

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
SOPHIA GONSALVES-BROWN
1101 14th Street NW, Suite 400
Washington, DC 20005

v. MUR No. _____

SHEILA CHERFILUS-MCCORMICK;
SHEILA CHERFILUS MCCORMICK FOR
CONGRESS, INC. and RANDALL BROZ in
his official capacity as treasurer;
MARK GOODRICH
1 M Street SE, Suite 275
Washington, DC 20003

SCM CONSULTING GROUP, LLC
18612 SW 41st Street
Miramar, FL 33029

LEADERSHIP IN ACTION PAC
5846 South Flamingo Road #522
Cooper City, FL 33330

TRUTH & JUSTICE, INC.
1400 NW 95th Street
Miami, FL 33147

THE EC FIRM, LLC
4593 SW 132nd Ave.
Miramar, FL 33027

COMPLAINT

1. Rep. Sheila Cherfilus-McCormick, who represents Florida’s 20th congressional district in Congress, appears to have violated federal campaign finance laws by transferring or directing over \$250,000 in “soft money”—funds that do not comply with federal contribution limits, source prohibitions, and reporting requirements—through her wholly-owned company, SCM Consulting Group LLC (“SCM Consulting”), to Leadership in Action PAC (“LIA PAC”), a state committee in Florida managed by her de facto federal campaign manager, Mark Goodrich, for the purpose of advancing her campaign for

federal office. Goodrich also appears to have violated the law by acting as Cherfilus-McCormick’s agent with regard to the direction or transfer of soft money in connection with her federal campaign.

2. Additionally, Sheila Cherfilus McCormick for Congress, Inc. (“SCM for Congress”), Cherfilus-McCormick’s authorized campaign committee, appears to have accepted and failed to report prohibited corporate contributions from Truth & Justice Inc. (“TJI”), a Florida not-for-profit corporation. SCM for Congress also failed to report transfers between it and businesses that Cherfilus-McCormick wholly or partly owned, which may have resulted in the conversion of campaign funds to personal use.
3. For over twenty years, the Federal Election Campaign Act (“FECA”) has prohibited federal candidates and officeholders, as well as their agents, from soliciting, receiving, directing, transferring, or spending “soft money” in connection with a federal election. By soliciting, directing, or transferring over \$250,000 of SCM Consulting’s funds to Leadership in Action PAC—which spent the funds in connection with her 2022 special and general elections—Cherfilus-McCormick appears to have brazenly violated these federal campaign finance laws, which are crucial to preventing real and apparent corruption in our federal elections, as well as promoting voters’ right to have a meaningful electoral voice through the democratic process.
4. On September 25, 2023, the Office of Congressional Ethics (“the OCE”) issued a report referring Cherfilus-McCormick to the U.S. House of Representatives Committee on Ethics (“House Ethics Committee”) following a comprehensive investigation. The OCE Board unanimously voted to recommend that the House Ethics Committee further review the allegations against Cherfilus-McCormick, having found “substantial reason to

believe” that: (1) Cherfilus-McCormick made payments to a state political action committee that may have been in connection with her campaign for federal office and that she failed to report these payments as contributions; (2) her primary campaign committee accepted and failed to report excessive contributions; and (3) her primary campaign committee failed to report transactions between its bank account and Cherfilus-McCormick’s businesses.¹

5. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Cherfilus-McCormick, SCM for Congress, Goodrich, SCM Consulting Group, LIA PAC, TJI, and the EC Firm, LLC have violated FECA, 52 U.S.C. § 30101, *et seq.* If the Federal Election Commission (“Commission” or “FEC”), “upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation.”²

FACTUAL BACKGROUND

6. Sheila Cherfilus-McCormick was first elected to the U.S. House of Representatives in a January 2022 special election to fill the seat of the late Rep. Alcee Hastings, in Florida’s 20th congressional district.³ She was reelected in the November 2022 general election

¹ Office of Congressional Ethics Report Review No. 23-7239 at 1–2 (Sep. 25, 2024), https://oce.house.gov/sites/evo-subsites/oce.house.gov/files/evo-media-document/OCE%20Rev.%20No.%2023-7239_Referral.pdf (“OCE Referral”). The OCE additionally recommended that the House Ethics Committee review allegations that Rep. Cherfilus-McCormick’s congressional office received services for official work, including franked communications, from an individual who was not compensated with official funds. *Id.*

² 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

³ *Democrat Cherfilus-McCormick Wins Special Election to Fill House Seat in Florida*, Assoc. Press (Jan. 11, 2022), <https://www.nbcnews.com/politics/elections/democrat-cherfilus-mccormick-wins-special-election-fill-house-seat-florida-n1287339>.

and again in 2024, and she is seeking reelection in 2026.⁴ SCM for Congress is Cherfilus-McCormick’s principal campaign committee, and Randall Broz is its current treasurer.⁵

Its treasurer at the time of the alleged violations was Olubisi Aina.⁶

7. Mark Goodrich was SCM for Congress’s unofficial campaign manager during the 2022 election cycle. In an interview conducted by the OCE, the campaign’s former communications director explicitly referred to Goodrich as the campaign manager.⁷ Another staffer noted that “almost everyone” reported to him, and that while Willis Howard was the campaign’s official campaign manager, Goodrich actually conducted the day-to-day management of the campaign.⁸
8. Goodrich’s role in the campaign involved hiring staff, generating campaign media including television advertisements and mailers, overseeing get-out-the-vote efforts, and directing some campaign strategy.⁹
9. LIA PAC is a state political committee registered in Florida on June 26, 2019. Maria Isabel Garcia Del Rio is listed as the committee’s executive director and treasurer.¹⁰ However, Goodrich also effectively managed LIA PAC during the relevant time period. Goodrich referred to himself as the executive director in a 2022 email soliciting a

⁴ About, *Congresswoman Sheila Cherfilus-McCormick*, <https://cherfilus-mccormick.house.gov/about> (last visited Apr. 3, 2025); Sheila Cherfilus-McCormick, Amend. Statement of Candidacy at 1 (Dec. 19, 2024), <https://docquery.fec.gov/pdf/514/202412199739937514/202412199739937514.pdf>.

⁵ Sheila Cherfilus McCormick for Congress, Inc., Amend. Statement of Org. at 1 (Dec. 16, 2024), <https://docquery.fec.gov/pdf/719/202412169739922719/202412169739922719.pdf>.

⁶ Sheila Cherfilus McCormick for Congress, Inc., Statement of Org. at 1 (Apr. 27, 2018), <https://docquery.fec.gov/pdf/189/201804279111736189/201804279111736189.pdf>; Sheila Cherfilus McCormick for Congress, Inc., Amend. Statement of Org. at 1 (May 19, 2023), <https://docquery.fec.gov/pdf/691/202305199581554691/202305199581554691.pdf>.

⁷ OCE Referral, Interview of Staffer 1 Transcript, July 18, 2023, Ex. 4 at 23-7239_0040 and 23-7239_0047.

⁸ OCE Referral, Interview of Staffer 2 Transcript, July 19, 2023, Ex. 5 at 23-7239_0098-0099.

⁹ OCE Referral at 17.

