

COMMITTEE ON  ETHICS

Committee  
Counsel  
Presentation

Adjudicatory Subcommittee Hearing  
March 26, 2026

# Role of the Adjudicatory Subcommittee

- **Committee Rule 23(c):** “The adjudicatory subcommittee shall hold a hearing to determine whether any counts in the Statement of Alleged Violation have been proved by **clear and convincing evidence** and shall make findings of fact, except where such violations have been admitted by respondent.”
- **Committee Rule 23(o):** “Committee counsel or respondent’s counsel may move the adjudicatory subcommittee to make a finding that there is **no material fact at issue**. If the adjudicatory subcommittee finds that there is no material fact at issue, the burden of proof [to establish the facts alleged in the Statement of Alleged Violation by clear and convincing evidence] will be deemed satisfied.”

# Procedural History



# Statement of Alleged Violations: 27 Counts

Category	Count #	Violation
Campaign Finance and Related Criminal and Ethics Rules	1	Conduit Funds from Trinity Health Care Services, LLC
	2	Improper Contributions Falsely Reported as Personal Loans
	3	Failure to Properly Disclose Loans Obtained in Support of Campaign
	4	Failure to Disclose Payments from the Campaign to Respondent
	5	Acceptance of Improper Campaign Contributions from Edwin Cherfilus
	6	Acceptance of Improper Contributions from Respondent's Sister
	7	Acceptance of Improper Campaign Contributions from Nadege LeBlanc
	8	Conduit Funds from Petrogaz-Haiti, S.A., LLC
	9	Acceptance of Improper Campaign Contributions from Leadership in Action PAC
	10	Acceptance of Improper Campaign Contributions from Haitian American Votes PAC
	11	Acceptance of Improper Campaign Contributions from NHAEON
	12	Acceptance of Improper Campaign Contributions from NHAEON Progressive Political Action Committee
	13	Additional Reporting Errors Related to Campaign Contributions and Disbursements
	14	False Reports Filed with the FEC
	15	Money Laundering – Trinity Health Care Services, LLC Funds
	16	Money Laundering – Petrogaz-Haiti S.A., LLC Funds
	17	False Statements
	18	Comingling of Campaign and Personal Funds

Category	Count #	Violation	
Financial Disclosure	19	Failure to File House Financial Disclosure Reports in Connection with the 2018 Election	
	20	Failure to File House Financial Disclosure Reports in Connection with the 2020 Election	
	21	Failure to Timely File House Financial Disclosure Reports After Becoming a Member of Congress	
	22	Failure to Timely File House Financial Disclosure Reports in Connection with the 2022 Special Election	
	23	Reporting Errors and Omissions on House Financial Disclosure Reports	
	House Rules	24	Acceptance of Voluntary Services for Official Work by Individual 1
		25	Acceptance of Voluntary Services Related to Franked Communications by Individual 1
26		Providing Special Favors and Privileges in Connection with Community Project Funding Requests	
Code of Official Conduct	27	Lack of Candor and Diligence in Ethics Investigation	



Sheila Cherfilus-McCormick, JD  
Co-Founder

[Redacted]  
Co-Founder

[Redacted]  
Board Member

[Redacted] MPH  
Board Member

Respondent's Sister  
RN,BSN, NP  
Board Member

[Redacted]  
Board Member

Nadege LeBlanc  
Board Member

February 24, 2021

Re: COVID-19 Vaccination Registration

To: [Redacted],

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

**Project Overview**

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

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

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

Sincerely,

Sheila Cherfilus-McCormick, JD  
Co-Founder, Essential Community Health

Digitally signed by [Redacted]  
DN: dc=org, dc=flsc,  
ou=DEM Users, ou=Director,  
cn=[Redacted], email=[Redacted]  
[Redacted]@trinityflor  
da.com  
Date: 2021.02.27 09:40:04 -05'00'

**2020:** Received \$86,000 annual salary as CEO of Trinity Health Care Services.

**Feb. 2021:** Sought emergency COVID contract on behalf of “Essential Community Health,” shortly after amended to make Trinity the vendor.

