

A Closer Look At Rep. Santos' Claims And Potential Charges

By **Maria Cruz Melendez** (February 3, 2023, 5:02 PM EST)

On Jan. 7, Rep. George Santos, R-N.Y. — representing Long Island and northeast Queens — was sworn into office.[1]

Even before taking the oath of office, however, he was the subject of intense scrutiny after The New York Times detailed alleged misrepresentations by Santos, who was at that point congressman-elect, ranging from purported falsehoods about his educational, employment, religious and family background, to claimed inconsistencies regarding his personal income, assets and associated companies.[2]

The Times also reported suspicious activity in connection with Santos' campaign donations and expenditures.[3]



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Since the initial Times article on Dec. 19, additional allegations related to Santos' background, personal finances and campaign have come to light, reportedly garnering interest from law enforcement, including the U.S. Attorney's Office for the Eastern District of New York, the New York Attorney General's Office, and the Nassau County and Queens County District Attorney's Offices.[4]

While it is as yet unclear what specific matters the New York attorney general, Nassau County district attorney and Queens County district attorney might be reviewing, reports that federal prosecutors are looking into some of the alleged financial irregularities[5] come as no surprise given the nature of many of the reported claims.

This article lays out several of the reported allegations against Santos concerning financial irregularities and fraudulent activity, potential legal exposure he may face given the purported conduct, and the possible scope of any federal investigation into the alleged conduct.

This article also discusses prosecutions of multiple former elected officials convicted of — and in many cases, sentenced to imprisonment for — engaging in conduct similar to that which press reports suggest may be attributable to Santos.

Allegations Regarding Personal and Campaign-Related Financial Irregularities

According to a campaign disclosure form submitted by Santos to the Federal Election Commission, Santos loaned his campaign over \$700,000 between 2020 and 2022,[6] and is reported to have donated thousands of dollars to other candidates within the last two years.[7]

In light of Santos' self-reported salary of only \$55,000 and no assets in his 2020 personal financial disclosure U.S. House of Representatives candidate report,[8] among other things, federal prosecutors could be interested in determining the source of funds Santos used to provide such a sum to his and others' campaigns.

A subsequent 2022 financial disclosure report filed by Santos claiming assets valued between \$2.6 million and \$11.25 million — showing considerably higher figures than in the 2020 disclosure — could drive prosecutors to pay close attention to other places Santos reported his income, such as in required disclosure forms to the FEC or the IRS, where criminal penalties can attach to false statements made knowingly and willfully.[9]

Inquiries into Santos' income and assets may also lead prosecutors to look closely at companies associated with Santos and his campaign, including the Devolder Organization, which was at one point described on a campaign website as his family's firm. According to Santos, the firm managed \$80 million in assets and paid him a salary of \$750,000 and over \$1 million in dividends.[10]

Devolder was reportedly founded just weeks after Santos' previous employer, Florida investment firm Harbor City Capital, was accused of engaging in a \$17 million Ponzi scheme by the U.S. Securities and Exchange Commission.[11]

Santos, who is reported as having been a regional director at Harbor City, was not implicated in the SEC charges.[12]

Nonetheless, any probes into Devolder may also cause law enforcement to revisit Santos' history with Harbor City, as well as another company, Red Strategies USA, founded by former Harbor City employees and partially owned by Devolder, according to Red Strategies USA's corporate filings.[13]

Reports suggest that the SEC has already renewed its interest in Harbor City and Santos' role at the company.[14]

Santos' failure to provide any of Devolder's clients in disclosure forms[15] and Devolder's dissolution in September 2022, followed by its reincorporation after The New York Times article, have caused at least one member of Congress to request an investigation into whether Devolder may have been used to funnel illegal campaign donations.[16]

Another organization that prosecutors may seek to investigate based on recent claims is Friends of Pets United, a purported animal rescue charity, which Santos reportedly claimed to run.[17]

Allegations have arisen that the organization, which reports indicate is, in fact, not registered as a charitable organization, has engaged in fundraising for donations that allegedly never made their way to the intended beneficiaries.[18]

Claims also include that Santos' campaign paid \$11,000 to a company called Cleaner 123 listed as "apartment rental for staff" on Santos' campaign disclosure forms and where Santos is reported to have been seen living for at least several months, as well as expenses for a campaign vehicle and approximately \$84,000 on hotels, airfare and car services paid by Santos' campaign funds.[19]

There have also been reports that he listed over 800 expenses under \$200, dozens of which were listed at \$199.99 — one cent below the federal requirement to provide a receipt.[20]

These expenditures could raise red flags for prosecutors, who may investigate whether Santos, or others, have attempted to circumvent reporting requirements in order to conceal the true nature of the expenditures and potential misappropriation of campaign funds for personal use.