¹⁰ Leadership in Action, Statement of Org. of Political Comm., FL Dep’t of State Div. of Elections (Jun. 26, 2019) (attached as Exhibit A); Leadership in Action, Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees, FL Dep’t of State Div. of Elections (Jun. 26, 2019) (attached as Exhibit B).

contribution to the committee, and the phone number used on the committee's filings belonged to Goodrich.¹¹

10. SCM Consulting is a Florida limited liability company ("LLC") registered on March 11, 2021, which was wholly owned by Cherfilus-McCormick.¹² The company was voluntarily dissolved on October 31, 2022.¹³
11. The EC Firm, LLC ("EC Firm") is an LLC registered in Florida on March 11, 2021.¹⁴ Edwin Cherfilus, Cherfilus-McCormick's brother, is its manager and registered agent.¹⁵ Cherfilus-McCormick reported a 50% ownership stake in EC Firm on her New Filer financial disclosure report covering calendar year 2021.¹⁶ EC Firm was administratively dissolved on September 27, 2024.¹⁷
12. TJI is a not-for-profit corporation registered in Florida on August 31, 2021.¹⁸ Gary Eugene Beasley is listed as its director and registered agent,¹⁹ though Goodrich had access to its funds and directed payments to vendors on its behalf.²⁰ TJI was administratively dissolved on September 23, 2022.²¹

¹¹ OCE Referral at n. 27.

¹² Hon. Sheila Cherfilus-McCormick, New Filer Report, Clerk of the House of Representatives at 2 (filed Aug. 12, 2022), https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2021/10046839.pdf ("New Filer Report"); *see also* SCM Consulting Group, LLC, Electronic Articles of Org., FL Sec'y of State (Mar. 12, 2021) (attached as Exhibit C) (listing Cherfilus-McCormick as the company's registered agent and manager).

¹³ SCM Consulting Group, LLC, Articles of Dissolution, FL Sec'y of State (filed Oct. 31, 2022), <https://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2022%5C1101%5C96930392.tif&documentNumber=L21000118162>.

¹⁴ The EC Firm, LLC, Detail by Entity Name, FL Dep't of State Div. of Corps. ("EC Firm Registration") (attached as Exhibit D).

¹⁵ *Id.*; *see also* OCE Referral at 21.

¹⁶ New Filer Report at 1.

¹⁷ EC Firm Registration, *supra* note 14.

¹⁸ Truth & Justice Inc., Detail by Entity Name, FL Dep't of State Div. of Corps. ("TJI Registration") (attached as Exhibit E).

¹⁹ *Id.*

²⁰ *See* OCE Referral at 35–38.

²¹ TJI Registration, *supra* note 18.

Payments by SCM Consulting and/or LIA PAC for Campaign Goods or Services

13. Between June 3, 2021, and November 12, 2021, SCM Consulting contributed a total of \$261,424.69 to LIA PAC.²²
14. LIA PAC has reported paying Mark Goodrich just under \$300,000 since 2019, including nearly \$250,000 for “consulting” during the 2022 election cycle.²³
15. SCM for Congress has never reported making any disbursements to Goodrich, despite his provision of considerable services to the campaign as de facto campaign manager during the 2022 election cycle.²⁴
16. These facts appear to indicate that SCM Consulting and/or LIA PAC paid Goodrich for services he provided to SCM for Congress.
17. In addition, the OCE determined that LIA PAC or Goodrich made at least \$17,335.44 in payments for goods and services provided by other vendors to Cherfilus-McCormick’s federal campaign, including banners, a video production studio rental, job postings, a stock media subscription, an attorney’s monthly retainer, and the production and airing of a campaign advertisement.²⁵ The OCE reached its determination after reviewing invoices and other financial records showing that LIA PAC or Goodrich paid bills addressed to the congressional campaign or for goods or services that were displayed publicly by SCM for Congress.²⁶

²² Campaign Contributions to Leadership in Action, 2022 General Election, FL Dep’t of State, Div. of Elections (last visited Apr. 4, 2025) (“LIA PAC Contributions”) (attached as Exhibit F).

²³ Expenditure Query Results for “Leadership in Action” to “Goodrich,” FL Dep’t of State, Div. of Elections (last visited Apr. 4, 2025) (“LIA PAC Expenditures”) (attached as Exhibit G).

²⁴ Disbursements by SCM for Congress to “Goodrich, Mark,” (last visited Apr. 4, 2025), https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00677492&recipient_name=goodrich%2C+mark&max_date=12%2F31%2F2026.

²⁵ OCE Referral at 17–20. Because the OCE’s investigation was limited in scope by the non-cooperation of Cherfilus-McCormick, SCM for Congress, Goodrich, and LIA PAC, it is possible that LIA PAC and/or Goodrich paid for additional goods or services for the campaign committee.

²⁶ *Id.*

18. The OCE could not determine the source of funds paid to LIA PAC by SCM Consulting.²⁷ However, Cherfilus-McCormick’s reported personal income increased by more than \$6 million between 2020 and 2021.²⁸ More than \$5.7 million of this additional income came from SCM Consulting for “consulting fees and profit-sharing fees received for work for Trinity Health Care Services, Inc.”²⁹
19. According to reports that SCM for Congress filed with the FEC, Cherfilus-McCormick loaned her campaign committee over \$6.2 million between 2021 and 2022.³⁰

TJI Payments for Campaign Goods or Services

20. TJI paid \$150,228.64 to Image Plus Graphics, a printing and mailing vendor, on behalf of SCM for Congress between July and August of 2022.³¹ TJI made the payments via wire transfer at Goodrich’s direction.³² Based on the OCE’s analysis, the payments likely exceeded SCM for Congress’s cash-on-hand at the time the transactions were made—even after accounting for the loans Cherfilus-McCormick made to her committee during the same period.³³

²⁷ *Id.* at 11.

²⁸ *Id.* at 20–22.

²⁹ *Id.* Trinity Health Care Services is a Florida company run by Cherfilus-McCormick’s parents, and Cherfilus-McCormick was the company’s chief executive officer until at least 2022. New Filer Report at 3; 2022 Financial Disclosure Report, Hon. Sheila Cherfilus-McCormick, Clerk of the House of Representatives (Aug. 14, 2023), https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2022/10052434.pdf. The State of Florida filed a lawsuit against Trinity Health Care Services in December 2024 alleging that the Florida Division of Emergency Management overpaid the company by over \$5.6 million. Jacqueline Alemany & Clara Ence Morse, *Ethics Worries Grow for Florida Democrat as State Sues Over \$5 Million Covid Payment*, WASH. POST (Jan. 14, 2025), <https://www.washingtonpost.com/politics/2025/01/14/florida-covid-overpayment-cherfilus-mccormick/>.

³⁰ SCM for Congress, Financial Summary, 2021–22, <https://www.fec.gov/data/committee/C00677492/?cycle=2022> (last visited Apr. 4, 2025).

³¹ OCE Referral at 35.

³² *Id.* at 11–12.

³³ *Id.* at 35–40.

21. At least two campaign mailers paid for by TJI contained a disclaimer asserting that the mailers were “paid for by Sheila Cherfilus McCormick for Congress, Inc,” and some of the invoices TJI paid were addressed to SCM for Congress.³⁴
22. Emails and text messages obtained by the OCE during their investigation indicate that Cherfilus-McCormick was personally aware of Goodrich’s involvement in the production of at least one of these mailers, as she specifically requested that he print and distribute the mailer.³⁵
23. SCM for Congress has never reported any disbursements to, or contributions from, TJI.³⁶
- Unreported Transactions Between Cherfilus-McCormick’s Campaign and Businesses*
24. The OCE identified three apparent transfers, totaling \$124,122.51, between SCM for Congress and businesses that Cherfilus-McCormick’s partly or wholly owned—none of which were ever reported to the Commission:
- a. SCM for Congress received \$25,294.51 from either the EC Firm or Cherfilus-McCormick’s personal funds. While SCM for Congress reported refunding these funds to the EC Firm on June 3, 2021, it failed to report the initial transaction.³⁷
 - b. On June 28, 2021, SCM for Congress transferred \$88,828 to SCM Consulting’s bank account and failed to report this disbursement to the Commission.³⁸
 - c. SCM for Congress failed to report an additional \$10,000 transfer to SCM Consulting made on August 17, 2021.³⁹

³⁴ *Id.*

³⁵ *Id.* at 39–40.

