider objections based on privilege, pursuant to Committee Rule 19(c), and requested that you provide any objections to the subpoena in writing by Friday, October 3, 2025. Committee staff further informed you and [redacted] that staff understood from [redacted] response that you had received the subpoenas and that the Committee may consider them to be duly served, but if you had any objection to electronic service, the ISC remained willing to have hard copies of the subpoenas delivered to you.

You did not provide written legal objections to either the subpoena *ad testificandum* or the subpoena *duces tecum* by October 3, 2025, nor, as discussed further below, did you appear to give testimony. Thus, the only information the ISC has received from you regarding your asserted attorney-client privilege is the single sentence in [redacted] email. Nonetheless, the ISC has considered your privilege assertion. The single sentence provided by [redacted] did not identify a specific client whose communications with you would be protected nor address why responsive documents other than confidential communications would fall under the privilege. Additionally, the ISC is not aware of any evidence that you or your firm were either consulted for the purposes of obtaining legal services or in fact did provide legal services to entities or individuals within the scope of the ISC's subpoena. The ISC has determined that you have not made a valid assertion of the attorney-client privilege.

As detailed in an email to you from Committee staff on October 6, 2025, you were required to appear for a deposition on October 7, 2025, at 10:00 a.m., and you failed to appear. Additionally, the ISC served you with a duly issued subpoena *duces tecum* that required you to produce documents by October 14, 2025, and you failed to produce any documents. Despite multiple extensions and offers for accommodation, the ISC has yet to receive any testimony or responsive records from you. You were previously informed through Committee staff that your failure to comply with a lawfully issued subpoena may result in the ISC referring you to the full Committee to consider whether you should be held in contempt of Congress, which may result in criminal

Mr. Michael Joseph
Page 3

charges pursuant to 2 U.S.C. § 192. Accordingly, the ISC views your failure to produce documents and appear for a deposition as knowing and willful non-compliance with the subpoenas.

This letter is to inform you that the ISC is considering taking further action regarding your willful non-compliance with the subpoenas, including the invocation of contempt of Congress proceedings. If you wish to discuss alternatives, please contact the Committee within 7 days of the date of this letter. Thank you for your prompt attention to this matter.

Sincerely,

Andrew R. Garbarino
Chairman

Chrissy Houlahan
Ranking Member

EXHIBIT 18

From: [redacted]
To: [redacted]
Cc: [redacted]; [redacted]; [redacted]
Subject: RE: The Honorable Mayor Michel Joseph
Date: Monday, December 1, 2025 5:00:26 PM

Good afternoon [redacted]

In addition to the below, we wanted to let you know that the Chairman and Ranking Member have agreed to re-issue the testimonial and documentary subpoenas to Mr. Joseph. As they are doing this as a courtesy to Mr. Joseph, they expect his testimony at **10:00 a.m. in Longworth House Office Building on Friday, December 5th**. The Investigative Subcommittee will consider a request from Mr. Joseph to take his testimony remotely.

The Investigative Subcommittee also expects Mr. Joseph to provide the requested documents by Friday, December 5th.

Please let us know by **12:00pm tomorrow, December 2nd**, if Mr. Joseph would like to be served in person at his office at Galbut Walters, as arranged last Congress, or if you can accept electronic service on his behalf.

We are available to answer any questions.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted]
Sent: Wednesday, November 26, 2025 12:36 PM
To: [redacted] [redacted]@coffeyburlington.com>
Cc: [redacted]@mail.house.gov>; [redacted]
<[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: The Honorable Mayor Michel Joseph

[redacted]

We appreciate your time this morning regarding Mr. Joseph. Attached here please find the subpoenas previously issued to Mr. Joseph, including the Progressive People Inc. subpoena for your awareness, as well as related correspondence.

We will bring Mr. Joseph's request to be re-issued the subpoenas to the attention of the Chairman and Ranking Member. We'd appreciate if you could let us know the following as soon as possible so that we can update the Investigative Subcommittee:

1. Whether you will accept service of the subpoenas or whether Mr. Joseph would like to be served in-person;
2. Whether Mr. Joseph intends to assert his Fifth Amendment right;
3. Additional information explaining Mr. Joseph's failure to comply with the documentary and testimonial subpoenas; and

4. Additional information related to Mr. Joseph's attorney-client privilege assertion.

We look forward to hearing from you and can be available to discuss at your convenience.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted] <[redacted]@coffeyburlington.com>
Sent: Wednesday, November 26, 2025 12:00 PM
To: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Subject: RE: The Honorable Mayor Michel Joseph

Dear Counsel;

Thanks very much for your time today and for the helpful discussion. Without waiving any issue of service of the subpoenas, and without prejudice to your position concerning the issue, I would like to request courtesy copies of any subpoenas or document requests directed to attorney Michael Joseph.

Best regards,

[redacted]

COFFEY BURLINGTON
2601 South Bayshore Drive, PH1
Miami, FL 33133
Tel: 305.858.2900
Fax: 305.858.5261

From: [redacted] <[redacted]@mail.house.gov>
Sent: Tuesday, November 25, 2025 2:07 PM
To: [redacted] <[redacted]@coffeyburlington.com>[redacted]@mail.house.gov>
Cc: [redacted]@mail.house.gov>; [redacted]

<[redacted]@mail.house.gov>
Subject: [EXTERNAL] RE: The Honorable Mayor Michel Joseph

[redacted]

Yes, tomorrow at 11am works for us. We can use the Committee's dial in:
[redacted]
Participant code: [redacted]

If it would be helpful, we can also share our prior correspondence with Mr. Joseph in advance of the call.