Sources of donations to Santos' campaign may also draw scrutiny from prosecutors in light of recent allegations regarding donations by individuals who apparently are, or have ties to, foreign nationals, including a donation by reported Italian national Rocco Oppedisano.[21]

If true, this would constitute a violation of the federal prohibition on receipt of contributions or donations from foreign nationals who do not hold legal residency in the U.S.[22]

Oppedisano — who has multiple convictions, including a conviction by the EDNY related to possession of ammunition[23] and a separate conviction for smuggling undocumented immigrants into the U.S. — is said to have donated \$500 in September 2022 to a victory committee benefiting Santos' campaign, according to FEC records.[24]

Santos' connection to Oppedisano could lead to further inquiry given reports that Oppedisano's relatives also donated to the campaign,[25] and that between 2020 and 2022, during his two bids for office, Santos' campaign reportedly spent over \$25,000 in funds, listed as meeting charges or food and beverage expenditures, at a Queens restaurant run by Oppedisano's brother and niece — who were also appointed to Santos' small business coalition.[26]

In addition, the campaign purportedly still owes the restaurant almost \$19,000 for an election night event.[27]

Other allegations regarding campaign donations include claims made in a complaint filed with the FEC that Santos' campaign improperly obtained over \$113,300 in contributions from 36 donors that exceeded the \$2,900 per election limit.[28]

Another recent complaint lodged against Santos with the Office of Congressional Ethics, the investigative body that reviews allegations of ethical violations by members of the House, claims that Santos solicited campaign contributions in exchange for attending a swearing-in event on U.S. Capitol grounds[29] — a violation of a federal law preventing the use of official resources in connection with campaign activities, if true.[30]

Potentially Applicable Laws and Scope of Federal Investigation

Prosecutors will need to conduct a thorough investigation, of course, before they can decide whether or not to charge Santos with any crimes.

Based on publicly available information and current reports, any probes are likely to seek to identify whether Santos or others associated with him have committed violations, among other potential laws, of:

- Campaign finance and related laws based on false disclosures or omissions to the FEC, receipt of illegal donations and misuse of campaign funds;[31]
- Mail, wire or bank fraud statutes, arising from alleged material misrepresentations to, for example, fraudulently obtain charitable contributions or other donations for Santos' or others' personal use or to illegally finance his or others' campaigns;
- The False Statements Accountability Act, due to alleged misrepresentations in required filings as part of his candidacy for Congress;
- Anti-money laundering and related provisions; and
- The federal tax code, based on the alleged inconsistencies regarding his income and assets and questions concerning sources of funds attributable to Santos.

In addition, if evidence reveals that Santos used his campaign or other organizations and associates to facilitate his alleged conduct, the EDNY, which has a long history prosecuting racketeering cases, may even explore whether charges under the Racketeer Influenced and Corrupt Organizations Act are appropriate.

The list of enumerated predicate offenses under RICO includes wire fraud, mail fraud and bank fraud, among others. This would give federal prosecutors the option to charge some of the above-referenced conduct, not only substantively, but as part of a pattern of racketeering where warranted.

To determine whether any such laws have been violated, prosecutors — in conjunction with local, state and federal law enforcement partners and agencies such as the IRS — are likely to interview witnesses who have or had a relationship with Santos and delve into his financial background.

Federal prosecutors will also request relevant documents from various regulatory agencies, including the FEC, which, according to press reports, has already received a request for documents from the

Public Integrity Section of the U.S. Department of Justice.[32]

In addition to reviewing publicly available information, prosecutors can use the power of the grand jury to compel witnesses to testify and issue subpoenas for documents and materials such as Santos' — and any associated companies' or organizations' — financial and business records, as well as travel-related documents and campaign materials, such as required filings, donor lists, donor pamphlets and disbursement reports.

Even seemingly mundane documents such as telephone records, ride-sharing receipts, restaurant bills and E-ZPass toll records may prove useful in reviewing the claims.

If they meet evidentiary hurdles, prosecutors might choose to seek judicial authorization to search relevant physical premises, email accounts, electronic devices and perhaps even cell site location data to show Santos' and others' locations on various key dates.

If they think it relevant, prosecutors may also seek to obtain information from Brazil — pursuant to a mutual legal assistance treaty — related to theft charges alleging that in 2008 Santos made fraudulent purchases using a checkbook he stole from a man who was being cared for by his mother at the time.[33]

According to the press, Santos confessed to the crime to Brazilian authorities and, as a result, was later charged in 2011 after he had already left to the U.S.[34]

Given the reported interest by the New York attorney general, multiple district attorney's offices and regulators in investigating the allegations, as well as the clear potential for overlap, it will also be important for federal prosecutors to maintain some form of collaboration or communication with the various jurisdictions to prevent inadvertently impeding the progress of their respective inquiries.