³⁶ Disbursements by SCM for Congress to “truth,” https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00677492&recipient_name=truth (last visited Apr. 4, 2025).

³⁷ OCE Referral at 42–43.

³⁸ OCE Referral at 43.

³⁹ *Id.*

SUMMARY OF THE LAW

25. FECA requires that the funds federal candidates and officeholders raise and spend in connection with federal elections comply with federal campaign finance laws.⁴⁰ The Bipartisan Campaign Reform Act of 2002 (“BCRA”) amended FECA to prohibit federal candidates and officeholders, their agents, and any entities that they directly or indirectly establish, finance, maintain or control from raising or spending funds in connection with a federal election outside of FECA’s contribution limits, source prohibitions, and reporting requirements — *i.e.*, so-called “soft money.”⁴¹
26. Specifically, FECA provides, in relevant part:
- 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.⁴²
27. A person is the agent of a federal candidate if they have actual authority, either express or implied, to solicit, receive, direct, transfer, or spend funds in connection with any election.⁴³
28. Under FECA, candidates’ authorized campaign committees must file periodic reports with the Commission disclosing their activity, including, *inter alia*, itemized information

⁴⁰ Under FECA, a “candidate” is defined as “an individual who seeks nomination for election, or election, to Federal office” and crosses the statutory threshold of receiving aggregate contributions, or making aggregate expenditures, in excess of \$5,000. 52 U.S.C. § 30101(2); *see* 11 C.F.R. § 100.3. Federal candidates must file a written statement designating a principal campaign committee within fifteen days of becoming a candidate. 52 U.S.C. § 30102(e)(1); *see* 11 C.F.R. § 101.1(a).

⁴¹ *See generally* 52 U.S.C. § 30125; 11 C.F.R. part 300.

⁴² 52 U.S.C. § 30125(e)(1); *see* 11 C.F.R. § 300.61.

⁴³ 11 C.F.R. § 300.2(b)(3).

regarding individual contributions—including in-kind contributions of goods or services⁴⁴—and disbursements aggregating in excess of \$200 during an election cycle.⁴⁵

29. FECA also prohibits individuals from making contributions to a candidate’s campaign that aggregate in excess of a certain amount per election, and bars any candidate’s authorized campaign committee from accepting excessive contributions.⁴⁶ During the 2022 election cycle, this statutory contribution limit was \$2,900 per election.⁴⁷
30. FECA prohibits corporations and labor unions from making contributions, including in-kind contributions, to candidates or their authorized campaign committees, and bars candidates and their campaigns from knowingly accepting such contributions.⁴⁸

CAUSES OF ACTION

COUNT I:

CHERFILUS-McCORMICK VIOLATED 52 U.S.C. § 30125(E)(1)(A) BY SOLICITING, DIRECTING, OR TRANSFERRING SOFT MONEY TO OR ON BEHALF OF LEADERSHIP IN ACTION PAC IN CONNECTION WITH THE 2022 ELECTIONS

31. The available information, which includes the detailed factual record provided in the OCE’s investigative report, supports finding reason to believe Cherfilus-McCormick violated FECA’s prohibition on federal candidates soliciting, directing, or transferring “soft money” in connection with a federal election.⁴⁹
32. Specifically, the available information indicates that Cherfilus-McCormick directed or transferred nonfederal funds from SCM Consulting, a company that she wholly owns,⁵⁰

⁴⁴ See *id.* § 100.52(d) (defining in-kind contributions).

⁴⁵ 52 U.S.C. § 30104(b).

⁴⁶ *Id.* § 30116(a)(1)(A), (f).

⁴⁷ Contribution Limits for 2021–2022, https://www.fec.gov/resources/cms-content/documents/contribution_limits_chart_2021-2022.pdf.

⁴⁸ 52 U.S.C. § 30118(a).

⁴⁹ See 52 U.S.C. § 30125(e)(1)(A).

⁵⁰ New Filer Report at 2

to LIA PAC, a nonfederal political committee run by Mark Goodrich, which LIA PAC used to pay for goods or services—primarily the cost of Goodrich’s services as de facto campaign manager for Cherfilus-McCormick’s congressional campaign committee—on behalf of SCM for Congress in connection with the 2022 elections.

33. Between June 3, 2021, and November 12, 2021, SCM Consulting, Cherfilus-McCormick’s wholly owned LLC, contributed \$261,424.69 to LIA PAC.⁵¹ LIA PAC, in turn, reported paying Goodrich nearly \$250,000 for “consulting” during the 2022 election cycle.⁵²
34. During that same period, Goodrich served as SCM for Congress’s de facto campaign manager, according to the OCE’s interviews with multiple campaign staffers, one of whom specifically asserted that “‘almost everyone’ who worked on the campaign reported to Goodrich.”⁵³ The OCE’s report indicated that Goodrich was also involved in hiring staff, generating campaign media, overseeing GOTV efforts, and directing campaign strategy.⁵⁴
35. Nevertheless, SCM for Congress never reported making disbursements to Goodrich.⁵⁵
36. These facts, viewed together, support finding reason to believe that LIA PAC paid for Goodrich’s services to SCM for Congress using soft money, which Cherfilus-McCormick directed or transferred to LIA PAC from her wholly owned company, SCM Consulting. SCM for Congress never reported these funds, which clearly compensated Goodrich for

⁵¹ LIA PAC Contributions, *supra* note 22.

⁵² LIA PAC Expenditures, *supra* note 23.

⁵³ OCE Referral at 17 (“Evidence reviewed by the OCE strongly suggests that Mark Goodrich managed the day-to-day operations of the campaigns.”).

⁵⁴ *Id.*

⁵⁵ Disbursements by SCM for Congress to “Goodrich, Mark,” (last visited Apr. 4, 2025), https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00677492&recipient_name=goodrich%2C+mark&max_date=12%2F31%2F2026.

services in connection with the 2022 elections, as contributions or disbursements, as FECA requires. Moreover, the funds used to pay Goodrich may have also violated FECA's contribution limits and source prohibitions.

37. LIA PAC or Goodrich also paid at least \$17,335.44 for various other goods and services—including banners, renting a video production studio, job postings, a stock media subscription, an attorney's monthly retainer, and the production and airing of a campaign advertisement—provided to SCM for Congress.⁵⁶
38. As a federal officeholder and candidate, Cherfilus-McCormick is prohibited from soliciting, directing, or transferring money that does not comply with FECA's requirements in connection with a federal election.⁵⁷ This prohibition extends to Cherfilus-McCormick's campaign, agents, and any other "entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of" Cherfilus-McCormick.⁵⁸
39. By soliciting, directing, or transferring over \$260,000 from her wholly-owned company, SCM Consulting, to LIA PAC, a nonfederal committee, which LIA PAC used to pay Goodrich over \$250,000 during the 2022 election cycle for his services to SCM for Congress, and to potentially pay for goods and services provided by other vendors to SCM for Congress, there is reason to believe Cherfilus-McCormick violated FECA's soft money prohibition.

