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SAMPLE — CANDIDATE INTELLIGENCE BRIEF

James R. Whitfield

Candidate Due Diligence — 12th Congressional District Democratic
Primary

SUBJECT	James R. Whitfield (FICTIONAL)
OFFICE SOUGHT	U.S. House, 12th Congressional District (FICTIONAL)
CYCLE	2026 Democratic Primary · SAMPLE
REPORT DATE	April 2026 — SAMPLE
PREPARED BY	DFX Intelligence
CLASSIFICATION	SAMPLE — Marketing Use Only

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This is a SAMPLE document created for demonstration purposes only. All candidate names, donor information, financial figures, and other data are entirely fictional and synthetic. No real individuals, organizations, or campaigns are represented. This document illustrates the format, methodology, and depth of a DFX Intelligence due diligence deliverable.

Executive Summary

SAMPLE DOCUMENT — This report uses entirely fictional / synthetic data to demonstrate DFX Intelligence deliverable format and methodology. "James R. Whitfield" is not a real candidate. No real individuals, donors, or campaigns are represented.

This due diligence brief presents findings from a comprehensive public-records investigation of **James R. Whitfield**, a declared candidate in the **2026 CD-12 Democratic Primary**. All data below is synthetic and illustrative.

Top Findings

#	FINDING	CONFIDENCE	MATERIALITY
1	Whitfield holds \$1.8M in pharmaceutical equities (Pfizer, Merck, AbbVie) per 2025 PFD while serving on state Health & Human Services Committee and co-sponsoring HB-4412 (drug pricing reform)	VERIFIED FACT	5
2	78% of Q1 2026 itemized individual contributions originated outside the district; 41% from the greater New York metro area	VERIFIED FACT	4
3	Campaign manager Linda Ferraro was fined \$12,500 by the State Ethics Commission in 2021 for failure to disclose bundling activity	VERIFIED FACT	4
4	Whitfield's consulting firm, Whitfield Policy Group LLC, billed \$340,000 to Americans for Health Innovation (501(c)(4)) between 2022–2024; the organization endorsed Whitfield in March 2026	ALLEGATION (billing confirmed; quid pro quo inference unverified)	3
5	No civil or criminal litigation found in PACER (all federal districts), state trial court, or state appellate court searches	VERIFIED FACT	1
6	Whitfield served on the board of Keystone Charter Schools Network (2019–2023), which received \$2.1M in state education grants during his state senate tenure	VERIFIED FACT	4

#	FINDING	CONFIDENCE	MATERIALITY
7	PolitiFact rated two Whitfield claims "Mostly False" during 2024 state senate re-election (prescription drug cost claim, jobs creation figure)	VERIFIED FACT	3
8	Former Whitfield Policy Group partner David Chen quoted in <i>District Herald</i> (Nov 2024): "There were misleading investor communications during the Series A process"	ALLEGATION	3
9	FEC filings show \$2,312,881 cycle-to-date receipts; \$1,945,009 cash on hand as of Q1 2026 close	VERIFIED FACT	2
10	Whitfield endorsed by State Teachers' Union, County Democratic Committee, and three sitting state legislators	VERIFIED FACT	2

1. Candidate Profile

Identity & Background

FIELD	DETAIL
Full legal name	James Robert Whitfield
Date of birth	March 14, 1978 (age 48)
Residence	412 Maple Drive, Riverside, CD-12 (since 2009)
Party	Democratic
Current office	State Senator, District 22 (first elected 2016; re-elected 2020, 2024)
Education	B.A. Political Science, University of Virginia (2000); M.P.P., Georgetown University (2003)
Profession	Policy consultant; Founder, Whitfield Policy Group LLC (2010–present)
Family	Married to Dr. Sarah Whitfield (pediatric oncologist, University Medical Center); two children

Career Timeline

PERIOD	ROLE	NOTES
2003–2006	Legislative aide, U.S. Rep. Thomas Carroll (D-CD-12)	Entry-level Hill experience
2006–2010	Senior policy advisor, State Governor's Office	Health policy portfolio
2010–present	Founder & Managing Director, Whitfield Policy Group LLC	Healthcare and education policy consulting; ~\$1.2M annual revenue (est.)
2016–present	State Senator, District 22	Health & Human Services Committee (Vice Chair); Education Committee; Appropriations subcommittee
2019–2023	Board member, Keystone Charter Schools Network	Unpaid; overlaps with legislative tenure
2026	Declared candidate, U.S. House CD-12	Filed January 15, 2026

Entity & Affiliation Map

ENTITY	RELATIONSHIP	STATUS
Whitfield Policy Group LLC	Founder / Managing Director	Active; must be wound down or placed in blind trust if elected
Keystone Charter Schools Network	Former board member	Resigned April 2023
State Health Policy Council	Advisory board	Active (unpaid)
University of Virginia Alumni Assoc.	Lifetime member	Active
Georgetown McCourt School	Adjunct lecturer (2011–2014)	Inactive

2. Donor Overview

FEC Summary — Whitfield for Congress (C00XXXXXX)