Indeed, the DOJ has reportedly asked the FEC to refrain from pursuing any enforcement action against Santos while federal prosecutors conduct their investigation.[35]

Moreover, if Santos wishes to attempt to halt any criminal investigations and avoid potential prosecution altogether by meeting with prosecutors to explain away the allegations, any representations by Santos made during these proffers will certainly be colored by law enforcement's own investigations into these alleged falsehoods.

In the unlikely event Santos chooses to meet with prosecutors voluntarily, material misrepresentations during those meetings may subject him to stand-alone charges of false statements, obstruction of justice and even perjury if made under oath, even where prosecutors may have had insufficient evidence to indict based on the conduct under investigation.

Importantly, alleged falsehoods regarding Santos' background, including his self-proclaimed "sins [of] embellishing [his] resume,"[36] if confirmed, will undoubtedly play a role in any criminal investigations.

Santos is reported to have made misrepresentations about, among other things, having attended and graduated from college, supposedly on a volleyball scholarship; working at two large financial institutions; owning multiple properties; and being a descendant of Jewish Holocaust survivors.[37]

Santos is also claimed to have falsely represented that his mother was a survivor of 9/11 and that four of his former employees were victims of the 2016 Pulse nightclub shooting.[38]

Additionally, reports have noted Santos' alleged history of thousands of dollars of nonpayment in rent and other unpaid debts.[39]

As noted above, these alleged misrepresentations by Santos may hinder his attempts at communication with the government.

In addition, this and other alleged conduct, such as the pending fraud charges in Brazil, even where not chargeable by the government, if admitted to by Santos or independently confirmed by prosecutors, may nevertheless bolster any prosecution of the congressman in a multitude of ways.

For example, in the event of a trial on fraud or other charges, prosecutors may seek to admit prior conduct by Santos as "other acts" evidence pursuant to Federal Rule of Evidence 404(b) to prove his intent or absence of mistake where relevant, and as powerful impeachment evidence that would significantly undermine Santos' credibility were he to take the stand in his defense.

Were Santos to be convicted of any crimes, this uncharged conduct could also serve as potential aggravating factors that prosecutors may cite during a sentencing phase.

In a sentencing phase, the prosecution might point to the number of claimed misrepresentations regarding Santos' background and alleged participation in fraudulent activity, if verified through the government's own investigation, to rebut any argument by Santos that the conduct underlying any conviction was aberrational.

Prosecutions of Elected Officials Convicted of Similar Alleged Conduct

Prosecutions of an elected official for making biographical misrepresentations to potential donors during campaigns is not unheard of in the U.S.

For example, former Rep. Wes Cooley, R-Ore., a one-term U.S. congressman, abandoned his reelection campaign after he was convicted in 1997 of a felony charge under Oregon law and ultimately sentenced to two years of probation and community service for lying about serving in Korea on official state voters' pamphlets mailed to registered voters.[40]

Prosecution for failing to disclose sources of campaign contributions or income, and misuse of campaign funds, is also far from unprecedented, and has in many cases resulted in convictions with terms of imprisonment for the politicians — some significant.

For example, former Rep. George Hansen, R-Idaho, was convicted in 1984 of four felonies for violations of the Ethics in Government Act stemming from his noncompliance with the law's income disclosure requirement, including by failing to disclose over \$87,000 of profit he and his wife made from the silver futures market, on an ethics statement, as well as concealing his family's financial dealings with Texas multimillionaire Nelson Bunker Hunt.[41]

The charges reportedly made Hansen the first public official to be criminally charged with making false statements on annual financial disclosure forms under the Ethics in Government Act.[42]

Hansen was sentenced to concurrent sentences of five to 15 months imprisonment on the four counts, and fined the maximum amount of \$40,000 for falsifying the financial disclosure forms to Congress.[43] His conviction was ultimately vacated by the U.S. Supreme Court in 1995, but by then he was in prison as a result of other charges.

In July 2015, longtime Rep. Chaka Fattah, D-Pa., along with four of his associates, was indicted and convicted of federal RICO charges arising from his role in a racketeering conspiracy involving bribery, concealment of unlawful campaign contributions, and theft of charitable and federal funds.[44]

Fattah was sentenced to 10 years imprisonment, as well as payment of \$600,000 and \$14,500 in restitution and forfeiture, respectively.[45]

Other notable convictions of former members of Congress relating to, among other things, illegal receipt of or misuse of campaign contributions and misreporting of income, include Rep. Jeff Fortenberry, R-Neb.;[46] Rep. Duncan Hunter, R-Calif.;[47] Rep. Steve Stockman, R-Texas;[48][49] Rep. Corrine Brown, D-Fla.;[50] Rep. Jesse Jackson Jr., D-Ill.;[51] and Rep. Richard Tonry, D-La.,[52] who was reported to be the first former congressman to be imprisoned for violating federal campaign finance laws.[53]

All but Fortenberry, who received a sentence of two years of probation, a \$25,000 fine and community service, were sentenced to terms of imprisonment ranging from six months to 10 years.