We look forward to speaking with you tomorrow.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted] <[redacted]@coffeyburlington.com>
Sent: Tuesday, November 25, 2025 2:00 PM
To: [redacted] [redacted]@mail.house.gov>; [redacted]
[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]
[redacted]@mail.house.gov>
Subject: RE: The Honorable Mayor Michel Joseph

[redacted],

Thanks for your very prompt reply. Does 11am tomorrow work?

Best regards,

[redacted]

COFFEY BURLINGTON
2601 South Bayshore Drive, PH1
Miami, FL 33133
Tel: 305.858.2900
Fax: 305.858.5261

From: [redacted] [redacted]@mail.house.gov>
Sent: Tuesday, November 25, 2025 1:58 PM
To: [redacted] <[redacted]@coffeyburlington.com>; [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]@mail.house.gov>
Subject: [EXTERNAL] RE: The Honorable Mayor Michel Joseph

[redacted]

We appreciate you reaching out on behalf of Mr. Joseph. We are generally available for a call tomorrow; please let us know what time works best for you.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted] <[redacted]@coffeyburlington.com>
Sent: Tuesday, November 25, 2025 1:46 PM
To [redacted] [redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@mail.house.gov>; [redacted]
<[redacted]@mail.house.gov>; [redacted] [redacted]@mail.house.gov>
Subject: RE: The Honorable Mayor Michel Joseph

Dear [redacted];

We have been asked to represent Mayor Michael Joseph and are reviewing whether representation of a second witness in this matter would present a conflict. We have been furnished a copy of the Committee's November 18,2025 letter as well as an email thread indicating that you are an appropriate contact for this matter. We believe we will not have a conflict and would like to have a brief phone conversation with you and colleagues to discuss the path going forward. I do not envisions needing much time for this preliminary call and can find a time that works tomorrow or next week.

Cordially,

[redacted]

COFFEY BURLINGTON
2601 South Bayshore Drive, PH1
Miami, FL 33133

Tel: 305.858.2900
Fax: 305.858.5261

EXHIBIT 19

Subpoena Duces Tecum

By Authority of the House of Representatives of The Congress of the United States of America

To: Mr. Michael Joseph

You are hereby commanded to produce before the Investigative Subcommittee of the Committee on Ethics of the House of Representatives of the United States, of which the Honorable Andrew R. Garbarino is chairman, in room 1015 Longworth House Office Building, in the city of Washington, District of Columbia, no later than December 5, 2025, the documents, records, and other information identified in the attachment to this subpoena concerning matters of inquiry before said Committee, pursuant to the instructions specified in the attachment.

To: The U.S. Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, this [illegible] day of December, 2025.

Michael Guest

The Honorable Michael Guest
Chairman
Committee on Ethics

Mark DeSaulnier

The Honorable Mark DeSaulnier
Ranking Member
Committee on Ethics

Attest:

Kevin F. McCumber

Kevin F. McCumber
Clerk of the House

Subpoena for Michael Joseph to produce the things identified in the attachment to this subpoena before the Investigative Subcommittee of the Committee on Ethics, of which the Honorable Andrew R. Garbarino is the Chairman.

U.S. House of Representatives
119th Congress

Served by ....

Title ....

Manner of Service ....

Date ....

Signature of Server ....

Address ....

....

....

ATTACHMENT TO SUBPOENA TO MICHAEL JOSEPH

A. Documents to be Produced

1. All documents related to any community project funding requests discussed with and/or submitted to Representative Sheila Cherfilus-McCormick's congressional office for fiscal year 2023, including, but not limited to, documents related to projects with the below entities:
   a. Hemp4Water, Inc.;
   b. Spearhead Affordable Homes of Florida;
   c. Community Brainstorming Alliance;
   d. MorseLife Health System;
   e. Haitian Lawyers Association; and/or
   f. Catholic Charities of the Archdiocese of Miami, Inc.

2. All communications with Hector Roos and/or [redacted] related to Representative Cherfilus-McCormick, her congressional office, her affiliated political committees (including, but not limited to, Sheila Cherfilus-McCormick for Congress, Inc.), or any community project funding requests.

3. All documents related to any contributions by you or any entity you control to Representative Cherfilus-McCormick's affiliated political committees.

B. Definitions

1. The terms "Representative Sheila Cherfilus-McCormick" and "Representative Cherfilus-McCormick" refer to Sheila Cherfilus-McCormick. a/k/a Sheila Cherfilus.

2. The term "document" includes writings or recordings of any kind or character, regardless of how recorded, and whether original or copy, conveying information by visual, physical, mechanical, electronic, photographic, or other means, and whether taped, stored or coded electrostatically, electromagnetically, or by other means. "Document" also includes, but is not limited to, all text messages, social media messages and posts, Google messages, Google and other calendar entries, all hard copy and electronic memoranda, correspondence, letters, reports, analyses, summaries, circulars, opinions, worksheets, notices, confirmations, receipts, envelopes, pamphlets, brochures, presentations, e-mails, notes, minutes, diaries, telephone records, telephone message logs or slips, voicemail recordings or any other audio or video recordings, notations of any type of conversation, telephone call, meeting or other communication, calendars, schedules, date books, inter-office and intra-office communications, accounting and financial records of any kind (including checks (front and back), wire transfers, cash payments or receipts, and check requests), video recordings, audio recordings, microfiche, microfilm, electronic, mechanical and electric representations of any kind, and other written,

printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, on film, disk, videotape or other media. "Document" also includes any record in your possession, custody, or control, and all drafts, unfinished versions, preliminary versions, alterations, modifications, revisions, changes to and amendments of any of the foregoing, as well as any attachments or appendices thereto.

3. The term "political committee(s)" has the meaning set forth in 52 U.S.C. § 30101(4) and includes any political committee directly established, maintained, or controlled by Representative Cherfilus-McCormick or authorized by her pursuant to 11 C.F.R. § 102.13 to receive contributions or make expenditures on her behalf.