⁵⁶ OCE Referral at 17–20. Because OCE's investigation was limited in scope by the non-cooperation of Cherfilus-McCormick, SCM for Congress, Goodrich, and LIA PAC, it is possible that LIA PAC and/or Goodrich paid for additional goods or services for the campaign committee.

⁵⁷ 52 U.S.C. § 30125(e)(1)(A); *see id.* § 30118(a).

⁵⁸ *Id.* § 30125(e)(1)(A); *see* 11 C.F.R. § 300.2(b) (defining "agent" to include "any person who has actual authority, either express or implied, to . . . solicit, receive, direct, transfer, or spend funds in connection with any election.").

40. While Cherfilus-McCormick, like any candidate, can contribute or loan an unlimited amount of personal funds to her own federal campaign committee, the record indicates that these funds—aside from never being reported as a contribution or disbursement by her campaign committee—originated not from Cherfilus-McCormick’s personal account but from her wholly-owned company, and were provided not to SCM for Congress but to LIA PAC, a nonfederal committee.
41. As such, the funds clearly did not comply with FECA’s requirements, indicating that Cherfilus-McCormick unlawfully solicited, directed, or transferred soft money—regardless of whether the funds were, in fact, originally her personal funds. Accordingly, there is reason to believe Cherfilus-McCormick violated 52 U.S.C. § 30125(e)(1)(A).

COUNT II:

MARK GOODRICH, AS CHERFILUS-McCORMICK’S AGENT, VIOLATED 52 U.S.C. § 30125(E)(1)(A) BY SPENDING SOFT MONEY FROM LEADERSHIP IN ACTION PAC AND TRUTH AND JUSTICE, INC. IN CONNECTION WITH THE 2022 ELECTIONS

42. Based on the record developed by the OCE, there is also reason to believe that Mark Goodrich, acting as an agent of federal candidate Cherfilus-McCormick, violated 52 U.S.C. § 30125(e)(1)(a) by spending soft money in LIA PAC’s and TJI’s accounts in connection with Cherfilus-McCormick’s 2022 federal campaigns.
43. Goodrich, as de facto campaign manager of SCM for Congress, was Cherfilus-McCormick’s agent. He clearly had at least implied authority to direct, transfer, or spend funds on the campaign’s behalf, as he was making decisions about who to hire, directing elements of the campaign’s strategy, and generating campaign communications,

including television advertisements, mailers, and get-out-the-vote activities—all of which are tasks that involve obligating and disbursing campaign funds.⁵⁹

44. Further, it appears that Goodrich was acting within his capacity as Cherfilus-McCormick's agent when he disbursed money from LIA PAC—a Florida state committee for which he functionally served as executive director⁶⁰—to pay for goods and services provided to SCM for Congress. The payments he directed from LIA PAC to SCM for Congress's vendors were for goods and activities that fell within the tasks he oversaw for the campaign, including public communications and hiring.⁶¹ Some of the invoices Goodrich paid with LIA PAC funds were also directed to SCM for Congress, suggesting he was receiving the invoices in his capacity as SCM's for Congress's campaign manager.⁶²
45. Likewise, Goodrich appears to have been acting as Cherfilus-McCormick's agent when he disbursed funds from TJI, a nonprofit corporation, to pay Image Plus Graphics for mailers produced for SCM for Congress. Again, creating campaign mailers was one of Goodrich's congressional campaign duties,⁶³ and the OCE collected additional evidence showing that certain invoices were made out to the campaign; Cherfilus-McCormick, in

⁵⁹ See 11 C.F.R. § 300.2(b)(3); OCE Referral at 17.

⁶⁰ OCE Referral at n. 27.

⁶¹ See *id.* at 17–19.

⁶² See *id.* at 18–19. Due to Goodrich, Cherfilus-McCormick, and LIA PAC's lack of cooperation with the OCE, the circumstances of LIA PAC's payments for Goodrich's campaign services are not as clear. However, it is possible (and even likely) that Goodrich was also acting as Cherfilus-McCormick's agent in compensating himself for those services.

⁶³ See *id.* at 17.

one instance, even directed Goodrich to send out the mailer and to obtain additional copies for canvassers to deliver at doors.⁶⁴

46. As the available evidence indicates that Goodrich was Cherfilus-McCormick's agent, and acting in that capacity when he spent undisclosed soft money from LIA PAC and TJI on behalf of her congressional campaign to support her federal election, there is reason to believe that Goodrich also violated 52 U.S.C. § 30125(e)(1)(A).

COUNT III:

**SCM FOR CONGRESS VIOLATED ITS REPORTING OBLIGATIONS UNDER FECA,
52 U.S.C. § 30104(B), BY FAILING TO REPORT IN-KIND CONTRIBUTIONS**

47. Based on the foregoing, there is reason to believe that SCM for Congress violated its reporting obligations under FECA, specifically the requirement that it itemize all contributions, including in-kind contributions, and disbursements aggregating in excess of \$200 during an election cycle.
48. As noted above, there is ample evidence that Goodrich provided campaign services to SCM for Congress; indeed, the evidence cited in the OCE report indicates that he was the de facto campaign manager.⁶⁵
49. Nevertheless, SCM for Congress never reported making any disbursements to Goodrich, in clear violation of its reporting obligations under FECA.⁶⁶
50. At the same time, there is evidence that Goodrich was paid by LIA PAC for providing services to SCM for Congress, such that the payments resulted in LIA PAC making in-kind contributions to SCM for Congress.⁶⁷

⁶⁴ See *id.* at 36–40.

⁶⁵ See *supra* ¶¶ 7–8.

⁶⁶ See *supra* ¶ 15.

⁶⁷ See 11 C.F.R. § 100.52(d).

51. Likewise, there is evidence that LIA PAC or Goodrich paid \$17,335.44 for goods and services provided by other vendors to Cherfilus-McCormick's federal campaign, including banners, a video production studio rental, job postings, a stock media subscription, an attorney's monthly retainer, and the production and airing of a campaign advertisement.⁶⁸
52. Under Commission regulations, these payments should have been reported as contributions from, and corresponding disbursements to, LIA PAC.⁶⁹ Nevertheless, SCM for Congress made no such disclosures in its FEC reports. Accordingly, there is reason to believe SCM for Congress violated 52 U.S.C. § 30104(b).

COUNT IV:

**TRUTH & JUSTICE, INC. MADE, AND CHERFILUS-McCORMICK AND
SCM FOR CONGRESS KNOWINGLY ACCEPTED, PROHIBITED AND UNREPORTED
CORPORATE CONTRIBUTIONS, IN VIOLATION OF 52 U.S.C. § 30118(A)**

53. The available information provides reason to believe TJI, a nonprofit corporation, made prohibited corporate contributions to SCM for Congress, and that Cherfilus-McCormick and SCM for Congress in turn knowingly accepted these prohibited contributions.
54. The OCE investigation found that on three separate occasions between July 2022 and August 2022, TJI paid Image Plus Graphics, a printing and mailing vendor, on behalf of SCM for Congress.⁷⁰ In total, TJI paid \$150,228.64 to settle invoices that Image Plus Graphics sent to Mark Goodrich for Cherfilus-McCormick campaign mailers. TJI made each of the three payments via wire transfer at Goodrich's direction.⁷¹

⁶⁸ OCE Referral at 17–20. Because OCE's investigation was limited in scope by the non-cooperation of Cherfilus-McCormick, SCM for Congress, Goodrich, and LIA PAC, it is possible that LIA PAC and/or Goodrich paid for additional goods or services for the campaign committee.

