

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

In the Matter of

REPRESENTATIVE SHEILA CHERFILUS-MCCORMICK,
Respondent.

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**RESPONDENT’S RESPONSE TO
ETHICS COUNSEL’S MOTION FOR SUMMARY JUDGMENT**

NOW COMES Respondent Representative Sheila Cherfilus-McCormick and hereby responds to Ethics Counsel’s Motion For Summary Judgment, stating as follows:

PROCEDURAL BACKGROUND

Counsel to the Office of Congressional Ethics (“The Office”) investigated this matter and crafted a Statement of Alleged Violations asserting twenty-seven (“27”) counts against U.S. Representative Sheila Cherfilus-McCormick. The Office has actual notice that the Respondent has criminal charges pending in the U.S. District Court for the Southern District of Florida. On January 20, 2026, the Respondent’s Counsel, Michael Stroud requested a stay of the proceedings before the Committee on Ethics due to the Respondent’s criminal proceedings. (Pretrial is scheduled for April 20, 2026). Mr. Stroud withdrew from the case shortly after leaving the Respondent without representation. William Barzee entered his appearance in the Respondent’s criminal proceeding on February 3, 2026, and in the Ethics matter on March 2, 2026. Counsel re-asserted the request for a stay and further requested a reasonable time to familiarize himself with the matter. Committee counsel filed a “motion for summary judgment”. The Committee declined the request for stay and scheduled a hearing on the Ethics Counsel’s motion for summary judgment.

SUMMARY JUDGMENT STANDARD

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, summary judgment is proper where “there is no genuine dispute as to any material fact and the moving party is entitled to judgment as a matter of law.” Fed. R. Civ. P. 56(a). “And so, if there clearly exist factual issues that properly can be resolved only by a finder of fact because they may reasonably be resolved in favor of either party, then summary judgment is inappropriate.” *Davis v. Pavlik*, Case No. 20-cv-00547-LKG, 2022 U.S. Dist. LEXIS 162123, *7 (D.Md. Sept. 7, 2022). “When ruling on a motion for summary judgment, the Court must construe the facts alleged in the light most favorable to the party opposing the motion.” *United States EEOC v. Golden Ent., Inc.*, Case No. 20-cv-02811-LKG, 2023 U.S. Dist. LEXIS 108703, *11 (D.Md. Jun. 22, 2023). “The moving party bears the burden of showing that there is no genuine issue as to any material fact and that the party is entitled to judgment as a matter of law.” *Staves v. Pr. George’s County Bd. Of Educ.*, Case No. 19-cv-02262-LKG, 2023 U.S. Dist. LEXIS 52800, *10 (D.Md. Mar. 27, 2023).

This Committee should reject the Ethics Counsel’s Motion for Summary Judgment, which are predicated on their circumscribed description of the evidence. When viewed in the light most favorable to Respondent, the non-moving party, it is plain the material facts and inferences therefrom require summary judgment to be denied on all twenty-seven (27) counts.

I. SUMMARY JUDGMENT IS IMPROPER

Motions for summary judgment are available in civil matters only. *See United States v. O’Connor*, 2025 U.S. Dist. LEXIS 213183, *3 (N.D. TX Oct. 29, 2025). Accordingly, summary judgment is not available in criminal proceedings, and Courts do not permit government to utilize summary judgment to deny a defendant’s right to trial by attempting to adjudicate factual disputes

through pretrial proceedings. Even in civil cases, Courts routinely deny or defer motions for summary judgment where the nonmovant has not had an adequate opportunity to conduct discovery, particularly where simultaneous criminal proceedings limit a party or witness availability due to concerns regarding Fifth Amendment right against self-incrimination.

Fed. Civ. P. 56(d) provides that

“[i]f a nonmovant shows by affidavit or declaration that, for specified reasons, it cannot present facts essential to justify its opposition, the court may:

- (1) Defer considering the motion or deny it;
- (2) Allow time to obtain affidavits or declarations or to take discovery; or
- (3) Issue any other appropriate order.