4. The term "community project funding" means any request for a Member of Congress to direct congressionally appropriated funds to a specific state or local government or non-profit entity to carry out a specific community project, including any "earmark" as used in House Rule XXI, clause 9. Community project funding requests submitted by the congressional office of Representative Cherfilus-McCormick may be found at: https://cherfilus-mccormick.house.gov/services/community-funding-projects.

C. Instructions

1. The following rules of construction shall apply to each of the requests above:

   a. The terms "any" and "each" shall be construed as "any and each."

   b. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside its scope.

   c. The use of the singular form of any word shall include also within its meaning the plural form of the word so used, and vice versa.

   d. The use of the masculine form of a pronoun shall include also within its meaning the feminine form of the pronoun so used, and vice versa.

   e. The use of any tense of any verb shall include also within its meaning all other tenses of the verb so used.

2. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You also are required to produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. No records, documents, communications, data, or information called for by

this subpoena shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.

3. In the event that any entity, organization, or individual denoted in this subpoena has been known by, or presently is known by, any name other than that herein denoted, the subpoena shall be read also to include them under that alternative identification.

4. Each document produced shall be produced in a form that renders the document capable of being copied.

5. Each document produced shall be produced in the format or formats in which you have preserved them to date, as well as any and all computer records or other documents that evidence or reflect each document's metadata, including the dates on which each such document was prepared or modified and the identity/identities of anyone who prepared or modified such document. If email documents are stored in electronic form, each such document shall be produced as a .pst file.

6. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when this subpoena was served.

7. You cannot refuse to produce any document on the basis that any other person or entity also possesses non-identical or identical copies of the same document.

8. If any of the subpoenaed information is available in machine-readable form (such as punch cards, paper or magnetic tapes, drums, disks, or core storage), state the form in which it is available and provide sufficient detail to allow the information to be copied to a readable format. If the information requested is stored on a computer, indicate whether you have an existing program that will print the records in a readable form.

9. If you assert that compliance with the subpoena cannot be made in full, compliance shall be made to the extent possible and shall include an explanation of why full compliance is not possible. Failure to provide an explanation by the subpoena's return date constitutes a waiver of any objections to the subpoena.

10. In the event that a document is withheld, in whole or in part, based on a claim of privilege or attorney work product protection, provide the following information concerning any such document: (a) the privilege(s) or protection(s) asserted; (b) the type of document(s); (c) the general subject matter of the document(s); (d) the date(s), author(s), and recipient(s) of the document(s); and (e) the relationship between the author(s) and recipient(s) of the document(s).[1] Any claims of privilege

[1] By requesting this log, the Committee does not waive, and expressly reserves, its right to challenge the basis for the claim of privilege or protection with respect to any and all information, materials, and documents withheld from production, as well as its right not to recognize any such privilege or protection in its proceedings. In complying with

or attorney work product protection are waived if you fail to provide an explanation of why full compliance is not possible and a log identifying with specificity the ground(s) for withholding each withheld document prior to the subpoena compliance date.

11. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject, and recipient) and explain the circumstances by which the document ceased to be in your possession, custody, or control.

12. If a date or other descriptive detail set forth in this subpoena referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, you shall produce all documents which would be responsive if the date or other descriptive detail were correct.

13. This subpoena is continuing in nature, and it applies fully to any newly-discovered documents, records, communications, and/or information in your possession, custody, or control. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the subpoena's return date shall be produced immediately upon location or discovery subsequent thereto.

14. Send all responsive documents and records to:

[redacted]
Director of Investigations
Committee on Ethics
U.S. House of Representatives
1015 Longworth House Office Building
Washington, DC 20515
[redacted]@mail.house.gov

15. Upon completion of the production, you should submit a written certification, signed by you or your counsel, stating that (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

16. When representing a witness or entity before the Committee in response to a document request or request for transcribed interview, counsel for the witness or entity must promptly submit to the Committee a notice of appearance specifying the following: (a) counsel's name, firm or organization, and contact information;

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this subpoena, be apprised that the U.S. House of Representatives does not recognize: any of the purported non-disclosure privileges associated with the common law including, but not limited to, the deliberative process privilege, the attorney client privilege, and attorney work product protections; any purported privileges or protections from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosure agreements.

and (b) each client represented by the counsel in connection with the proceeding. Submission of a notice of appearance constitutes acknowledgement that counsel is authorized to accept service of process by the Committee on behalf of such client(s), and that counsel is bound by and agrees to comply with all applicable House and Committee rules and regulations.

EXHIBIT 20

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: re Testimony of Michael Joseph US House of Representatives - Committee on Ethics
Date: Thursday, December 4, 2025 6:12:34 PM

Counsel,

As stated yesterday, the ISC considers Mr. Joseph to have been served these subpoenas months ago and reissued them as a courtesy. We informed you on Monday, December 1st, that the ISC would expect your client, Mr. Joseph, to provide testimony and documents by tomorrow, December 5th, given the months of delays. You were sent copies of the subpoenas yesterday, in your capacity as his counsel. The Marshals' attempt to serve Mr. Joseph in person were also done as a courtesy at his request, although neither House nor Committee Rules require the type of service Mr. Joseph has insisted upon. It is apparent that his insistence on "personal service" of subpoenas he has already been served with—including a subpoena *duces tecum* he has been aware of for over a year and a subpoena *ad testificandum* he has been aware of for months—is a pretext to avoid complying with Congressional subpoenas.

Furthermore, in our discussions this week, we repeatedly noted that the Marshals would attempt to personally serve Mr. Joseph by today, Thursday, December 4th. In their attempt to do so, the Marshals learned that Mr. Joseph was in New Orleans. Only this afternoon did you inform ISC staff that Mr. Joseph would be traveling today. The Marshals wasted time and resources due to your lack of communication, which the ISC may deem to be another intentional delay tactic.