**Mar. 2021:** Along with two siblings, formed LLCs to receive Trinity’s expected profits from COVID contract.

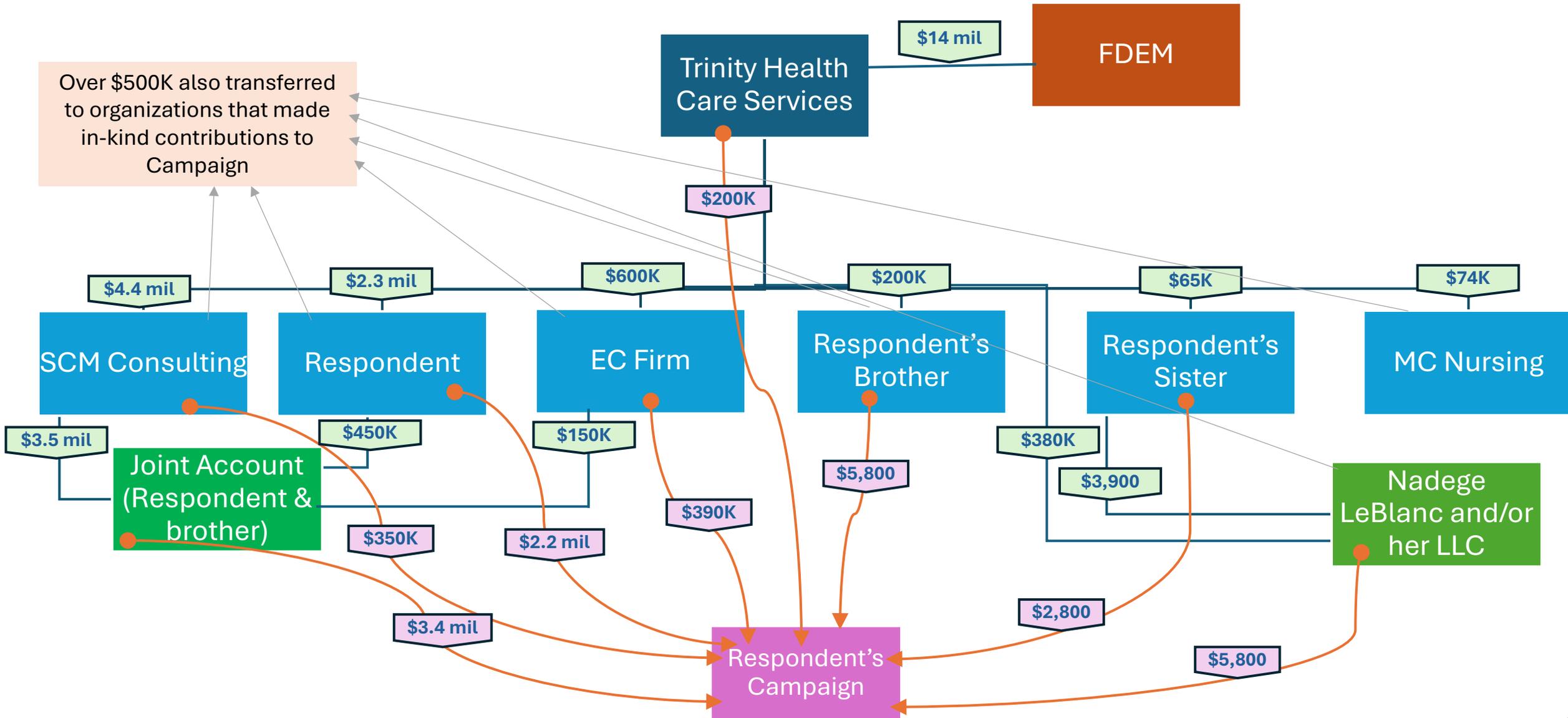
**Apr. 2021 – Sept. 2021:** Trinity received \$14,355,750.28 from Florida Division of Emergency Management.



Date: 3/4/2021  
Re: Addendum: COVID-19 Vaccination Registration

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

# Flow of Trinity Funds 2021-22



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

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

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

⦿ § 100.33 Personal funds.

*Personal funds of a candidate* means the sum of all of the following:

- (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.

**Respondent** June 28, 2021 7:11:56 AM

The max is 2 checks of 2900. That is why **Sister** had to give money to Nadege for her to make another donation

↑ Straw donor scheme

Contemporaneous text messages show Respondent was aware of and understood the federal campaign contribution limits and reporting requirements and schemed to evade them.

Effort to inflate FEC reporting numbers with “loans” →

**Respondent** June 11, 2021 10:17:43 PM  
Goal is 2 million at least 1.5

**Hector Roos** June 11, 2021 10:17:43 PM  
I suggest you move funds in to the campaign account sooner rather than waiting towards the end of the month. This is the one chance to post a big number.