Summary judgment in this case should be denied primarily because the Committee’s decision to hold a public hearing deprives the Respondent of her Fifth Amendment right against self-incrimination. At the outset, we would be remiss were we to fail to note that the Committee’s decision to require a public summary judgment hearing while a criminal matter is pending is highly unusual and extremely prejudicial to the Respondent’s criminal case. Otherwise, it is well established that “risk of self-incrimination is greatest when significant overlap exists between civil and criminal matters and criminal charges have been filed against defendant.” *Medina v. City of Phila.*, 2020 U.S. Dist LEXIS 216415, * 5 (E.D. Pa. Nov. 19, 2020) (citing *Barker v. Kane*, 149 F.Supp. 3d 521, 529 (M.D. Pa. 2016)). At least one court has acknowledged that when civil and criminal matters were pending simultaneously, “it would not have been feasible” to conduct a civil deposition of a defendant in a criminal matter “because of his Fifth Amendment right to avoid self-incrimination”. *Quartermouse v. Bullitt Co. Fiscal Ct. & Angela Greenup*, 2020 U.S. Dist. LEXIS 154107, *4 (W.D. Ky Aug. 25, 2020).

Additionally, in another matter the “material overlap between the civil and criminal proceedings weighs in favor of granting the requested stay.” *Barker*, 149 F.Supp. 3d at 527. In such matters, “proceeding with discovery will force [the party] to either waive her Fifth Amendment privilege or forfeit her defense on key disputed issues in this civil suit.” *Id.* at 528. The principle of deference to criminal proceedings is sacrosanct. So much so, that the Court has determined that in a matter where the “criminal case prevent[s a party] from having an opportunity to develop and discover evidence... ‘*common sense dictates*’ that the Court should defer consideration of the Defendants’ motion for summary judgment.” *Quartermouse*, 2020 U.S. Dist. LEXIS at *5 (citing *Moore v. Shelby Cty.*, 718 F. App’x 315, 320 (6th Cir. 2017) (Emphasis added). Needless to say, the Respondent’s Fifth Amendment rights must be preserved. This proceeding is essentially alleging the same facts raised in the criminal case. Proceeding with this case would effectively force the Respondent to choose between waiving constitutional protections and forfeiting the ability to mount a full defense. Thus, the summary judgment proceeding here substantially jeopardizes the Respondent’s Fifth Amendment rights.

Due to the overlapping legal proceedings, summary judgment must be denied, or these proceedings must be stayed until the conclusion of the criminal matter to preserve the Respondent’s ability to conduct meaningful discovery and to safeguard her fundamental constitutional rights.

II. GENUINE DISPUTE OF MATERIAL FACTS EXISTS

Even if the Committee were to proceed notwithstanding the substantial authority supporting a stay, summary judgment must be denied because genuine dispute of material facts exists, precluding judgment as a matter of law.

A. Material Factual Disputes Exist Regarding Respondent's Entitlement to the Funds at Issue

The record reflects competing evidence regarding Respondent's entitlement to the funds at issue. There is a genuine dispute concerning the nature, authorization, and intended use of the funds at issue, as well as Respondent's intent, precluding summary judgment on Counts 1 and 2. During the year of 2021, the Respondent was employed as the Chief Executive Officer of Trinity Health Care Services and received a salary for those duties.

In addition, in response to the emergency conditions created by COVID-19 pandemic, Respondent entered into a separate agreement Trinity to undertake on additional responsibilities outside the scope of executive duties, including statewide operational functions. The terms of the agreement, including hourly compensation and profit sharing, are reflected in contemporaneous communications, including a March 5, 2021 email attaching a document titled "Projected Financial Report," and a March 28, 2021 email with a shared note titled "Administrative Cost."

These materials evidence that the compensation structure existed prior to the announcement of any special election and prior to any alleged clerical error by the State of Florida. Moreover, the record reflects that Trinity did not transfer any funds to Respondent's campaign. At minimum, this evidence creates a genuine dispute of material fact as to whether the funds at issue constituted Respondent's earned compensation, rather than conduit contributions or improperly reported loans. Accordingly, summary judgment is precluded under Fed. Civ. P. 56.

B. Genuine Disputes of Material Fact Exist Regarding Respondent's Role, Knowledge, and Responsibility for FEC Reporting

The Committee must deny summary judgment on Counts 3, 13, 14, and 17 because the record reflects genuine disputes of material fact regarding Respondent's role in, and responsibility

for, the preparation and submission of FEC reports. The evidence reflects that Respondent retained individuals she reasonably believed to be qualified to prepare and file such reports, and that the preparation of those filings was not performed personally by Respondent. At a minimum, these facts create a dispute as to Respondent's knowledge, involvement, and intent with respect to the alleged reporting deficiencies, issues that cannot be resolved on summary judgment.