As previously offered, the ISC is willing to accommodate an alternate date for Mr. Joseph's subpoenaed testimony. Yet, Mr. Joseph has also been unwilling to engage in good faith discussions regarding this subject unless the subpoenas are personally served. **Therefore, unless you are able to provide dates and times that Mr. Joseph will be available for a deposition the week of December 8th by 10:00 a.m. tomorrow, December 5th, the ISC will be moving forward with the deposition as scheduled.** The ISC will agree to hold the deposition remotely per your request, including if Mr. Joseph makes himself available to provide testimony tomorrow.

The ISC will consider Mr. Joseph's multiple attempts to evade compliance with its subpoenas and his conduct in engaging with the ISC in deciding its next steps, including its consideration of whether to recommend the Committee begin contempt of Congress proceedings against him.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
[redacted]@mail.house.gov
202-225-7103

From: [redacted] [redacted]@coffeyburlington.com>
Sent: Thursday, December 4, 2025 4:43 PM
To: [redacted] <[redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>; [redacted] [redacted]@mail.house.gov>; [redacted] <[redacted]@mail.house.gov>
Cc: [redacted] <[redacted]@coffeyburlington.com>; [redacted] <[redacted]@coffeyburlington.com>
Subject: re TEstimony of MIchael Joseph US House of Representatives - Committee on Ethics

Counsel:

Good afternoon. I spoke with [redacted] and reviewed the below email and its attached subpoena this afternoon. As I understand the situation, Mr Joseph, by counsel requested formal service of a subpoena as a prerequisite to his testimony and indicated he would be available for service in his office on December 5. The Marshal unfortunately attempted service today (December 4) while the Mayor was absent and out of town. I am sorry for that inconvenience.

[redacted] advised that the Committee expects Mr. Joseph to appear in Washington for live testimony tomorrow on less than 24 hours notice. I respectfully must object to this on various grounds, including personal conflicts, as well as the lack of service of process of the subpoena. Please do not incur any expenses in preparation for questioning which will not occur tomorrow.

As I told you my commitment on behalf of my client is to promptly make him available when served for questioning. However, less than 24 hours is neither customary nor sufficient notice. I would also request that the questioning be by zoom or other remote method as is typical, which is more convenient for all parties, and would allow for more options for more expedited scheduling. In the event that you insist on live testimony, what witness fee and travel accommodations are provided?

On the assumption that as [redacted] and I discussed Mr Joseph will be served tomorrow, I will be in contact with you and our client shortly thereafter with an eye toward moving forward with the questioning which the Committee is anxious to obtain.

Respectfully,

[redacted]

[redacted]@coffeyburlington.com

Cell [redacted]

COFFEY | BURLINGTON

2601 South Bayshore Drive, Penthouse

Miami, Florida 33133

T. 305-858-2900

F.305-858-5261

www.coffeyburlington.com

From: "[redacted]" <[redacted]@mail.house.gov>
Date: December 3, 2025 at 11:34:58 AM EST
To: [redacted] <[redacted]@coffeyburlington.com>, [redacted]@coffeyburlington.com>
Cc: [redacted]" <[redacted]@mail.house.gov>, [redacted] <[redacted]@mail.house.gov>, "[redacted]" <[redacted]@mail.house.gov>
Subject: [EXTERNAL] US House of Representatives - Committee on Ethics

Dear Counsel,

Regarding service of process, the subpoenas have already been served on Mr. Joseph. The subpoena *duces tecum* and the subpoena *ad testificandum* were originally served on September 11, 2025, and the subpoena *duces tecum* was also served on August 12, 2025, and September 26, 2024 (the latter of which was also served on Mr. Joseph in person on October 8, 2024). Furthermore, as you know, the Investigative Subcommittee (ISC) has been attempting to obtain information from Mr. Joseph for well over a year, including via subpoena. Despite receiving a total of four subpoenas from the ISC, Mr. Joseph appears to still be avoiding compliance with the subpoenas by claiming that "personal service" is necessary. Even though Mr. Joseph has already been duly served with these subpoenas, to extinguish any doubt on this issue, the ISC will work with the Marshals to have Mr. Joseph personally served with the two attached subpoenas at his law firm Thursday, December 4th. These subpoenas, which seek the same information sought in the subpoenas noted above, have been reissued as a courtesy to Mr. Joseph at his request. If Mr. Joseph will not be at his law firm address on the 4th, please provide us with an address where he can be served as soon as possible. If he is not at his law office when service is attempted and we do not receive an alternative service address, we will ask the Marshals to effect personal service on Mr. Joseph wherever he may be.

As we informed you on Monday, December 1st, both subpoenas will be returnable this Friday, December 5th. We understand from our conversation yesterday that Mr. Joseph objects to the short notice but refuses to provide alternative dates for his testimony until after he is personally served with the subpoena. This is one of many apparent attempts by Mr. Joseph to evade service and avoid compliance with ISC subpoenas. Mr. Joseph has repeatedly ignored outreach from ISC staff (dating back to October 2024) and, once he finally responded after almost a year of silence, has only engaged in dilatory and bad-faith efforts to impede the ISC's investigation. As you have been told, the ISC is already considering whether to refer Mr. Joseph for contempt of Congress based on his conduct to date, and it will take into account whether he continues to ignore the ISC or complies with these subpoenas in making a final determination.