The EDNY is no stranger to the prosecution of sitting elected officials, having previously successfully

convicted several politicians resulting in prison terms for their respective conduct, including:

- Former Rep. Michael Grimm, R-N.Y., sentenced to eight months;[54]
- Former New York State Senate Majority Leader Pedro Espada Jr., D-Bronx, sentenced to five years;[55]
- Former New York State Senator John Sampson, D-Brooklyn, sentenced to 5 years;[56]
- Former New York State Senator Shirley Huntley, D-Queens, sentenced to one year;[57]
- Former New York State Assemblyman William Boyland Jr., D-Brooklyn, sentenced to 14 years; [58]
- Former New York State Assemblywoman Pamela Harris, D-Brooklyn, sentenced to six months; [59] and
- Former Nassau County Executive Edward Mangano, sentenced to 12 years.[60]

Given the EDNY's experience successfully prosecuting such crimes, prior investigations in these cases and others may prove to be a helpful road map for any investigation into Santos.

Moreover, if the investigation resulted in charges against Santos it would not be unusual for EDNY prosecutors to seek a term of imprisonment in the event of his conviction.

Conclusion

In addition to reports of potential criminal investigations, the recent allegations against Santos have made him the subject of multiple ethics complaints with the FEC and the Office of Congressional Ethics,[61] and have resulted in calls from several members of Congress and others for his resignation.[62]

Notwithstanding Santos' apparent intention to remain in office because, as he told the New York Post, he's "not a criminal,"[63] continued inquiries by Congress, the FEC and law enforcement seem near certain.

Though Santos has largely dismissed many of the claims as untrue or "'stupid things [he's done] in life,'"[64] if prosecuted and convicted, they may not only ultimately cause Santos to lose his seat in Congress, but if history is any indication, could very well cost him his freedom.

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[1] See, e.g., George Santos Gets Sworn In, Officially A Member of Congress, New York Post, Jan. 7, 2023, at <https://nypost.com/2023/01/07/george-santos-sworn-into-congress/>.

[2] See Who is Rep.-Elect George Santos? His Resume May Be Largely Fiction, The New York Times, Dec. 19, 2022, at <https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html>.

[3] See id.

[4] See, e.g., George Santos Faces Federal and Local Investigations, Public Dismay, The New York Times, Dec. 28, 2022, at <https://www.nytimes.com/2022/12/28/nyregion/george-santos-long-island-investigation.html>; N.Y. Attorney General's Office 'Looking Into' Allegations Against George Santos, NBC News, Dec. 22, 2022, at <https://www.nbcnews.com/nbc-out/out-politics-and-policy/ny-attorney-generals-office-looking-allegations-george-santos-rcna62957>; Queens District Attorney Is Third Prosecutor's Office Looking Into George Santos, ABC 7 New York, Dec. 29, 2011, at

<https://www.msn.com/en-us/news/politics/queens-district-attorney-is-third-prosecutor-s-office-looking-into-george-santos/ar-AA15MQ1u?ocid=hplocalnews>.

[5] See, e.g., Federal Prosecutors Are Investigating Rep.-Elect George Santos' Finances, CNN, Dec. 28, 2022, at <https://www.cnn.com/2022/12/28/politics/george-santos-investigating-federal-nassau-county/index.html>.

[6] See FEC Form 3, Report of Receipts and Disbursements, available at <https://docquery.fec.gov/pdf/330/202212089548011330/202212089548011330.pdf>.

[7] See, e.g., Who is Rep.-Elect George Santos? His Resume May Be Largely Fiction, The New York Times, Dec. 19, 2022, at <https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html>.

[8] Santos filed an amended FEC disclosure form on January 24, 2023, declaring that the campaign loan did not come from his personal funds. See Rep. George Santos Now Says Campaign Loan Didn't Come from His Personal Funds, NBC News, Jan. 24, 2023, at <https://www.nbcnews.com/politics/congress/george-santos-now-says-campaign-loan-wasnt-personal-funds-rcna67320>; see also FEC Form 3, Report of Receipts and Disbursements, available at <https://docquery.fec.gov/pdf/692/202301249574937692/202301249574937692.pdf>.

[9] See Title 52, United States Code, Section 30109(a)(11); Title 26, United States Code, Section 7206(a).

[10] Who is Rep.-Elect George Santos? His Resume May Be Largely Fiction, The New York Times, Dec. 19, 2022, at <https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html>.