The record further reflects that any identified reporting issues were addressed through a Settlement Agreement reached pursuant to the FEC's Alternative Dispute Resolution ("ADR") program between the campaign committee and the Federal Election Commission. This resolution, and the surrounding circumstances, at minimum create competing inferences regarding the nature, scope, and materiality of any alleged reporting errors, precluding summary judgment as a matter of law.

C. Genuine Disputes of Material Fact Exist Regarding the Effect of the FEC ADR Resolution and Respondent's Compliance

Similarly, summary judgment on Count 4 must also be denied. The existence of, and compliance with, the FEC ADR resolution creates, at minimum, a genuine dispute of material fact as to whether any reporting issues were known, intentional, or otherwise actionable under the standards asserted by Committee Counsel. These determinations require evaluation of intent, credibility, and context, and therefore cannot be resolved on a paper record and therefore, precludes summary judgment as a matter of law.

D. Genuine Disputes of Material Fact Exist Regarding Respondent's Control, Knowledge, and Relationship to the Referenced Political Action Committees

Committee Counsel is not entitled to summary judgment on Count 5 because genuine disputes of material fact exist regarding Respondent's relationship to, and involvement with, the

Political Action Committees referenced by Committee Counsel. At a minimum, the evidence supports competing inferences as to whether Respondent exercised control over, directed, or had knowledge of the fundraising activities attributed to those entities, issues that cannot be resolved on summary judgment.

Additionally, the individual identified in Paragraph 89 was employed by, and compensated through, the campaign during the relevant time period. At a minimum, this creates a genuine dispute of material fact as to the nature of that individual's role, the source of compensation, and whether any relationship existed between that individual and the referenced entity during the relevant period.

These issues implicate questions of control, knowledge, and intent, all of which require evaluation of context and credibility and are therefore inappropriate for resolution on a paper record. The record does not establish the absence of control or knowledge as a matter of law, and these disputed issues must be resolved by a factfinder. Accordingly, summary judgment is precluded under Fed. Civ. P. 56.

E. Genuine Disputes of Material Fact Exist Regarding Respondent's Knowledge of and Involvement with the Referenced Political Action Committees, and Fifth Amendment Constraints

The Committee should reject Counsel's request for summary judgment on Count 6, or in the alternative deferred, because the record reflects genuine disputes of material fact regarding Respondent's knowledge of, and involvement in, the fundraising activities attributed to the referenced Political Action Committees. The evidence supports competing inferences as to Respondent's awareness of the alleged conduct, precluding resolution on summary judgment. These issues must be resolved by a factfinder.

Moreover, as acknowledged by the Ethics Counsel's Motion For Summary Judgment, the allegations concerning purported "straw donor" contributions are the subject of ongoing criminal proceedings. Under these circumstances, Respondent's ability to present a full defense is necessarily constrained by the need to preserve rights under the Fifth Amendment to the United States Constitution. Where a party cannot present essential facts without risking self-incrimination, summary judgment is inappropriate, and relief under Fed. R. Civ. P. 56(d) is warranted.

Thus, the Committee should deny summary judgment or, at a minimum, defer decision on Count 6 until the conclusion of the simultaneous criminal proceedings.

F. Genuine Disputes of Material Fact Exist Regarding Respondent's Alleged Conduct and Fifth Amendment Constraints

Summary judgment on Counts 7 and 15 must be denied or in the alternative deferred, because the allegations underlying this count are the subject of ongoing criminal proceedings. As a result, the record is necessarily incomplete with respect to material facts bearing on Respondent's alleged conduct. Under these circumstances, Respondent's ability to present a full defense is constrained by the need to preserve her constitutional rights under the Fifth Amendment.

G. Genuine Disputes of Material Fact Exist Regarding Respondent's Control Over Referenced Entities and Source of Funds

Summary judgment on Counts 8 and 16 must be denied because genuine disputes of material fact exist regarding Respondent's relationship to, and control over, the entities referenced by Committee Counsel, including Petrogaz-Haiti, Progressive People, or Truth and Justice. The evidence supports competing inferences as to whether Respondent exercised any authority over, directed, or was responsible for the activities attributed to those entities. The record reflects that funds were available to satisfy campaign-related expenses from lawful sources, including

campaign funds and/or personal funds, and that such funds were used for campaign purposes. At a minimum, this creates a genuine dispute of material fact as to the source, characterization, and propriety of the funds at issue.

These issues implicate questions of control, knowledge, and the nature of the funds, all of which require evaluation of context and competing evidence and are therefore inappropriate for resolution through summary judgment.