The Committee has issued the testimonial subpoena for **December 5, 2025, at 10am in 1015 Longworth House Office Building in Washington DC**. I understand that you are considering objecting on the grounds of insufficient notice, but Mr. Joseph has had ample notice. As an overarching point, any such objection does not excuse Mr. Joseph from his legal obligation to appear for the deposition. As to notice, in addition to our recent communications with you, Mr. Joseph has been aware of the information sought by these subpoenas for months, and in fact received copies of identical subpoenas three months ago, on September 11, 2025. Further, he also received the same documentary subpoena a month prior to that, on August 12, 2025, and over a year ago, on September 26, 2024. Mr. Joseph is free to make whatever good faith arguments he may wish to make, but no such argument would excuse him from the legal obligation to appear in person for testimony on Friday December 5th. If he has objections to any specific questions, he is free to raise them during the deposition.

We expect that the testimonial subpoena will alleviate Mr. Joseph's purported "confidentiality" concerns regarding Rule 4-1.6 of the Florida Bar Rules of Professional Conduct given that the comment to that Rule states in part, "[t]he rule of client-lawyer confidentiality applies in situations other than those where evidence is sought from the lawyer through compulsion of law." Since Mr. Joseph will be testifying pursuant to a subpoena, and therefore through compulsion of law, this rule does not prevent him from answering the ISC's questions during the deposition.

To the extent that Mr. Joseph intends to assert attorney-client privilege, the ISC has already determined that his assertion is not valid, as outlined in the letter he received on November 18, 2025. Since that letter, no new information has been presented to the ISC; no specific client has been identified whose communications with Mr. Joseph would be protected, nor has Mr. Joseph addressed why responsive documents would fall under the privilege. Additionally, the ISC is still unaware of any evidence that Mr. Joseph or his firm were either consulted for the purposes of obtaining legal services or in fact did provide legal services to entities or individuals within the scope of the ISC's subpoena. Thus, without more information that establishes a foundation for him to assert the privilege, the ISC's determination stands. Again, if Mr. Joseph intends to raise this or any other objection to the ISC's questions, he is free to do so during the deposition.

Finally, if Mr. Joseph intends to assert his 5th Amendment right as to any or all testimony or documents, please let us know as soon as possible.

Thank you,
[redacted]

[redacted]
Senior Counsel
Committee on Ethics
United States House of Representatives
1015 Longworth HOB
Washington, DC 20515
[redacted]@mail.house.gov
202-225-7103

EXHIBIT 21

DEPOSITION OF MICHAEL JOSEPH
Friday, December 5, 2025
House of Representatives,
Committee on Ethics,
Investigative Subcommittee,
Washington, D.C.

The deposition convened at 10:19 a.m., in Room 1015, Longworth House Office Building.

Staff Present: [redacted], Senior Counsel; and [redacted], Counsel.

[redacted]. We are on the record.

Today is Friday, December 5th, 2025, and the time is 10:18 a.m. We're convened in Longworth House Office Building Room 1015 for the deposition of Michael Joseph to be conducted by the investigative subcommittee of the Committee on Ethics established to review allegations relating to Representative Sheila Cherfilus-McCormick.

My name is [redacted], and I am the designated committee investigative counsel for this proceeding.

Mr. Joseph has previously failed to comply with documentary and testimonial subpoenas issued by the investigative subcommittee.

A detailed account of these events can be found in the record made on October 7th, 2025, when Mr. Joseph failed to appear for his scheduled deposition.

On November 18th, 2025, Mr. Joseph was sent a letter informing him that the investigative subcommittee had determined that he had not made a valid assertion of the attorney-client privilege and was considering taking further action regarding his willful noncompliance with the subpoenas, including the invocation of contempt of Congress proceedings.

The letter informed him that if he wished to discuss alternatives, he should contact the committee by November 25th, 2025.

On November 25th, 2025, committee staff received an email from an attorney at Coffey Burlington regarding their potential representation of Michael Joseph.

In a conversation with counsel the next day, committee staff explained the investigative subcommittee's position on Michael Joseph's prior lack of responsiveness and cooperation.

Counsel stated that Mr. Joseph believed he could assert the attorney-client privilege regarding the information and documents sought by the subpoenas. Committee staff informed them that the ISC had already determined this was not a valid assertion of the privilege.

Counsel also requested that the subpoenas be reissued and Mr. Joseph be given another opportunity to cooperate. Committee staff informed him that they would bring Mr. Joseph's request to reissue the subpoenas to the attention of the committee's chairman and ranking member.

On December 1st, 2025, committee staff informed Mr. Joseph's counsel that, as a courtesy to Mr. Joseph, the chairman and ranking member agreed to reissue the testimonial and documentary subpoenas and expected his testimony at 10 a.m. in the Longworth House Office Building on Friday, December 5th.

Counsel responded that, in order to satisfy Rule 4-1.6 of the Florida Bar Rules of Professional Conduct, Mr. Joseph is, quote, "obligated to require a properly served subpoena before he can respond to inquiries without prior or existing representations," end quote.

Mr. Joseph took the position that proper service of the subpoena could only be achieved via personal service of the subpoenas on Mr. Joseph by the U.S. Marshals, although counsel acknowledged that they informed Mr. Joseph that they could accept service of the subpoenas via email. They also indicated Mr. Joseph would continue to assert the attorney-client privilege after service.

On December 2nd, 2025, committee staff spoke with Mr. Joseph's counsel, who objected to the short notice of the reissued subpoenas, but stated that Mr. Joseph refused to provide alternative dates for his testimony until after he was personally serve with a subpoena.

Also during this call, staff informed counsel that the marshals would attempt to serve their client by Thursday, December 4th.

On December 3rd, 2025, committee staff informed Mr. Joseph's counsel by email that even though Mr. Joseph had already been duly served with the subpoenas, to extinguish any doubt on this issue the investigative subcommittee would work with the marshals to have Mr. Joseph personally served with the two subpoenas at his law firm on Thursday, December 4th. Copies of the subpoenas were also attached to this email.

Committee staff also asked counsel to inform them as soon as possible if Mr. Joseph will not be at his law firm address on the 4th, and if that was the case, to provide an address where Mr. Joseph could be served.