⁶⁹ 11 C.F.R. § 104.13.

⁷⁰ OCE Referral at 35.

⁷¹ *Id.* at 11–12.

55. Emails and texts obtained by the OCE’s investigation indicate that Cherfilus-McCormick was aware of the production of these mailers.⁷² Indeed, the OCE’s report indicates that Cherfilus-McCormick had reviewed at least one mailer and directed Goodrich to print and disseminate it: “In the body of the email, Rep. Cherfilus-McCormick wrote, ‘Mark, Please send this out in the mail immediately! Thank you so much!’”⁷³
56. At least two campaign mailers that TJI paid for featured a disclaimer stating that the mailers were “paid for by Sheila Cherfilus McCormick for Congress, Inc.”⁷⁴
57. The OCE’s analysis indicates that these payments likely exceeded SCM for Congress’s cash on hand at the time the transactions were made—such that SCM for Congress could not have sent these mailers at the time, absent an outside party like TJI paying for them or otherwise transferring funds to the campaign to pay for them.⁷⁵
58. SCM for Congress has never reported any disbursements to, or contributions from, TJI.⁷⁶
59. These facts clearly indicate that TJI, a nonprofit corporation, paid for SCM for Congress’s campaign mailers, at least two of which featured a disclaimer statement falsely asserting that the mailer was paid for by SCM for Congress. Accordingly, there is reason to believe that TJI made, and SCM for Congress knowingly accepted, prohibited corporate contributions in violation of 52 U.S.C. § 30118(a).
60. Further, SCM for Congress appears to have violated its reporting obligations under FECA, as the campaign never reported any contributions from, or corresponding disbursements to, TJI in connection with the in-kind contributions resulting from TJI’s

⁷² *Id.* at 39–40.

⁷³ *Id.* at 40.

⁷⁴ *Id.* at 39–40.

⁷⁵ *Id.* at 35–40.

⁷⁶ *See supra* ¶ 23.

payment for these campaign mailers. Accordingly, there is reason to believe SCM for Congress violated 52 U.S.C. § 30104(b) in connection with these mailers.

COUNT V:

**SCM FOR CONGRESS VIOLATED ITS REPORTING OBLIGATIONS UNDER FECA,
52 U.S.C. § 30104(B), IN CONNECTION WITH TRANSACTIONS BETWEEN
SCM FOR CONGRESS AND CHERFILUS-McCORMICK’S COMPANIES**

61. On three separate occasions, SCM for Congress made and failed to report transfers to or from companies that Cherfilus-McCormick partially or wholly owns, indicating—at a minimum—that the campaign violated its reporting obligations.
62. First, SCM for Congress received and failed to report a contribution of \$25,294.51 from either Cherfilus-McCormick’s personal funds or from the EC Firm. Edwin Cherfilus, Cherfilus-McCormick’s brother, is listed as the EC Firm’s manager and registered agent, and Cherfilus-McCormick reported a 50% ownership stake in the EC Firm in 2021.⁷⁷ While SCM for Congress reported refunding this money to the EC Firm on June 3, 2021, it failed to report the initial transaction.⁷⁸
63. Regardless of whether these funds were transferred from the EC Firm’s general corporate treasury or from Cherfilus-McCormick’s “corporate equity account”—as Edwin Cherfilus asserted in response to the OCE investigators’ inquiry—and regardless of the fact that SCM for Congress reported refunding the EC Firm for the contribution, the campaign failed to initially report the contribution. Accordingly, there is reason to believe that SCM for Congress violated 52 U.S.C. § 30104(b) in connection with this contribution.

⁷⁷ New Filer Report at 1.

⁷⁸ OCE Referral at 42–43.

64. The failure to report this contribution is particularly problematic because the transaction may have been an unlawful corporate contribution. Irrespective of whether the funds originated in the company’s general account or a “corporate equity account,” if the EC Firm, which is an LLC, previously elected to be taxed as a corporation,⁷⁹ then the contribution likely violated FECA’s prohibition of corporate contributions.⁸⁰
65. In addition, SCM for Congress failed to report two other transactions, both of which were transfers to SCM Consulting, the company Cherfilus-McCormick wholly owns. Her campaign transferred \$88,828 to SCM Consulting on June 28, 2021, and transferred \$10,000 to SCM Consulting on August 17, 2021, reporting neither of these transfers.⁸¹ Accordingly, there is reason to believe that SCM for Congress violated 52 U.S.C. § 30104(b) in connection with these transactions.
66. It is unclear, from the available information, what these transfers to SCM Consulting were for—*i.e.*, whether these were disbursements for bona fide campaign purposes, or were personal in nature. If these transfers from SCM for Congress to Cherfilus-McCormick’s wholly-owned company—totaling nearly \$100,000—were made to pay for expenses that would have existed irrespective of Cherfilus-McCormick campaign or official duties as an officeholder, then they resulted in the conversion of campaign funds to personal use, in violation of 52 U.S.C. § 30114(b).

⁷⁹ See 11 C.F.R. § 110.1(g)(3) (an LLC that elects to be taxed as a corporation is treated as a corporation under FECA and Commission regulations).

⁸⁰ See 52 U.S.C. § 30118(a).

⁸¹ OCE Referral at 43.

PRAYER FOR RELIEF

67. Wherefore, the Commission should find reason to believe that Cherfilus-McCormick, SCM for Congress, Goodrich, SCM Consulting, LIA PAC, TJI, and the EC Firm have violated 52 U.S.C. §§ 30104(b), 30114(b), 30118(a), and/or 30125(e), and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
68. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations, injunctive relief to remedy these violations and prohibit any and all future violations, and such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

/s/ Saurav Ghosh
Campaign Legal Center, by
Saurav Ghosh, Esq.
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200

/s/ Sophia Gonsalves-Brown
Sophia Gonsalves-Brown
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200

April 7, 2025

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

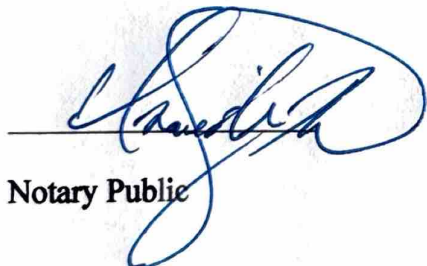
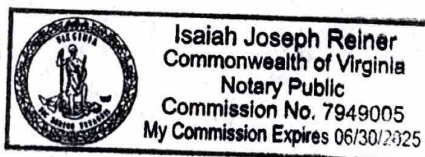
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 4th day of April 2025


Notary Public

City/County of Fairfax
Commonwealth of Virginia
The foregoing instrument was acknowledged
before me this 4th day of April, 2025
By Saurav Ghosh
Notary Public, Commission Exp: 06/30/2025

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Sophia Gonsalves-Brown

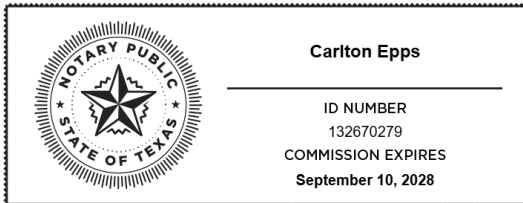
Sophia Elizabeth Gonsalves-Brown

Sophia Gonsalves-Brown

Sworn to and subscribed before me this 4th day of April 2025.