[11] Id.

[12] Id.

[13] Id.

[14] See Justice Department Asks FEC to Stand Down As Prosecutors Probe Santos, The Washington Post, Jan. 27, 2023, <https://www.washingtonpost.com/investigations/2023/01/27/santos-doj-investigation-fec/>.

[15] Id.

[16] See, e.g., George Santos Tries to Explain His Wealth, Semafor, Dec. 28, 2022, at <https://www.semafor.com/article/12/28/2022/george-santos-tries-to-explain-his-wealth>.

[17] See, e.g., Here's Every Single Lie Told By George Santos, New York Magazine, Jan. 25, 2023, at <https://nymag.com/intelligencer/2023/01/the-everything-guide-to-george-santoss-lies.html>.

[18] See, e.g., Who is Rep.-Elect George Santos? His Resume May Be Largely Fiction, The New York Times, Dec. 19, 2022, at <https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html>; Here's Every Single Lie Told By George Santos, New York Magazine, Jan. 25, 2023, at <https://nymag.com/intelligencer/2023/01/the-everything-guide-to-george-santoss-lies.html>.

[19] See, e.g., Santos, A Suburban House and \$11,000 in Campaign Payments for 'Rent', The New York Times, Dec. 29, 2022, at <https://www.nytimes.com/2022/12/29/nyregion/george-santos-campaign-finance.html>; Here's Every Single Lie Told By George Santos, New York Magazine, Jan. 25, 2023, at <https://nymag.com/intelligencer/2023/01/the-everything-guide-to-george-santoss-lies.html>.

[20] Id.

[21] See, e.g., George Santos' Backers Include A Migrant Smuggler, A Big Trump Donor And The Cousin Of A Sanctioned Russian Oligarch, CBS News, Jan. 13, 2023, at

<https://www.cbsnews.com/news/george-santos-donors-what-we-know/>.

[22] See Title 52, United States Code, Section 30121.

[23] **United States v. Oppedisano** , Dkt. No. 09-CR-305 (JS) (E.D.N.Y.).

[24] See, e.g., George Santos' Backers Include A Migrant Smuggler, A Big Trump Donor And The Cousin Of A Sanctioned Russian Oligarch, CBS News, Jan. 13, 2023, at <https://www.cbsnews.com/news/george-santos-donors-what-we-know/>.

[25] See Federal Election Commission, Individual Contributions, Devolder-Santos for Congress, at https://www.fec.gov/data/receipts/individual-contributions/?committee_id=C00721365&contributor_name=oppedisano; see also George Santos' Backers Include A Migrant Smuggler, A Big Trump Donor And The Cousin Of A Sanctioned Russian Oligarch, CBS News, Jan. 13, 2023, at <https://www.cbsnews.com/news/george-santos-donors-what-we-know/>.

[26] See, e.g., George Santos' Backers Include A Migrant Smuggler, A Big Trump Donor, And the Cousin Of A Sanctioned Oligarch, CBS News, Jan. 13, 2023, at <https://www.cbsnews.com/news/george-santos-donors-what-we-know/>.

[27] See Federal Election Committee, Schedule D, Debts and Obligations, available at <https://docquery.fec.gov/cgi-bin/forms/C00721365/1669998/sd/10>; see also George Santos' Backers Include A Migrant Smuggler, A Big Trump Donor, And The Cousin Of A Sanctioned Oligarch, CBS News, Jan. 13, 2023, at <https://www.cbsnews.com/news/george-santos-donors-what-we-know/>.

[28] See, e.g., Santos Target of Another Watchdog Complaint Alleging Misuse of Campaign Funds, ABC News, Jan. 13, 2023, at <https://abcnews.go.com/Politics/santos-target-watchdog-complaint-alleging-misuse-campaign-funds/story?id=96419585>; see also Federal Election Commission, Contribution Limits for 2021-2022, at <https://www.fec.gov/updates/contribution-limits-2021-2022/>.

[29] See, e.g., More Controversy For Rep.-Elect George Santos: Charging Hundreds To Attend Swearing In, NBC New York, Jan. 2, 2023, at <https://www.nbcnewyork.com/news/politics/more-controversy-for-rep-elect-george-santos-charging-hundreds-to-attend-swearing-in/4024788/>; Request for Investigation Regarding Representative George Santos Use of House Resources for Political Purposes, Jan. 9, 2023, available at <https://endcitizensunited.org/wp-content/uploads/2023/01/Santos-OCE-Complaint.pdf>.

[30] See Title 5, United States Code, Section 7323 (Hatch Act); see also General Prohibition Against Using Official Resources For Campaign Or Political Purposes, United States House of Representatives Committee On Ethics, at <https://ethics.house.gov/campaign/general-prohibition-against-using-official-resources-campaign-or-political-purposes>.