Moreover, the email informed counsel that a notice of objection does not excuse Mr. Joseph from his legal obligation to appear for the deposition and Mr. Joseph was expected to give testimony on the 5th.

On December 4th, 2025, the marshals attempted to serve Mr. Joseph multiple times, both at his law office and at city hall.

Their first attempt to serve Mr. Joseph was at his law office prior to 10 a.m. The marshals were informed that Mr. Joseph was not at the office yet. So they attempted service at the law office again around noon.

At that time, they were informed Mr. Joseph was at his mayoral office. The marshals then attempted to serve Mr. Joseph at the mayoral office and were told that Mr. Joseph was in New Orleans.

Committee staff also attempted to reach out to Mr. Joseph's counsel around this time regarding his whereabouts, but got no response.

Committee staff called Mr. Joseph's law firm around 2 p.m. and were informed that Mr. Joseph was in New Orleans on, quote, "mayoral business."

When committee staff were finally able to speak with Mr. Joseph's counsel about 2 hours later, he confirmed that Mr. Joseph was in New Orleans and claimed that he had not seen the December 3rd email.

Staff informed counsel that the ISC considered Mr. Joseph to have been served and reiterated the ISC's expectation that Mr. Joseph would appear today.

Counsel subsequently emailed committee staff around 4:45 p.m. stating inter alia that he objected to Mr. Joseph's appearance today, quote, "on various grounds, including personal conflicts, as well as the lack of service of process of the subpoena," end quote, and that Mr. Joseph would not, in fact, be appearing today. Counsel also requested that any deposition be held remotely.

Committee staff responded around 6:15 p.m., stating, among other things, that the marshals' attempt to serve Mr. Joseph in person was done as a courtesy at his request, although neither House nor committee rules require the type of service Mr. Joseph had insisted upon, and he had previously been served with these subpoenas.

Staff also informed counsel that they and their client had notice of the return date of the subpoenas as early as Monday, December 1st, and Mr. Joseph had been aware of the subpoenas for months, in the case of the testimonial subpoena, and over a year, in the case of the documentary subpoena.

This email also stated that unless counsel was unable to provide dates and times that Mr. Joseph would be available for a deposition the week of December 8th by 10 a.m. on December 5th, the investigative subcommittee would be moving forward with the deposition as scheduled.

Moreover, the investigative subcommittee agreed to hold the deposition remotely per counsel's request, including if Mr. Joseph made himself available to provide testimony today.

Counsel never responded to this email.

The time is now 10:24 a.m. Mr. Joseph has still not appeared or communicated that he will appear. Accordingly, Mr. Joseph is not in compliance with the duly authorized subpoenas.

The record is now closed.

[Whereupon, at 10:25 a.m., the deposition was concluded.]

EXHIBIT 22

Subpoena Duces Tecum

By Authority of the House of Representatives of The Congress of the United States of America

To: Mr. Michael Joseph

You are hereby commanded to produce before the Investigative Subcommittee of the Committee on Ethics of the House of Representatives of the United States, of which the Honorable Andrew R. Garbarino is chairman, in room 1015 Longworth House Office Building, in the city of Washington, District of Columbia, no later than September 30 2025, the documents, records, and other information identified in the attachment to this subpoena concerning matters of inquiry before said Committee, pursuant to the instructions specified in the attachment.

To: The U.S. Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, this 9 day of September, 2025.

The Honorable Michael Guest
Chairman
Committee on Ethics

The Honorable Mark DeSaulnier
Ranking Member
Committee on Ethics

Attest:

Kevin F. McCumber
Clerk of the House

Subpoena for Michael Joseph to produce the things identified in the attachment to this subpoena before the Investigative Subcommittee of the Committee on Ethics, of which the Honorable Andrew R. Garbarino is the Chairman.

U.S. House of Representatives
119th Congress

Served by ....

Title ....

Manner of Service ....

Date ....

Signature of Server ....

Address ....

....

ATTACHMENT TO SUBPOENA TO MICHAEL JOSEPH

A. Documents to be Produced

1. All documents related to any community project funding requests discussed with and/or submitted to Representative Sheila Cherfilus-McCormick's congressional office for fiscal year 2023, including, but not limited to, documents related to projects with the below entities:
   a. Hemp4Water, Inc.;
   b. Spearhead Affordable Homes of Florida;
   c. Community Brainstorming Alliance;
   d. MorseLife Health System;
   e. Haitian Lawyers Association; and/or
   f. Catholic Charities of the Archdiocese of Miami, Inc.

2. All communications with Hector Roos and/or [redacted] related to Representative Cherfilus-McCormick, her congressional office, her affiliated political committees (including, but not limited to, Sheila Cherfilus-McCormick for Congress, Inc.), or any community project funding requests.

3. All documents related to any contributions by you or any entity you control to Representative Cherfilus-McCormick's affiliated political committees.

B. Definitions

1. The terms "Representative Sheila Cherfilus-McCormick" and "Representative Cherfilus-McCormick" refer to Sheila Cherfilus-McCormick, a/k/a Sheila Cherfilus.

2. The term "document" includes writings or recordings of any kind or character, regardless of how recorded, and whether original or copy, conveying information by visual, physical, mechanical, electronic, photographic, or other means, and whether taped, stored or coded electrostatically, electromagnetically, or by other means. "Document" also includes, but is not limited to, all text messages, social media messages and posts, Google messages, Google and other calendar entries, all hard copy and electronic memoranda, correspondence, letters, reports, analyses, summaries, circulars, opinions, worksheets, notices, confirmations, receipts, envelopes, pamphlets, brochures, presentations, e-mails, notes, minutes, diaries, telephone records, telephone message logs or slips, voicemail recordings or any other audio or video recordings, notations of any type of conversation, telephone call, meeting or other communication, calendars, schedules, date books, inter-office and intra-office communications, accounting and financial records of any kind (including checks (front and back), wire transfers, cash payments or receipts, and check requests), video recordings, audio recordings, microfiche, microfilm, electronic, mechanical and electric representations of any kind, and other written,

printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, on film, disk, videotape or other media. "Document" also includes any record in your possession, custody, or control, and all drafts, unfinished versions, preliminary versions, alterations, modifications, revisions, changes to and amendments of any of the foregoing, as well as any attachments or appendices thereto.