H. Genuine Disputes of Material Fact Exist Regarding Respondent's Relationship to and Knowledge of Referenced Political Action Committees and Organizations

Similarly, summary judgment on Counts 9 through 12 must be denied because genuine disputes of material fact exist regarding Respondent's relationship to, involvement with, and knowledge of the various Political Action Committees and organizations referenced by Committee Counsel. The evidence supports competing inferences as to whether Respondent exercised control over, directed, or was aware of the activities attributed to those entities.

With respect to certain organizations identified in Counts 10 and 12, the record reflects, at a minimum, a lack of evidence establishing Respondent's involvement or familiarity with those entities sufficient to meet summary judgement burden as a matter of law. These deficiencies, and the competing inferences arising from the record, preclude summary judgment.

Because these claims turn on issues of control, knowledge, and intent, they require evaluation of context and credibility and cannot be resolved on summary judgment. These issues must be resolved by a factfinder.

I. Genuine Disputes of Material Fact Exist Regarding Self-Funding, Loan Status, and FEC Resolution

Summary judgment must be denied with respect to Count 18 because the record reflects genuine disputes of material fact exist regarding the source, characterization, and use of the funds at issue. The evidence reflects that Respondent provided funds to her campaign, including through loans, in connection with her congressional campaigns. At a minimum, this creates a genuine dispute of material fact as to whether the funds constituted personal loans or otherwise permissible campaign-related funding, rather than funds subject to the characterization presented by Committee Counsel.

Similarly to the arguments for Counts 3, 13, 14, and 17, FEC reporting was completed by individuals retained by the Respondent to prepare and submit such filings. At the very least, this creates a genuine dispute of material fact as to Respondent's role, knowledge, and level of involvement in the reporting process, as well as the significance of any alleged reporting deficiencies. Furthermore, the record reflects that issues relating to FEC filings were addressed through a Settlement Agreement reached pursuant to the Federal Election Commission's Alternative Dispute Resolution ("ADR") program. This resolution, at a minimum, creates competing inferences regarding the nature, materiality, and legal significance of any alleged reporting errors. Thus, summary judgment is precluded.

J. Genuine Disputes of Material Fact Exist Regarding Respondent's Knowledge of Disclosure Requirements and Timing of Compliance with Disclosure Requirements

Summary judgment must be denied with respect to Counts 19 through 23 because genuine disputes of material fact exists regarding Respondent's knowledge of applicable financial disclosure requirements and the timing of any alleged deficiencies. The record reflects that Respondent was sworn into office in January 2022, and that the timing of her assumption of office is relevant to the evaluation of her knowledge of, and obligations under, applicable disclosure

rules. The evidence further reflects that Respondent and her employees obtained training regarding applicable rules after she assumed office, and that subsequent actions were taken in connection with compliance and disclosure obligations. This creates a genuine dispute of material fact as to Respondent's knowledge, intent, and the reasonableness of any actions taken in relation to the alleged reporting issues.

The record also reflects that issues relating to disclosures were addressed through processes involving the Federal Election Commission, including resolution through the Alternative Dispute Resolution ("ADR") program. These circumstances create competing inferences regarding the nature, materiality, and legal significance of any alleged deficiencies. Since these claims turn on issues of knowledge, timing, and intent, they require evaluation of context and credibility and cannot be resolved on summary judgment. The record fails to establish the absence of disputed material facts as a matter of law, and these issues must be resolved by a factfinder. Accordingly, summary judgment is precluded.

K. Genuine Disputes of Material Fact Exist Regarding Respondent's Knowledge of Applicable Restrictions and Reliance on Advisor Guidance

Summary judgment on Counts 24 and 25 must be denied because genuine disputes of material fact exist regarding Respondent's knowledge of applicable restrictions and the nature of her interactions with the individual identified by Committee Counsel. The evidence reflects that the individual provided guidance in connection with Respondent's transition into office, and that such interactions occurred in the context of Respondent's role as a newly elected official. At a minimum, the record supports competing inferences as to Respondent's understanding of any applicable restrictions, the scope of the individual's role, and the extent to which Respondent relied on such guidance. These issues create genuine disputes of material fact as to knowledge,

intent, and the reasonableness of Respondent's actions. These determinations require evaluation of context, credibility, and competing evidence and therefore cannot be resolved through summary judgment. These issues must be resolved by a factfinder. Accordingly, summary judgment must be denied.