Notary Public



State of Texas
County of Collin

Sworn to and subscribed before me on 04/04/2025 by Sophia Elizabeth Gonsalves-Brown.

Electronically signed and notarized online using the Proof platform.

EXHIBIT A

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY
RECEIVED
DEPARTMENT OF
2019 JUN 27 AM 10:22
DIVISION OF ELECTIONS

1. Full Name of Committee
Leadership in Action

Telephone
305 244 4393

Mailing Address (include city, state and zip code)
5846 South Flamingo Road #522 Cooper City, FL 33330

Street Address (include city, state and zip code)
5846 South Flamingo Road #522 Cooper City, FL 33330

2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)

Name of Affiliated or Connected Organization	Mailing Address	Relationship
None		

3. Area, Scope and Jurisdiction of the Committee

Statewide committee supporting legislative, multi-county, municipal, and local candidates and issues.

4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)

Political

5. Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)

Full Name	Mailing Address	Committee Title or Position
Maria Isabel Garcia Del Rio	5846 South Flamingo Road #522 Cooper City, FL 33330	Treasurer

6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)

Full Name	Mailing Address	Committee Title or Position
Maria Isabel Garcia Del Rio	5846 South Flamingo Road #522 Cooper City, FL 33330	Chairman

7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)

Full Name	Mailing Address	Office Sought	Party
To be determined			

8. List Any Issues this Committee is Supporting: To be determined

List Any Issues this Committee is Opposing: To be determined

9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party

N/A

10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?

Contributed to tax-exempt organizations pursuant to IRS Section 501 (c)(3), committees, parties, and/or otherwise allowed by law.

11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds

Name of Bank or Depository & Account Number	Mailing Address
Wells Fargo Bank	1101 North Krome Ave. Homestead, FL 33030

12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
SS-4	Upon formation	IRS	Ogden, UT 84201
Form 8871, as required	Upon formation	IRS	Ogden, UT 84201
Form 1120-POL, as required	March 15, annually	IRS	Ogden, UT 84201
Form 990, as required	May 15, annually	IRS	Ogden, UT 84201

STATE OF Florida

Broward

COUNTY

I, Maria Isabel Garcia Del Rio, certify that the information in this Statement of

Organization is complete, true and correct.

X 

Signature of Chairman of Political Committee

June 26, 2019

Date

Maria Isabel Garcia Del Rio
5846 South Flamingo Road #522
Cooper City, FL 33330

RECEIVED
DEPARTMENT OF REVENUE
2019 JUN 27 AM 10: 22
DIVISION OF ELECTIONS

June 26, 2019

Ms. Kristi Bronson
Division of Elections
RA Gray Building, Suite 316
500 S. Bronough Street
Tallahassee, FL 32399

Re: Formation Documents for the Political Committee entitled "Leadership in Action" DS-DE 5 edited.

Dear Ms. Bronson:

Enclosed please find formation documents (DS-DE 5) for the creation of the political committee entitled Leadership in Action. We were made aware of a mistake in our original filing by your office. Enclosed is a corrected DS-DE 5 form.

Please do not hesitate to contact me if you have any further questions regarding this submission.

Sincerely,



Maria Isabel Garcia Del Rio

EXHIBIT B

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(2) and 106.021(1), F.S.)

RECEIVED
DEPARTMENT OF
2019 JUN 26 AM 10:21
FLORIDA STATE
DIVISION OF ELECTIONS

CHECK APPROPRIATE BOX:

Initial Filing for: ☒ Primary Treasurer ☐ Deputy Treasurer

OFFICE USE ONLY

Re-filing to Change: ☐ Primary Treasurer ☐ Deputy Treasurer ☐ Primary/Secondary Depository

1. Committee
Leadership in Action

2. Telephone
(305) 244 4393

3. Name of Treasurer or Deputy Treasurer 4. Email (optional)
Maria Isabel Garcia Del Rio

5. Telephone (optional)
()

6. Mailing Address
5846 South Flamingo Road #522 Cooper City, FL 33330

7. Street Address
5846 South Flamingo Road #522 Cooper City, FL 33330

8. The following bank has been designated as the ☒ Primary Depository ☐ Secondary Depository

9. Name of Bank
Wells Fargo Bank

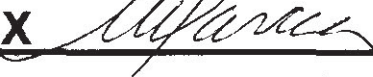
10. Street Address
1101 North Krome Ave

11. City
Homestead

12. State
FL

13. Zip Code
33030

14. Signature of Chairman

X 

15. Name of Chairman (Print or Type)
Maria Isabel Garcia Del Rio

Campaign Treasurer's Acceptance of Appointment

I, Maria Isabel Garcia Del Rio, do hereby accept the appointment as
(Please Print or Type)

treasurer or deputy treasurer for Leadership in Action

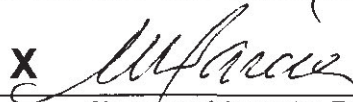
(Committee)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

June 24, 2019

Date

X



Signature of Campaign Treasurer or Deputy Treasurer

EXHIBIT C

**Electronic Articles of Organization
For
Florida Limited Liability Company**

L21000118162
FILED 8:00 AM
March 12, 2021
Sec. Of State
jafason

Article I

The name of the Limited Liability Company is:

SCM CONSULTING GROUP, LLC

Article II

The street address of the principal office of the Limited Liability Company is:

18612 SW 41ST ST.
MIRIMAR, FL. 33029

The mailing address of the Limited Liability Company is:

18612 SW 41ST ST.
MIRIMAR, FL. 33029

Article III

Other provisions, if any:

THE PURPOSE OF SCM CONSULTING GROUP LLC IS FOR BUSINESS AND
HEALTHCARE CONSULTING.

Article IV

The name and Florida street address of the registered agent is:

SHEILA CHERFILUS-MCCORMICK
18612 SW 41ST ST
MIRIMAR, FL. 33029

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: SHEILA CHERFILUS-MCCORMICK

Article V

The name and address of person(s) authorized to manage LLC:

Title: MGR
SHEILA CHERFILUS-MCCORMICK
18612 SW 41ST ST
MIRIMAR, FL. 33029

L21000118162
FILED 8:00 AM
March 12, 2021
Sec. Of State
jafason

Article VI

The effective date for this Limited Liability Company shall be:

03/11/2021

Signature of member or an authorized representative

Electronic Signature: SHEILA CHERFILUS MCCORMICK

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

EXHIBIT D



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Entity Name](#) /

Detail by Entity Name

Florida Limited Liability Company
THE EC FIRM, LLC

Filing Information

Document Number	L21000116371
FEI/EIN Number	86-2545116
Date Filed	03/11/2021
Effective Date	03/10/2021
State	FL
Status	INACTIVE
Last Event	ADMIN DISSOLUTION FOR ANNUAL REPORT
Event Date Filed	09/27/2024
Event Effective Date	NONE

Principal Address

4593 SW 132ND AVE.
MIRIMAR, FL 33027

Mailing Address

4593 SW 132ND AVE.
MIRIMAR, FL 33027

Registered Agent Name & Address

CHERFILUS, EDWIN
4593 SW 132ND AVE
MIRIMAR, FL 33027

Authorized Person(s) Detail

Name & Address

Title MGR

CHERFILUS, EDWIN
4593 SW 132ND AVE.
MIRIMAR, FL 33027

Annual Reports

Report Year	Filed Date
2022	04/22/2022
2023	08/31/2023

Document Images

[08/31/2023 -- ANNUAL REPORT](#)

[View image in PDF format](#)

[04/22/2022 -- ANNUAL REPORT](#)

[View image in PDF format](#)

[03/11/2021 -- Florida Limited Liability](#)

[View image in PDF format](#)

EXHIBIT E



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Entity Name](#) /

Detail by Entity Name

Florida Not For Profit Corporation
TRUTH & JUSTICE INC.