3. The term "political committee(s)" has the meaning set forth in 52 U.S.C. § 30101(4) and includes any political committee directly established, maintained, or controlled by Representative Cherfilus-McCormick or authorized by her pursuant to 11 C.F.R. § 102.13 to receive contributions or make expenditures on her behalf.

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C. Instructions

1. The following rules of construction shall apply to each of the requests above:

   a. The terms "any" and "each" shall be construed as "any and each."

   b. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside its scope.

   c. The use of the singular form of any word shall include also within its meaning the plural form of the word so used, and vice versa.

   d. The use of the masculine form of a pronoun shall include also within its meaning the feminine form of the pronoun so used, and vice versa.

   e. The use of any tense of any verb shall include also within its meaning all other tenses of the verb so used.

2. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You also are required to produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. No records, documents, communications, data, or information called for by

this subpoena shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.

3. In the event that any entity, organization, or individual denoted in this subpoena has been known by, or presently is known by, any name other than that herein denoted, the subpoena shall be read also to include them under that alternative identification.

4. Each document produced shall be produced in a form that renders the document capable of being copied.

5. Each document produced shall be produced in the format or formats in which you have preserved them to date, as well as any and all computer records or other documents that evidence or reflect each document's metadata, including the dates on which each such document was prepared or modified and the identity/identities of anyone who prepared or modified such document. If email documents are stored in electronic form, each such document shall be produced as a .pst file.

6. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when this subpoena was served.

7. You cannot refuse to produce any document on the basis that any other person or entity also possesses non-identical or identical copies of the same document.

8. If any of the subpoenaed information is available in machine-readable form (such as punch cards, paper or magnetic tapes, drums, disks, or core storage), state the form in which it is available and provide sufficient detail to allow the information to be copied to a readable format. If the information requested is stored on a computer, indicate whether you have an existing program that will print the records in a readable form.

9. If you assert that compliance with the subpoena cannot be made in full, compliance shall be made to the extent possible and shall include an explanation of why full compliance is not possible. Failure to provide an explanation by the subpoena's return date constitutes a waiver of any objections to the subpoena.

10. In the event that a document is withheld, in whole or in part, based on a claim of privilege or attorney work product protection, provide the following information concerning any such document: (a) the privilege(s) or protection(s) asserted; (b) the type of document(s); (c) the general subject matter of the document(s); (d) the date(s), author(s), and recipient(s) of the document(s); and (e) the relationship between the author(s) and recipient(s) of the document(s).[1] Any claims of privilege

[1] By requesting this log, the Committee does not waive, and expressly reserves, its right to challenge the basis for the claim of privilege or protection with respect to any and all information, materials, and documents withheld from production, as well as its right not to recognize any such privilege or protection in its proceedings. In complying with

or attorney work product protection are waived if you fail to provide an explanation of why full compliance is not possible and a log identifying with specificity the ground(s) for withholding each withheld document prior to the subpoena compliance date.

11. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject, and recipient) and explain the circumstances by which the document ceased to be in your possession, custody, or control.

12. If a date or other descriptive detail set forth in this subpoena referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, you shall produce all documents which would be responsive if the date or other descriptive detail were correct.

13. This subpoena is continuing in nature, and it applies fully to any newly-discovered documents, records, communications, and/or information in your possession, custody, or control. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the subpoena's return date shall be produced immediately upon location or discovery subsequent thereto.

14. Send all responsive documents and records to:

    [redacted]
    Director of Investigations
    Committee on Ethics
    U.S. House of Representatives
    1015 Longworth House Office Building
    Washington, DC 20515
    [redacted]@mail.house.gov

15. Upon completion of the production, you should submit a written certification, signed by you or your counsel, stating that (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

16. When representing a witness or entity before the Committee in response to a document request or request for transcribed interview, counsel for the witness or entity must promptly submit to the Committee a notice of appearance specifying the following: (a) counsel's name, firm or organization, and contact information;

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this subpoena, be apprised that the U.S. House of Representatives does not recognize: any of the purported non-disclosure privileges associated with the common law including, but not limited to, the deliberative process privilege, the attorney client privilege, and attorney work product protections; any purported privileges or protections from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosure agreements.

and (b) each client represented by the counsel in connection with the proceeding. Submission of a notice of appearance constitutes acknowledgement that counsel is authorized to accept service of process by the Committee on behalf of such client(s), and that counsel is bound by and agrees to comply with all applicable House and Committee rules and regulations.

EXHIBIT 23

DEPOSITION OF MICHAEL JOSEPH

Tuesday, October 7, 2025

House of Representatives,

Committee on Ethics,

Washington, D.C.

The deposition convened at 10:07 a.m., in Room 1015, Longworth House Office Building.

Staff Present: [redacted], Counsel to the Ranking Member; [redacted], Director of Investigations; [redacted], Senior Counsel; [redacted], Counsel; [redacted], Counsel; and [redacted], Counsel.

[redacted]. We are on the record.

Today is Tuesday, October 7, 2025, and the time is 10:07 a.m. We are convened in Longworth House Office Building, Room 1015, for the deposition of Michael Joseph, to be conducted by the investigative subcommittee of the Committee on Ethics established to review allegations relating to Representative Sheila Cherfilus-McCormick.

My name is [redacted], and I am the designated committee investigative counsel for this proceeding.