L. Genuine Disputes of Material Fact Exist Regarding Respondent's Knowledge, Involvement, and the Role of Staff in the Project Approval Process

Summary judgment regarding Count 26 must be denied because genuine disputes of material fact exists regarding Respondent's knowledge of, and involvement in, the project selection and approval process. The evidence reflects that funding requests were received and processed through the congressional office, and that staff were involved in vetting and recommending projects for approval. At a minimum, this creates a genuine dispute of material fact as to Respondent's role in the selection of projects and the extent to which she relied on staff processes. The record further reflects that a legislative staffer engaged in communications and activities relating to project selection that were not fully disclosed to Respondent. In addition, the record reflects that certain communications, including an April 25, 2022 email, were not reviewed by Respondent, and that materials presented to Respondent differed from other versions referenced by Committee Counsel. These facts create competing inferences as to Respondent's knowledge of the matters at issue.

These circumstances create genuine disputes of material fact regarding Respondent's knowledge, involvement, and the extent to which staff actions may be attributed to her. Such issues require evaluation of context, credibility, and competing evidence and therefore cannot be resolved on a paper record. These issues must be resolved by a factfinder. Accordingly, summary judgment must be denied.

M. Genuine Disputes of Material Fact Exist and Fifth Amendment Constraints Preclude Summary Judgment on Count 27 and Warrant Deferral of Proceedings

The Committee must deny summary judgment on Count 27 because factually, the statements are false. The Respondent produced hundreds of thousands of pages of documents in this matter. Otherwise, the Respondent and her Counsel have been responsive to Counsel's requests. Moreover, Counsel's argument here amounts to an *ad hominem* attack on the Respondent and is indicative of Committee Counsel's thought process. The Respondent, who had been under investigation, invoked her Fifth Amendment right with respect to matters before the Committee. Again, this is entirely appropriate and expected under the circumstances. See *Quartermouse*, 2020 U.S. Dist. LEXIS at *5 (citing *Moore v. Shelby Cty.*, 718 F. App'x 315, 320 (6th Cir. 2017); see also, *Medina v. City of Phila.*, 2020 U.S. Dist LEXIS 216415, * 5 (E.D. Pa. Nov. 19, 2020) (citing *Barker v. Kane*, 149 F.Supp. 3d 521, 529 (M.D. Pa. 2016). Because of the criminal proceedings, the Committee should delay the proceedings here and defer to the criminal proceeding as occurs in any fair and neutral process.

For all the reasons stated herein above, summary judgment should be denied.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Case Number: ADR 1111

Source: AD A23-08

Case Name: Sheila Cherfilus-McCormick for Congress, Inc.

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (FEC or the Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Brian G. Svoboda, Esq., representing Sheila Cherfilus-McCormick for Congress, Inc. and Dr. Olubisi O. Aina, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this settlement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission enters into this settlement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this settlement with the Commission.
3. The Reports Analysis Division (RAD) referred Respondents for a series of reporting errors and other FECA violations during the 2021-2022 election cycle. The Committee's errors included, among other items: excessive, prohibited, and other impermissible contributions/transfers; mathematical discrepancies; failure to provide supporting schedules; failure to properly itemize disbursements; and problems with reporting financial activity/FEC Database. RAD additionally referred Respondents for failing to disclose adequate purposes for disbursements, totaling \$116,553.95, on their 2021 12-Day Pre-Special Report.
4. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. 52 U.S.C. § 30109.
5. Each political committee shall itemize on their report payees that aggregate over \$200 in the calendar year and information should include the full name, mailing address, date, amount, and purpose of such expenditure. The purpose means a brief statement or description as to the reason for the expenditure. 52 U.S.C. § 30104(b)(5); 11 CFR §§ 104.3(b)(3)(i)(A), 104.9.

6. Respondents contend that the Committee experienced reporting challenges during the 2021-2022 election cycle. Further, the Committee has hired an external compliance firm to assist with correcting reports from the 2021-2022 election cycle and organizing the Committee's data to assist with future compliance.
7. Dr. Olubisi O. Aina is a Respondent solely in the representative capacity as Treasurer of Sheila Cherfilus-McCormick for Congress, Inc. Representative Sheila Cherfilus-McCormick is not a Respondent in this matter.
8. Respondents, in an effort to avoid similar errors in the future, agree to:
 - a. amend relevant reports as identified by ADR in the Response Guide provided to the Committee to address the 2021-2022 election cycle Request For Additional Information (RFAI) from RAD within six (6) months of the effective date of this settlement;
 - b. certify annually that the Committee continued to retain the services of a compliance firm with the first certification due on the first anniversary of the effective date of this settlement, and the second certification due on the second anniversary of the effective date of this settlement;
 - c. certify that a representative of the Committee participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division within twelve (12) months of the effective date of this settlement; and
 - d. pay a civil penalty of \$5,350 within thirty (30) days of the effective date of this settlement.
9. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this settlement under penalty of perjury pursuant to 28 U.S.C. § 1746.
10. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury (Treasury) for collection.
11. This settlement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this settlement as set forth above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
12. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1111 (AD A23-08), and resolves those issues identified above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Rosa Marshall, Assistant Director
Alternative Dispute Resolution Office