[31] Notably, the FEC holds jurisdiction to enforce and penalize civil violations of the Federal Election Campaign Act (FECA); however, knowing and willful violations of FECA may be prosecuted criminally. See Title 52, United States Code, Section 30101, et seq.

[32] See, e.g., Justice Department Asks FEC to Stand Down As Prosecutors Probe Santos, The Washington Post, Jan. 27, 2023, <https://www.washingtonpost.com/investigations/2023/01/27/santos-doj-investigation-fec/>.

[33] See, e.g., Who is Rep.-Elect George Santos? His Resume May Be Largely Fiction, The New York Times, Dec. 19, 2022, at <https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html>.

[34] See, e.g., id.

[35] See Justice Department Asks FEC to Stand Down As Prosecutors Probe Santos, The Washington Post, Jan. 27, 2023, <https://www.washingtonpost.com/investigations/2023/01/27/santos-doj-investigation-fec/>.

[36] See, e.g., Liar Rep.-elect George Santos Admits Fabricating Key Details of His Bio, New York

Post, Dec. 26, 2022, at <https://nypost.com/2022/12/26/rep-elect-george-santos-admits-fabricating-key-details-of-his-bio/>.

[37] *Id.*; see also George Santos Claims He Played On Baruch Volleyball Team in 2020 Interview, New York Post, Jan. 17, 2023, at <https://nypost.com/2023/01/17/santos-claims-he-played-on-baruch-volleyball-team-in-2020-interview/>.

[38] See, e.g., Immigration Records Contradict Santos' Claim His Mother Was At World Trade Center On 9/11, CNN, Jan. 18, 2023, <https://www.cnn.com/2023/01/18/politics/santos-mother-9-11-claim-immigration-records/index.html>; Here's Every Single Lie Told By George Santos, New York Magazine, Jan. 25, 2023, at <https://nymag.com/intelligencer/2023/01/the-everything-guide-to-george-santos-lies.html>.


[39] See, e.g., Liar Rep.-elect George Santos Admits Fabricating Key Details of His Bio, New York Post, Dec. 26, 2022, at <https://nypost.com/2022/12/26/rep-elect-george-santos-admits-fabricating-key-details-of-his-bio/>.

[40] See, e.g., Wes Cooley, Oregon Congressman Who Dropped Re-election Bid Amid Scandal, Dies at 82, The Oregonian, Feb. 5, 2015, at https://www.oregonlive.com/politics/2015/02/wes_cooley_oregon_congressman.html. Notably, Cooley was subsequently sentenced to one year in prison in 2012 after pleading guilty to tax evasion charges in connection with a \$10 million investment fraud scheme. *Id.*

[41] See, e.g., Rep. George Hansen, The First Congressman Indicted For Violations, UPI, Nov. 3, 1983, at <https://www.upi.com/Archives/1983/11/03/Rep-George-Hansen-the-first-congressman-indicted-for-violations/6932436683600/>; Rep. Hansen Pleads Not Guilty, The New York Times, Apr. 6, 1983, at <https://www.nytimes.com/1983/04/16/us/rep-hansen-pleads-not-guilty.html>.

[42] See, e.g., Hansen Gets Prison Term For Ethics Violation, The New York Times, June 16, 1984, at <https://www.nytimes.com/1984/06/16/us/hansen-gets-prison-term-for-ethics-act-violation.html>.

[43] See, e.g., *id.*

[44] See **United States v. Fattah, et al** , Dkt. No. 15-CR-346 (HB) (E.D.Pa.); see also Congressman Chaka Fattah And Associates Charged With Participating in Racketeering Conspiracy, Press Release, Dept. of Justice, Jul. 29, 2015, at <https://www.justice.gov/opa/pr/congressman-chaka-fattah-and-associates-charged-participating-racketeering-conspiracy>;


[45] See, e.g., Former Congressman Chaka Fattah Sentenced to 10 Years In Prison For Participating in Racketeering Conspiracy, Press Release, Dept. of Justice, Dec. 12, 2016, at <https://www.justice.gov/opa/pr/former-congressman-chaka-fattah-sentenced-10-years-prison-participating-racketeering>.

[46] See *United States v. Fortenberry*, Dkt. No. 21-CR-491 (SB) (C.D.Ca.); see also Congressman Jeff Fortenberry Found Guilty of Concealing Facts and Lying to Investigators Probing Illegal Campaign Contributions, Press Release, U.S. Attorney's Office for the Central District of California, Mar. 24, 2022, at <https://www.justice.gov/usao-cdca/pr/congressman-jeff-fortenberry-found-guilty-concealing-facts-and-lying-investigators>; Former Rep. Jeff Fortenberry Sentenced To Two Years Probation For Lying to FBI, Politico, June 28, 2022, at <https://www.politico.com/news/2022/06/28/former-rep-jeff-fortenberry-sentenced-to-2-years-probation-for-lying-to-fbi-00042834>.