**Respondent** June 11, 2021 10:19:13 PM  
I am not planning on using that amount just leveraging

**Respondent** June 11, 2021 10:19:13 PM  
I think that is a good idea

**Hector Roos** June 11, 2021 10:19:13 PM  
Indeed. But nobody has to know that.

# 2022 Re-Election Funds

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

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

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

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

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

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

[REDACTED] Individual 1 [REDACTED] 4/1/2022, 9:54 AM  
No we are reporting more than a million dollars (long story not getting into it by text)

Original April 2022 Quarterly Report  
(covering 1/1/22 – 3/31/22):

8. Cash on Hand at Close of Reporting Period (from Line 27).....	1675609.43
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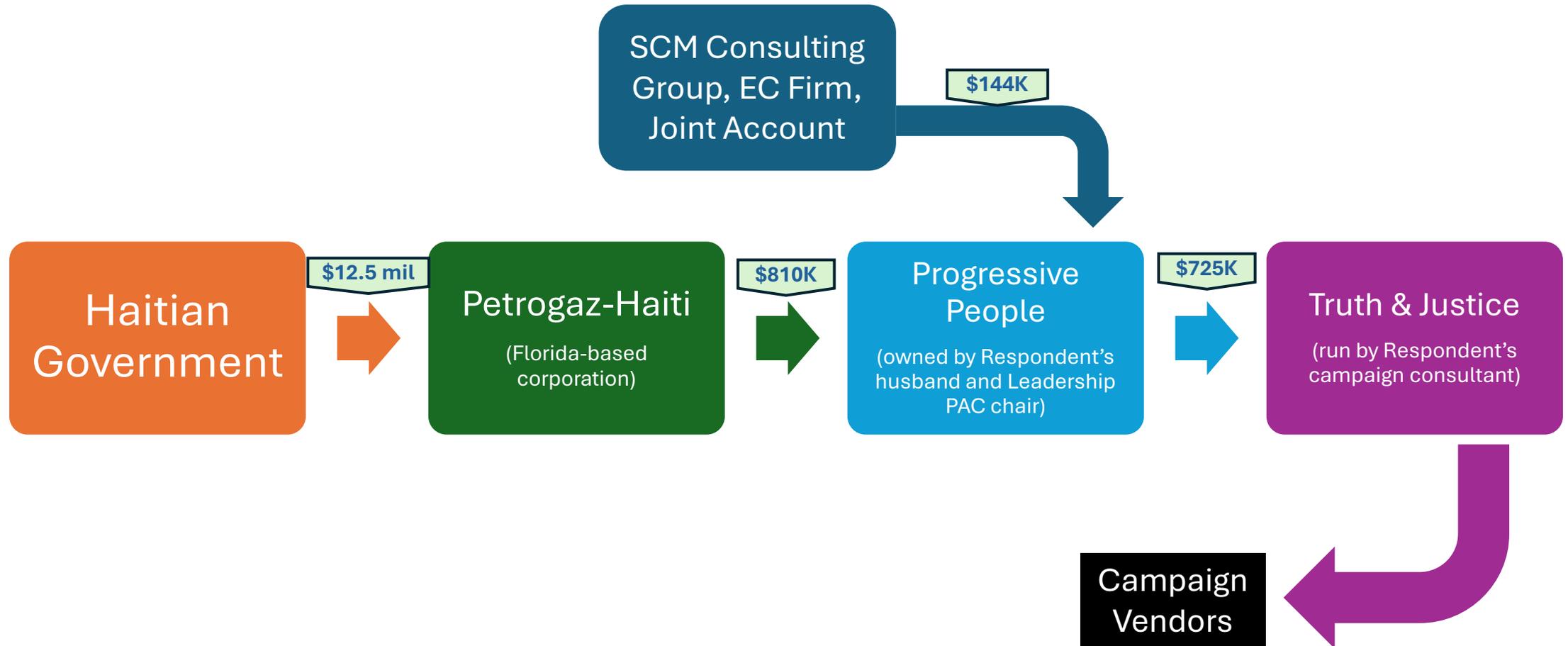
Current Amended April 2022 Quarterly Report, following FEC inquiry:

8. Cash on Hand at Close of Reporting Period (from Line 27).....	396402.99
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Campaign bank  
account statement  
for end of quarter:

Account summary	
Your previous balance as of 02/28/2022	\$-131.51
Checks	- 83,649.53
Other withdrawals, debits and service charges	- 4,242.94
Deposits, credits and interest	+ 115,324.91
Your new balance as of 03/31/2022	= \$27,300.93

# 2022 Re-Election Funds



# Financial Disclosures

- **2018 Election:** No FD filed; 2 extension requests filed
- **2020 Election:** No FDs filed
- **2022 Special Election:** FD filed late
- **2022 New Member FD:** FD filed timely
- **2023 Annual FD:** FD filed late

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

## Sheila Cherfilus-McCormick and her mystery money | Editorial

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By SUN SENTINEL EDITORIAL BOARD  
SOUTH FLORIDA SUN SENTINEL |

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

# Additional Violations

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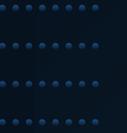
Volunteer services in congressional office from campaign advisor

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Special favors in Community Project Funding request process

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Lack of diligence and failure to meet duty of candor during Investigative Subcommittee investigation



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# COMMITTEE ON ETHICS

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