Date Signed

FOR THE RESPONDENTS:

Brian G. Svoboda, Esq.,
Representing Sheila Cherfilus-McCormick
for Congress, Inc. and
Dr. Olubisi O. Aina, Treasurer

Date Signed



Federal Election Commission
UNITED STATES - of - AMERICA

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Disbursements

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Data type: processed

SHEILA CHERFILUS MCCORMICK
FOR CONGRESS, INC
(C00677492)

ROMEU

2021-2022

Spender	Recipient	State	Description	Disbursement date	Amount
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	07/22/2022	\$875.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	07/12/2022	\$800.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	07/06/2022	\$875.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	06/29/2022	\$1,600.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	06/23/2022	\$800.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	06/17/2022	\$800.00

Spender	Recipient	State	Description	Disbursement date	Amount
CONGRESS, INC					
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	06/14/2022	\$875.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	06/07/2022	\$800.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	05/26/2022	\$800.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	05/17/2022	\$3,850.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	05/10/2022	\$800.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	05/03/2022	\$800.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	04/27/2022	\$800.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	04/17/2022	\$3,950.00
SHEILA CHERFILUS MCCORMICK FOR CONGRESS, INC	ROMEU, JEFFREY	FL	WAGES	04/13/2022	\$3,500.00

Spender	Recipient	State	Description	Disbursement date	Amount
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	04/04/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	03/28/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	03/22/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	03/16/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	03/11/2022	\$3,500.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	03/09/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	03/01/2022	\$400.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	02/17/2022	\$1,200.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	02/11/2022	\$3,500.00

Spender	Recipient	State	Description	Disbursement date	Amount
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	02/09/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	02/04/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	01/28/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	01/19/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	01/11/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	01/05/2022	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	01/01/2022	\$3,500.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	12/22/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	12/20/2021	\$875.00

Spender	Recipient	State	Description	Disbursement date	Amount
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	12/20/2021	\$875.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	12/14/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	12/08/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	12/07/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	11/29/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	11/02/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	10/26/2021	\$400.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	10/18/2021	\$4,500.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	10/18/2021	\$800.00

Spender	Recipient	State	Description	Disbursement date	Amount
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	10/14/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	10/07/2021	\$1,000.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	10/07/2021	\$5,500.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	10/05/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	09/28/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	09/21/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	09/14/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	09/14/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	09/03/2021	\$396.54

Spender	Recipient	State	Description	Disbursement date	Amount
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	ROMEU, JEFFREY	FL	WAGES	07/01/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	06/29/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	06/29/2021	\$800.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	06/15/2021	\$1,600.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	06/01/2021	\$1,600.00
<u>SHEILA CHERFILUS</u> <u>MCCORMICK FOR</u> <u>CONGRESS, INC</u>	JEFFREY, ROMEU	FL	WAGES	05/19/2021	\$1,600.00

Results per page:

Showing 1 to 57 of 57 entries



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CONFIRMATION OF COMPLIANCE

ADR Case Number:

Respondent Name:

Effective Date of Agreement:

The Federal Election Commission approved the agreement in the above-referenced case on the effective date noted above. This agreement obligates the above-named Respondent to satisfy the terms to which it agreed. Please forward this completed form including the dates on which Respondents satisfied each of the terms listed below. Multiple submissions of this form are acceptable as each term is completed.

The Respondent hereby confirms that it has completed the following:

Settlement Term	Date Due	Date of Completion

SUBMITTED BY:

Name:

Title:

Date:

New Mail

Save Search

Delete

Archive

Move

Flag

Favorites

FL20SCCherfilus-McCormi...