[47] See *United States v. Hunter, et al.*, Dkt. No. 18-CR-3677 (TJW) (S.D.Ca.); see also Congressman Duncan D. Hunter Pleads Guilty to Stealing Campaign Funds, Press Release, U.S. Attorney's Office for the Southern District of California, Dec. 3, 2019, at <https://www.justice.gov/usao-sdca/pr/congressman-duncan-d-hunter-pleads-guilty-stealing-campaign-funds>; Former Congressman Duncan D. Hunter Sentenced to 11 Months in Prison For Stealing Campaign Funds, Press Release, U.S. Attorney's Office for the Southern District of California March 17, 2020, at <https://www.justice.gov/usao-sdca/pr/former-congressman-duncan-d-hunter-sentenced-11-months-prison-stealing-campaign-funds>.

[48] See *United States v. Stockman*, Dkt. No. 17-CR-116 (LHR) (S.D.Tx); see also Former U.S. Congressman Sentenced to 10 Years In Prison For Extensive Fraud, Tax and Election Crimes Scheme, Press Release, Dept. of Justice, Nov. 7, 2018, at <https://www.justice.gov/opa/pr/former-us-congressman-sentenced-10-years-prison-extensive-fraud-tax-and-election-crimes>.

[49] Stockman's sentence was commuted by President Donald Trump. See *Trump Commutes Sentence for Steve Stockman, Former Texas Congressman convicted of Charity Scheme*, Houston Chronicle, Dec. 23, 2020, at <https://www.houstonchronicle.com/news/houston-texas/houston/article/Trump-pardons-Steve-Stockman-former-Texas-15823273.php>.


[50] See *United States v. Brown* , Dkt. No. 16-CR-93 (TJC) (M.D.FI.); see also Former Congresswoman Corrine Brown Pleads Guilty To Corrupt Obstruction Of The Administration Of The Internal Revenue Laws, Press Release, U.S. Attorney's Office for the Middle District of Florida, May 19, 2022, at <https://www.justice.gov/usao-mdfl/pr/former-congresswoman-corrine-brown-pleads-guilty-corrupt-obstruction-administration>; Ex-Florida Democratic Rep. Corrine Brown Sentenced for Mail, Wire and Tax Fraud Involving Sham Charity, Fox News, Dec. 4, 2017, at <https://www.foxnews.com/politics/ex-florida-democratic-rep-corrine-brown-sentenced-for-mail-wire-and-tax-fraud-involving-sham-charity>.


[51] See Former Congressman Jesse L. Jackson, Jr. Pleads Guilty To Conspiring To Defraud Campaign Of More Than \$750,000, Press Release, U.S. Attorney's Office for the District of Columbia, Feb. 20, 2013, at <https://www.justice.gov/usao-dc/pr/former-congressman-jesse-l-jackson-jr-pleads-guilty-conspiring-defraud-campaign-more>; Former Congressman Jessie L. Jackson, Jr. Sentenced, Press Release, U.S. Attorney's Office for the District of Columbia, Aug. 14, 2013, at <https://www.justice.gov/usao-dc/pr/former-congressman-jesse-l-jackson-jr-sentenced>.


[52] See, e.g., Ex-Rep. Tonry Is Indicted on Funds Charges, The Washington Post, May 13, 1977, at <https://www.washingtonpost.com/archive/politics/1977/05/13/ex-rep-tonry-is-indicted-on-funds-charges/1d947488-f10e-4a7c-b850-1a6b7ca989b6/>; Former U.S. Rep. Richard "Rick" A. Tonry Dies At 77 Years Old, NOLA.Com, Jul. 6, 2012, at https://www.nola.com/news/article_2591b371-c4ea-5f6c-8701-d3c80844abb5.html.


[53] In 1986, Tonry was later also convicted of attempting to bribe a Native American Indian chief to allow high-stakes bingo games on his reservation. See *Former Congressman Sentenced to Prison*, UPI, June 11, 1986, at <https://www.upi.com/Archives/1986/06/11/Former-congressman-sentenced-to-prison/6498518846400/>.


[54] See *United States v. Grimm*, Dkt. No. 14-CR-248 (PKC) (E.D.N.Y.); see also Former United States Congressman Michael Grimm Sentenced to Eight Months For Tax Fraud, Press Release, U.S. Attorney's Office for the Eastern District of New York, Jul. 17, 2015, at <https://www.justice.gov/usao-edny/pr/former-united-states-congressman-michael-grimm-sentenced-eight-months-tax-fraud>.