Filing Information

Document Number	N21000010427
FEI/EIN Number	NONE
Date Filed	08/31/2021
State	FL
Status	INACTIVE
Last Event	ADMIN DISSOLUTION FOR ANNUAL REPORT
Event Date Filed	09/23/2022
Event Effective Date	NONE

Principal Address

1400 NW 95TH STREET
MIAMI, FL 33147

Mailing Address

1400 NW 95TH STREET
MIAMI, FL 33147

Registered Agent Name & Address

EUGENE BEASLEY, GARY
1400 NW 95TH STREET
MIAMI, FL 33147

Officer/Director Detail

Name & Address

Title D

EUGENE BEASLEY, GARY
1400 NW 95TH STREET
MIAMI, FL 33147

Annual Reports

No Annual Reports Filed

Document Images

[08/31/2021 -- Domestic Non-Profit](#)

[View image in PDF format](#)

EXHIBIT F



Florida Department of State
Division of Elections

Contributions Query Results

[About the Campaign Finance Data Base](#)

If all contributions for a reporting period are less than 1 dollar they may not be displayed.

Search Criteria:

Detail of Committees

Election Year: 2022 General Election

With Candidate Last Name Starts With: Leadership in Action

Committee Type: All

Candidate/Committee	Date	Amount	Type	Contributor Name	Address	City State Zip	Occupation	I
Leadership in Action (PAC)	12/30/2022	8,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	NOT FOR PROFIT CORPO	
Leadership in Action (PAC)	12/16/2022	5,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	NOT FOR PROFIT CORPO	
Leadership in Action (PAC)	12/06/2022	8,500.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	NOT FOR PROFIT CORPO	
Leadership in Action (PAC)	10/30/2022	15,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	NOT FOR PROFIT CORPO	
Leadership in Action (PAC)	10/30/2022	15,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	NOT FOR PROFIT CORPO	
Leadership in Action (PAC)	10/07/2022	15,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	SOCIAL WELFARE	
Leadership in Action (PAC)	11/17/2022	15,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	NOT FOR PROFIT CORPO	
Leadership in Action (PAC)	11/10/2022	15,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	NOT FOR PROFIT CORPO	
Leadership in Action (PAC)	11/04/2022	15,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	NOT FOR PROFIT CORPO	
Leadership in Action (PAC)	10/14/2022	8,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	SOCIAL WELFARE	
Leadership in Action (PAC)	08/31/2022	50,000.00	CHE	& JUSTICE INC. TRUTH	1400 NW 95TH STREET	MIAMI, FL 33147	SOCIAL WELFARE	
Leadership in Action (PAC)	04/18/2022	42.75	CHE	.COM AMAZON	410 TERRY AVE N SEATTLE	SEATTLE, WA 98109	RETAIL	
Leadership in Action (PAC)	05/27/2021	1,000.00	CHE	AND ASSOCIATES LLC MCDEARMAID	840 NE 127 STREET	NORTH MIAMI, FL 33161	LOBBYIST	
Leadership in Action (PAC)	05/24/2021	2,616.04	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	05/21/2021	200.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	05/17/2021	3,761.32	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	05/03/2021	14,500.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	07/28/2021	12,425.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	07/20/2021	18,670.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	07/16/2021	4,100.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	07/13/2021	9,000.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	07/13/2021	4,748.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	07/07/2021	8,000.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	07/01/2021	4,400.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	11/12/2021	8,200.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	11/08/2021	7,500.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	11/01/2021	18,400.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	10/28/2021	8,000.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	10/22/2021	9,500.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	10/14/2021	8,000.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	10/07/2021	7,951.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	10/05/2021	8,000.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	09/15/2021	13,915.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	09/02/2021	7,000.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	08/19/2021	15,621.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	08/10/2021	12,425.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	08/04/2021	9,216.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	06/24/2021	4,979.25	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	06/18/2021	7,056.64	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	06/17/2021	4,333.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	06/14/2021	8,000.00	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	06/11/2021	9,552.56	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	06/03/2021	11,354.88	CHE	CONSULTING GROUP LLC SCM	18612 SW 41ST ST	MIRAMAR, FL 33029	HEALTH CARE	
Leadership in Action (PAC)	09/15/2021	2,589.84	CHE	ENTERTAINMENT CREATION	217 S. KENWOOD STREET	GLENDALE, CA 91205	ENTERTAINMENT	
Leadership in Action (PAC)	09/15/2021	500.04	CHE	ENTERTAINMENT CREATION	217 S. KENWOOD STREET	GLENDALE, CA 91205	ENTERTAINMENT	
Leadership in Action (PAC)	06/29/2022	20,000.00	CHE	FOR CHILDREN PAC FLORIDA FEDERATION	228 S. WASHINGTON STREET STE 115	ALEXANDRIA, VA 22314	POLITICAL	
Leadership in Action (PAC)	07/08/2022	45,000.00	CHE	FOR CHILDREN PAC FLORIDA FEDERATION	226 S. WASHINGTON STREET STE 115	ALEXANDRIA, VA 22314	POLITICAL	
Leadership in Action (PAC)	07/28/2022	25,000.00	CHE	FOR CHILDREN PAC FLORIDA FEDERATION	226 S. WASHINGTON STREET STE 115	ALEXANDRIA, VA 22314	POLITICAL	
Leadership in Action (PAC)	07/18/2022	25,000.00	CHE	FOR CHILDREN PAC FLORIDA FEDERATION	226 S. WASHINGTON STREET STE 115	ALEXANDRIA, VA 22314	POLITICAL	
Leadership in Action (PAC)	01/19/2022	2,500.00	CHE	GARCIA DEL RIO MARIA ISABEL	12645 MORNING DR, #128	DADE CITY, FL 33525	CONSULTANT	
Leadership in Action (PAC)	04/19/2022	300.00	CHE	GARCIA DEL RIO MARIA ISABEL	12645 MORNING DR, #128	DADE CITY, FL 33525	GRAPHIC ARTIST	
Leadership in Action (PAC)	04/19/2022	200.00	CHE	GARCIA DEL RIO MARIA ISABEL	12645 MORNING DR, #128	DADE CITY, FL 33525	GRAPHIC ARTIST	
Leadership in Action (PAC)	04/06/2022	300.00	CHE	GARCIA DEL RIO MARIA ISABEL	12645 MORNING DR, #128	DADE CITY, FL 33525	GRAPHIC ARTIST	
Leadership in Action (PAC)	01/10/2022	1,300.00	CHE	GOODRICH MARK	5722 S. FLAMINGO #522	COOPER CITY, FL 33330	CONSULTANT	
Leadership in Action (PAC)	09/10/2021	17,000.00	CHE	INITIATIVES URBAN	3642 SW 161 TER	MIRAMAR, FL 33029	CONSULTING	