Inbox 13145

Archive

Drafts 10

Sent

Deleted Items 6096

Conversation History

Junk Email

RSS Subscriptions

Saved Searches

Search Results

All Results



Leblanc, Johanna

Talking Points -- Congress Con... 4/27/22

----- Johanna Leblanc, J.D., L... Inbox



Leblanc, Johanna

FYI: Invite to Color of Care Sc... 4/27/22

(no message preview) Calendar Invites



Leblanc, Johanna

Meeting Forward Notification:... 4/26/22

Your meeting was forwar... Deleted Items



Leblanc, Johanna

Meeting Forward Notification:... 4/26/22

Your meeting was forwar... Deleted Items



Leblanc, Johanna

Community Funding Project... 4/25/22

Additional community funding pr... Inbox



Leblanc, Johanna 1

URGENT; COMMUNITY FUND... 4/25/22

Per your request. Thank you... Inbox



Leblanc, Johanna

FY23 APPROPRIATIONS- RE... 4/25/22

Per your request, please see belo... Inbox



Leblanc, Johanna

Fiscal Year 2022 Grant Anno... 4/25/22

Could you please make sure the r... Inbox



Leblanc, Johanna

GRANT ANNOUNCEMENT- ST... 4/25/22

Hi Charisma, Please make sure o... Inbox



Leblanc, Johanna

Letter from FEMA to Governo... 4/24/22

----- Johanna Leblanc, J.D.,LL... Inbox



Leblanc, Johanna

FIGGERS PROPOSAL 4/22/22

AFFIDAVIT

My name is Deshonae Luster, I am over the age of eighteen and competent to make this affidavit.

I have personal knowledge of the matters stated herein. I attest that there are several matters referenced in the SAV that were solely controlled by Individual 1, and to which the Respondent did not have knowledge.

During the campaign, I was at the campaign office daily and responsible for payroll and payments. I worked directly under Individual 1 at all times. In that role, I had direct exposure to campaign operations, financial processes, and strategic decision-making.

Throughout this period, Individual 1 frequently discussed his prior political experiences. One statement that stood out to me concerns Item 61 in the SAV, which suggests that the Respondent communicated a plan to place a large amount of money and withdraw it the next time. Based on my observations and interactions, this is inconsistent with what I witnessed. Individual 1, not the Respondent, discussed practices such as temporarily inflating or cycling funds to influence perceptions during a campaign. He referenced his past work with Rudy Giuliani in New York and stated that politicians do this to intimidate or "scare" opponents. He also mentioned that campaign finance reports could be amended after the filing period by submitting corrections to the FEC.

Regarding Truth and Justice, Individual 1 was the only person I observed controlling the entity. He appeared to have complete authority over it and explained that it was structured so as not to require the same level of financial reporting as FEC. He also indicated that it was used to fund attack advertisements, including one targeting Barbara Sharief.

Regarding campaign operations, Individual 1 made approximately 95% of all strategic decisions. The Respondent's involvement was limited to expressing general preferences or needs, such as requesting additional signage, shirts, or canvassing efforts. Individual 1 determined the strategy and directed its execution, and I assisted him in carrying out those directives. The Respondent was rarely present in the campaign office and did not participate in administrative or financial tasks. Since she was never in the office, she could not have known how payments were

processed for "Truth and Justice" or "Leadership in Action" cards because we used different cards for different items. A lot of times, cards were selected based on whether something was in front of individual 1. When items needed to be purchased, individual 1 would give me a card, I would make the purchase, or they would make it themselves.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


_____ Date: March 25, 2026

Deshona Luster
Affiant

NOTARY ACKNOWLEDGMENT

STATE OF Florida
COUNTY OF Broward

Sworn to (or affirmed) and subscribed before me by means of physical presence or online notarization, this 25 day of March, 2026, by Deshona Luster, who is:

Personally known to me

Produced identification: Florida Driver's License

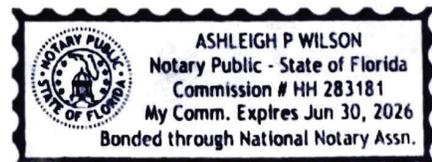


Notary Public, State of Florida

Print Name: Ashleigh P. Wilson

Commission Number: HH 283181

My Commission Expires: June 30, 2026



Projections									
Location	Position	hourly	price	bonus options	bonus amount	weekly	Monthly	End of Contract	
Administrative Cost									
<i>Miami Week 1: 2/28-3/5</i>									
Corporate Administrators	Number of Employees staffed	Hours Per Week	Pay	Overtime	Bonuses	Total			
	Executive Director (Sheld)	84	70		50% of profit	5880			
	Program Operations Director (Edwin)	84	30		20% of Profit	4200			
	Program Manager (Budge)	84	40		10% of Profit	3360			
	Program Manager (Marty)	48	51		30% of Profit	1490			
	Maria Smith								
Miami Site Administrators	Number of Employees staffed	Hours Per Week	Pay	Overtime	Bonuses	Total			
	Project Director (Linda)	84	35			2940			
	Project Coordinator-Miami (Fern)	84	30			2520			
	Site Lead (Marta Hall)	84	32			1930			
On-Site Employees	Number of Employees staffed	Hours Per Week	Pay	Overtime	Bonuses	Total			
	C/SN Clerical	40	20			6720			
	Naval Participants	4	74			7180			
Finders Fees	Per Person	Pay				Total			
Miami	Site Location Recruiter								
Orlando									
Jacksonville									
Tampa									
	Roger								
Travel Office Staff Overtime Sign	Personnel Name	Hours	Pay	Overtime	Bonuses	Total			
	Cheryl								
	Dar								
Background Checks	Location	Number of Background checks completed	Number of Background checks failed	Cost	Total				
Expenses	Item	Cost	Party to Reimburs	Total					
	Hotel Room in Tampa	341.21	Marpolie	341.21					

Projected Expenses Week 1	108,880
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Total Projected Billing Budget	203,400
Chewel (21 employees* 347,751)	171,000
NS of Employees (\$25 x 134,000)	32,400

Profit	94,520
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Corporate Administrator Budget	14920
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Miami Site Administrators	6860
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On-Site Employees	87,000
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Finders Fees	
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Date it was emailed

Sheila Cherfilus <scherfilus@gmail.com>

(no subject)

4 messages

Sheila Cherfilus <scherfilus@gmail.com>

Fri, Mar 5, 2021 at 12:12 PM

To: Mommy Sheila Cherfilus <scherfilus@hotmail.com>

Cc: Edwin Cherfilus <cedwin@thcsi.com>, Edwin Cherfilus <edotcdot@hotmail.com>

Projected Finacial Report.xlsx

Sheila Cherfilus McCormick <scherfilus@hotmail.com>

Sat, Jan 31 at 5:19 AM

To: scherfilus@gmail.com <scherfilus@gmail.com>

[Quoted text hidden]

Projected Finacial Report.xlsx

Sheila Cherfilus McCormick <scherfilus@hotmail.com>

Sat, Jan 31 at 5:21 AM

To: scherfilus@gmail.com <scherfilus@gmail.com>

[Quoted text hidden]

Projected Finacial Report.xlsx

Sheila Cherfilus <scherfilus@gmail.com>

Thu, Mar 26 at 6:48 AM

To: Corlie McCormick <corliemccormickjr@gmail.com>

[Quoted text hidden]

Projected Finacial Report.xlsx

ECIT -



Week 1 Miami FEMA

Week 1-Orlando

Projections

Location	Position	hourly	price	bonus options	bonus amount	weekly	Monthly
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Administrative Cost

Miami Week 1: 2/28-3/5

2021

Corporate Administrators	Number of Employees staffed	Hours Per Week	Pay	Overtime	Bonuses	Total
	Executive Director (Sheila)	84	70		50% of profit	5880
	Program Operations Director (Edwin)	84	50		20% of Profit	4200
	Program Manager(Nadege)	84	40		10% of Profit	3360
	Admin (Marjorie)	40	37		30% of Profit	1480
	Marie Smith					

Miami Site Administrators	Number of Employees staffed	Hours Per Week	Pay	Overtime	Bonuses	Total
	Project Director (Linda)	84	35			2940
<i>last week</i>	Project Coordinator- Miami (Fosie)	84	\$30			2520
	Site Lead (Miss Ball)	60	\$25			1500

OnSite Employees	Number of Employees staffed (Projections)	Hours Per Week	Pay	Overtime	Bonuses	Total
CAN/Clerical	40	84	20			67200
Nurse Practisioners	4	55	90			19800

Finders Fees	Site Location Recruiter	Per Person	Pay	Total
Miami	Goldie			
Orlando				
Jacksonville	Roger			
Tampa				

Trinity Office Staff Overtime Stipen	Personel Name	Hours	Pay	Overtime	Bonuses	Total
	Cherly					
	Tyler					

Background Checks	Location	Number of Background checks completed	Number of Background checks passed	Number of Background Checks Failed	Cost	Total
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Expenses	Item	Cost	Party to Reimburse	Total
	Hotel Room in Tampa	341.21	Marjorie	341.21