[55] See *United States v. Espada* , Dkt. No. 10-CR-985 (FB) (E.D.N.Y.); see also Former New York State Senate Majority Leader Pedro Espada, Jr. Sentenced To Five Years' Imprisonment, Press Release, U.S. Attorney's Office for the Eastern District of New York, June 14, 2013, at <https://www.justice.gov/usao-edny/pr/former-new-york-state-senate-majority-leader-pedro-espada-jr-sentenced-five-years>.

[56] See *United States v. Sampson* , Dkt. No. 13-CR-269 (DLI) (E.D.N.Y.); see also Former New York State Senator John L. Sampson Sentenced To 5 Years For Obstruction Of Justice And Making False Statements To The FBI, Press Release, U.S. Attorney's Office for the Eastern District of New York, Jan. 18, 2017, at <https://www.justice.gov/usao-edny/pr/former-new-york-state-senator-john-l-sampson-sentenced-5-years-obstruction-justice-and>.

[57] See *United States v. Huntley* , Dkt. No. 13-CR-54 (JBW) (E.D.N.Y.); see also Former New York State Senator From Queens Pleads Guilty to Conspiring to Defraud State of Over \$87,000, Press Release, U.S. Attorney's Office for the Eastern District of New York, Jan. 30, 2013, at <https://www.justice.gov/usao-edny/pr/former-new-york-state-senator-queens-pleads-guilty-conspiring-defraud-state-over-87000>; One-Year Prison Sentence For An Ex-State Senator Who Taped Her Colleagues, The New York Times, May 9, 2013, at <https://www.nytimes.com/2013/05/10/nyregion/huntley-is-sentenced-to-a-year-in-prison.html>.

[58] See *United States v. Boyland* , Jr., Dkt. No. 11-CR-850 (WFK) (E.D.N.Y.); see also Former New York State Assemblyman William F. Boyland, Jr. Sentenced To 14 Years For Bribery, Fraud, Extortion, Conspiracy, And Theft, Press Release, U.S. Attorney's Office for the Eastern District of New York, Sept. 17, 2015, at <https://www.justice.gov/usao-edny/pr/former-new-york-state-assemblyman-william-f-boyland-jr-sentenced-14-years-bribery-fraud>.

[59] See *United States v. Harris* , Dkt. No. 18-CR-11 (JBW) (E.D.N.Y.); see also Former Brooklyn Assemblywoman Sentenced to Prison For Multiple Fraud Schemes And Witness Tampering, Press Release, U.S. Attorney's Office for the Eastern District of New York, Oct. 24, 2018, at <https://www.justice.gov/usao-edny/pr/former-brooklyn-assemblywoman-sentenced-prison-multiple-fraud-schemes-and-witness>.

[60] See *United States v. Mangano* , et al., Dkt. No. 16-CR-540 (S-2) (JMA) (E.D.N.Y.); see also Former Nassau County Executive Edward Mangano And His Wife Linda Mangano Sentenced for Corruption and Related Charges, Press Release, U.S. Attorney's Office for the Eastern District of New York, Apr. 14, 2022, at <https://www.justice.gov/usao-edny/pr/former-nassau-county-executive-edward-mangano-and-his-wife-linda-mangano-sentenced>.

[61] See, e.g., Request for Investigation Regarding Representative-elect George Santos Failing to File Timely, Accurate, and Complete Financial Disclosure Reports, Jan. 9, 2023, available at <https://endcitizensunited.org/wp-content/uploads/2023/01/Santos-DOJ-Complaint.pdf>; Request for Investigation Regarding Representative George Santos Use of House Resources for Political Purposes, Jan. 9, 2023, available at <https://endcitizensunited.org/wp-content/uploads/2023/01/Santos-OCE-Complaint.pdf>; George Santos Hit With 3 New Ethics Complaints Over His Campaign Spending, Fundraising and Financial Disclosure, Insider, Jan. 9, 2023, at <https://www.businessinsider.com/george-santos-ethics-complaints-end-citizens-united-fec-oce-doj-2023-1>.

[62] See, e.g., Nassau County GOP Calls For Santos to Resign, CNN, Jan. 12, 2023, at <https://www.cnn.com/2023/01/11/politics/george-santos-nassau-county-resign/index.html>.

[63] See, e.g., Prosecutors Looking At George Santos Amid Lies, Questions About His Wealth, ABC News, Dec. 28, 2022, at <https://abcnews.go.com/Politics/prosecutors-george-santos-amid-lies-questions-wealth/story?id=95902176>.

[64] See, e.g., New York Rep.-Elect Santos Admits Lying About Career, College, CNBC, Dec. 27, 2022, at <https://www.cnbc.com/2022/12/27/ny-rep-elect-santos-admits-lying-about-career-college.html>.