Mr. Joseph was initially served a documentary subpoena in the 118th Congress by email on September 26, 2024. The subpoena pertained to community project funding requests supported by Representative Cherfilus-McCormick's congressional office, contributions to Representative Cherfilus-McCormick's affiliated political committees by Mr. Joseph or entities he owned or controlled, and communications between Mr. Joseph and certain individuals related to Representative Cherfilus-McCormick, her congressional office, her affiliated political committees, and any community project funding requests.

In a September 30, 2024, email to committee staff, Mr. Joseph claimed that he had, quote, "conducted a diligent search and reasonable inquiry," end quote, and was, quote, "currently unable to comply with this demand because no such documents exist and/or ever existed," end quote.

Committee staff informed Mr. Joseph in a reply email on October 2, 2024, that the investigative subcommittee had reason to believe he may have responsive documents related to the personal subpoena despite his assertion to the contrary and detailed the types of documents that would be responsive to the subpoena.

Committee staff also informed Mr. Joseph that any false or misleading representations he made to the committee may implicate the False Statements statute, 18 U.S.C. Section 1001, or the Obstruction of Congress statute, 18 U.S.C. Section 1505.

Mr. Joseph was again served a documentary subpoena this Congress, by email on August 12, 2025. This subpoena related to the same issues as the last subpoena and had a return date of September 9, 2025. Mr. Joseph did not produce documents or otherwise respond to the subpoena.

The documentary subpoena was reissued with a return date of September 30, 2025, and was served on Mr. Joseph by email on September 11, 2025.

On September 11, 2025, Mr. Joseph was also served a subpoena by email compelling his testimony today, October 7, 2025, at 10:00 a.m. in 1015 Longworth House Office Building. The September 11 email asked Mr. Joseph to confirm whether he would accept electronic service of the subpoena by Monday, September 15, at 12:00 p.m.

On September 12, 2025, committee staff received an email from [redacted] of Meyer, Blohm and Powell, P.A., stating that the September 11, 2025, email with the subpoenas was forwarded to him by Mr. Joseph's, quote, "office for response," end quote.

[redacted] stated that he was not entering a formal appearance as counsel but was sending the email solely for the purpose of advising that the September deadlines for accepting electronic service of the subpoenas and for document production were, quote, "problematic."

He explained that Mr. Joseph was out of the country, would be traveling for several weeks, and had asked [redacted] to request that this matter be postponed until his return in early October.

[redacted] email also stated that, quote, "Mr. Joseph, an attorney, believes that an attorney/client privilege applies to the matters under investigation (the only possible exception being the documents requested in paragraph 3 of the attachment to the subpoena relating to contributions made to affiliated political committees, which are publicly ascertainable from the Federal Election Commission)," end quote.

Committee staff responded to [redacted] email on September 12, 2025, the same day it was received, and copied Mr. Joseph on the response as [redacted] did not formally appear in this matter. Staff's email stated that the investigative subcommittee may reschedule Mr. Joseph's subpoenaed testimony if he provides a date and time for his appearance that is agreeable to the investigative subcommittee by Friday, October 3.

In light of Mr. Joseph's travel, the investigative subcommittee provided Mr. Joseph with a two-week extension to respond to the documentary subpoena, making the return date Tuesday, October 14.

Committee staff also informed [redacted] and Mr. Joseph that, with respect to Mr. Joseph's privilege claim, the presiding member of the investigative subcommittee may consider objections based on privilege, pursuant to Committee Rule 19(c), and requested that Mr. Joseph provide any objections to the subpoena in writing by Friday, October 3.

Committee staff further informed [redacted] and Mr. Joseph that staff understood from [redacted] response that Mr. Joseph has received the subpoenas and that the committee may consider them to be duly served; but if Mr. Joseph has any objection to electronic service, the investigative subcommittee remained willing to have hard copies of the subpoenas delivered to Mr. Joseph.

Mr. Joseph did not provide an alternative date for his testimony by October 3, nor did he provide written objections to either subpoena. Mr. Joseph also did not object to the electronic service of the subpoenas or request to be served hard copies.

Yesterday, October 6, 2025, committee staff reminded Mr. Joseph that the ISC expected him to appear today. Mr. Joseph did not respond. At no time did Mr. Joseph inform the subcommittee that he would be absent today or provide any valid objection to appearing.

The time is now 10:13 a.m. Mr. Joseph has still not appeared or communicated that he will appear. Accordingly, Mr. Joseph is not in compliance with the duly authorized subpoena.

The record is now closed.

[Whereupon, at 10:14 a.m., the deposition was concluded.]

EXHIBIT 24

Subpoena Ad Testificandum

By Authority of the House of Representatives of The Congress of the United States of America

To: Mr. Michael Joseph

You are hereby commanded to appear before the Investigative Subcommittee of the Committee on Ethics of the House of Representatives of the United States, of which the Honorable Andrew R. Garbarino is Chairman, in 1015 Longworth House Office Building at 10:00am on December 5, 2025, to answer questions concerning matters of inquiry before said Committee.

To: The U.S. Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, this 2nd day of December, 2025.

Michael Guest

The Honorable Michael Guest
Chairman
Committee on Ethics

Mark DeSaulnier

The Honorable Mark DeSaulnier
Ranking Member
Committee on Ethics

Attest:

Kevin McCumber

Kevin McCumber
Clerk of the House

Subpoena for Michael Joseph,

Galbut Walters & Associates
4770 Biscayne Blvd.
Suite 1400
Miami, FL 33137

to appear before the Investigative Subcommittee of the Committee on Ethics, of which the Honorable Andrew R. Garbarino is the Chairman.

U.S. House of Representatives
119th Congress

Served by..

Title ....

Manner of Service ....

Date ....

Signature of Server ....

Address...

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