Leadership in Action (PAC)	08/09/2021	48.17	CHE INSURANCE HISCOX BUSINESS	1001 BRICKELL BAY DR #1804	MIAMI, FL 33131	INSURANCE
Leadership in Action (PAC)	01/26/2022	40,000.00	CHE INVESTMENTS LLC WOODWATER	1101 BRICKELL AVE	MIAMI, FL 33131	REAL ESTATE
Leadership in Action (PAC)	05/26/2021	2,000.00	CHE JACOB FRANCIS	14340 BISCAYNE BLVD.	NORTH MIAMI BEACH, FL 33181	REAL ESTATE
Leadership in Action (PAC)	10/04/2022	5,000.00	CHE KHOURI ROGER	478 BAY LANE	KEY BISCAYNE, FL 33149	SURGEON
Leadership in Action (PAC)	03/17/2021	1,000.00	CHE LAW LLC SPIRITUS	2525 PONCE DE LEON BLVD STE 1080	CORAL GABLES, FL 33134	LAW FIRM
Leadership in Action (PAC)	05/26/2021	500.00	CHE LAW LLC SPIRITUS	2826 PONCE DE LEON BLVD. STE 1060	CORAL GABLES, FL 33134	LEGAL
Leadership in Action (PAC)	07/06/2022	1,900.00	CHE MASSERIA JOHN	13020 SW 30TH CT.	DAVIE, FL 33330	IT
Leadership in Action (PAC)	05/24/2021	10,000.00	CHE MIAMI'S FUTURE BUILDING	9050 PINES BLVD. SUITE 101	PEMBROKE PINES, FL 33024	POLITICAL
Leadership in Action (PAC)	09/27/2022	1,000.00	CHE MITCHELL JAMES	9095 S.W. 87TH AVE. STE 777	MIAMI, FL 33176	INDIVIDUAL
Leadership in Action (PAC)	05/05/2022	6,677.67	CHE PLUS IMAGE	1440 NE 131ST ST	NORTH MIAMI, FL 33161	PRINTER
Leadership in Action (PAC)	07/11/2022	29,686.25	CHE PLUS GRAPHICS IMAGE	1440 NE 131ST ST	NORTH MIAMI, FL 33161	PRINTING
Leadership in Action (PAC)	04/02/2021	385.00	CHE SI PODEMOS LCLAA	815 16TH STREET NW 3RD FLOOR	WASHINGTON, DC 20006	LABOR COUNCIL ASSOCI
Leadership in Action (PAC)	01/20/2021	5,884.38	CHE SI PODEMOS LCLAA	815 16TH STREET NW 3RD FLOOR	WASHINGTON, DC 20006	LABOR COUNCIL ASSOCI
Leadership in Action (PAC)	10/21/2022	35,000.00	CHE VOTES PAC HAITIAN AMERICAN	13719 NW 7TH AVE	MIAMI, FL 33168	POLITICAL
Leadership in Action (PAC)	05/26/2021	250.00	CHE ZALKOWITZ STEVEN	17301 BISCAYNE BLVD LPH-7	NORTH MIAMI BEACH, FL 33160	INVESTOR
Leadership in Action (PAC)	03/17/2021	250.00	CHE ZELKOWITZ STEVEN	17301 BISCAYNE BLVD LPH-7	NORTH MIAMI BEACH, FL 33160	ATTORNEY

Total: 711,238.79

71 Contribution(s) Selected

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EXHIBIT G



Florida Department of State
Division of Elections

Expenditures Query Results

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Search Criteria:

Detail of Committees

Election Year: All

With Committee Name Starts With: leadership in action

Committee Type: All

With Payee Last Name Starts With: Goodrich

Candidate/Committee	Date	Amount	Payee Name	Address	City State Zip	Purpose	Type
Leadership in Action (PAC)	07/03/2019	4,000.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	07/15/2019	975.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	07/19/2019	975.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	07/22/2019	950.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	08/02/2019	2,500.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	IP TARGETING PREP	MON
Leadership in Action (PAC)	08/06/2019	500.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	WEBSITE SERVICES	MON
Leadership in Action (PAC)	08/19/2019	750.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	DATA ACQUISITION	MON
Leadership in Action (PAC)	08/22/2019	650.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	PHONE BANK SET-UP	MON
Leadership in Action (PAC)	08/27/2019	950.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	VOTER TARGETING	MON
Leadership in Action (PAC)	08/29/2019	500.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	GRAPHIC DESIGN	MON
Leadership in Action (PAC)	09/06/2019	2,500.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	MAILER SERVICES	MON
Leadership in Action (PAC)	09/09/2019	500.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	09/11/2019	650.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	VOTER OUTREACH	MON
Leadership in Action (PAC)	09/18/2019	300.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	09/19/2019	950.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	WEBSITE SERVICES	MON
Leadership in Action (PAC)	09/27/2019	500.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	10/01/2019	900.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	10/04/2019	750.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	WEBSITE SERVICES	MON
Leadership in Action (PAC)	10/15/2019	1,100.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	DATA ACQUISITION	MON
Leadership in Action (PAC)	10/18/2019	1,900.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	DATA ACQUISITION	MON
Leadership in Action (PAC)	10/25/2019	1,650.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	WEBSITE SERVICES	MON
Leadership in Action (PAC)	10/30/2019	700.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	10/31/2019	750.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	WEBSITE SERVICES	MON
Leadership in Action (PAC)	11/08/2019	2,950.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	11/15/2019	2,700.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	12/02/2019	1,800.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	12/13/2019	250.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	DATA ACQUISITION	MON
Leadership in Action (PAC)	01/21/2020	480.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	02/11/2020	600.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	02/14/2020	1,294.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	02/18/2020	975.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	08/20/2020	3,000.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	11/01/2020	4,500.00	GOODRICH, MARK	5848 S. FLAMINGO, 522	DAVIE, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	11/20/2020	3,800.00	GOODRICH, MARK	5848 S. FLAMINGO, 522	DAVIE, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	12/04/2020	1,000.00	GOODRICH, MARK	5722 S. FLAMINGO #522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	12/31/2020	300.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	01/04/2021	306.95	GOODRICH, MARK	5846 S FLAMINGO RD # 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	01/04/2021	300.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	01/05/2021	3,900.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	01/11/2021	400.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	01/20/2021	2,750.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	02/01/2021	400.00	GOODRICH, MARK	5846 S. FLAMINGO, #522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	02/04/2021	500.00	GOODRICH, MARK	5846 S. FLAMINGO, #522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	02/11/2021	500.00	GOODRICH, MARK	5846 S. FLAMINGO, #522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	02/18/2021	500.00	GOODRICH, MARK	5846 S. FLAMINGO, #522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	02/22/2021	500.00	GOODRICH, MARK	5846 S. FLAMINGO, #522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	03/22/2021	500.00	GOODRICH, MARK	5846 S. FLAMINGO, 522	COOPER CITY, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	05/04/2021	500.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	DAVIE, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	05/06/2021	500.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	DAVIE, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	05/06/2021	500.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	DAVIE, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	05/08/2021	500.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	DAVIE, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	05/08/2021	500.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	DAVIE, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	05/18/2021	1,000.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	DAVIE, FL 33330	CONSULTING	MON
Leadership in Action (PAC)	05/19/2021	500.00	GOODRICH, MARK	5846 S FLAMINGO RD # 522	DAVIE, FL 33330	CONSULTING	MON

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