METRIC	AMOUNT
Total receipts (cycle)	\$2,312,881
Individual contributions	\$1,876,445
PAC contributions	\$198,200
Candidate self-funding	\$150,000
Other receipts	\$88,236
Total disbursements	\$367,872
Cash on hand (Q1 close)	\$1,945,009

Donor Cluster Analysis

CLUSTER	EST. % OF ITEMIZED	NOTES
Healthcare / pharma professionals	31%	Reflects Whitfield's Health Committee role and spousal network
Out-of-district Democratic donors (NY metro)	24%	Likely Georgetown / UVA alumni network; warrants Schedule A deep-dive
Education sector (teachers' unions, administrators)	18%	Correlates with charter school board tenure and Education Committee seat
In-district small-dollar (< \$200)	15%	Healthy but below median for competitive primaries
Legal / lobbying professionals	12%	Several registered lobbyists among itemized donors

Donor Risk Watchlist

DONOR / GROUP	CONCERN	PRIORITY
Healthcare industry PACs	Conflict with pharma stock holdings	HIGH
Americans for Health Innovation (501(c)(4)) donors	Potential overlap with consulting client	HIGH
NY metro bundlers (identity TBD)	Carpet-bagger / outside money narrative	MEDIUM
Keystone Charter Network affiliates	Grant-related conflict of interest	MEDIUM

3. Legal / Regulatory History

SEARCH	DATABASE	RESULT
Federal civil litigation	PACER (all districts)	No results
Federal criminal records	PACER	No results
State civil litigation	State trial court e-filing	No results
State criminal records	State court records	No results
FEC enforcement (MUR)	FEC MUR search	No results
State Ethics Commission	Public enforcement database	No results against Whitfield personally
SEC enforcement	SEC EDGAR / enforcement releases	No results
LDA registration	Senate LDA database	Whitfield Policy Group not registered (consulting, not lobbying — but warrants scrutiny given government clients)
State lobbying registration	State ethics commission	Not registered

Assessment: Whitfield's personal legal and regulatory record is clean. The risk surface is concentrated in financial disclosure conflicts and staff/associate conduct (Ferraro ethics fine), not personal legal exposure.

4. Business / Ethics / Conflict Review

4.1 Whitfield Policy Group LLC

- Founded 2010; sole-member LLC registered in state
- Estimated \$1.2M annual revenue based on state disclosure and public contract records
- Client list partially disclosed via state ethics filing: includes two hospital systems, one health insurance trade association, and Americans for Health Innovation (501(c)(4))
- **Conflict risk:** Consulting revenue from entities with direct interest in legislation Whitfield sponsors or votes on in the state senate

4.2 Pharmaceutical Stock Holdings

- 2025 PFD discloses:
 - Pfizer Inc. (PFE): \$500K–\$1M
 - Merck & Co. (MRK): \$500K–\$1M
 - AbbVie Inc. (ABBV): \$250K–\$500K

- Johnson & Johnson (JNJ): \$100K–\$250K
- **Total pharma exposure:** \$1.35M–\$2.75M (midpoint ~\$1.8M)
- Whitfield co-sponsored HB-4412 (Prescription Drug Affordability Act) in 2025
- **Conflict risk: HIGH** — Legislative action directly impacts portfolio value

4.3 Keystone Charter Schools Network

- Board service 2019–2023 (overlaps with state senate tenure)
- Network received \$2.1M in state education grants; Whitfield voted on the appropriations subcommittee that funded the grant program
- Resigned from board in April 2023 — timing coincides with early CD-12 exploratory activity
- **Conflict risk: MEDIUM** — No evidence of direct vote-for-grant exchange, but optics are unfavorable

5. Media / Controversy Tracker

#	ITEM	EVIDENCE LEVEL	SOURCE QUALITY	MATERIALITY	DISPOSITION
1	Pharma stock / legislation conflict	VERIFIED FACT	PFD + legislative record	5	Active vulnerability
2	78% out-of-district money	VERIFIED FACT	FEC data	4	Active vulnerability
3	Campaign manager ethics fine	VERIFIED FACT	State Ethics Commission	4	Staff liability
4	501(c)(4) consulting + endorsement	ALLEGATION	Press report + FEC	3	Requires deeper sourcing
5	Charter school grant overlap	VERIFIED FACT	Public records	4	Active vulnerability
6	“Misleading investor communications”	ALLEGATION	Single source (press quote)	3	Monitor; low confidence
7	PolitiFact “Mostly False” ratings (×2)	VERIFIED FACT	PolitiFact	3	Debate / ad ammunition

6. Red / Yellow / Green Flags

Red Flags

FLAG	DETAIL	MATERIALITY
Pharmaceutical stock / legislative conflict	\$1.8M pharma portfolio + Health Committee + drug pricing bill sponsorship	5

Yellow Flags

FLAG	DETAIL	MATERIALITY
Out-of-district donor concentration	78% of itemized from outside CD-12	4
Campaign manager ethics history	Ferraro fined \$12,500 for undisclosed bundling	4
Charter school board / grants overlap	Board service during \$2.1M state grant period	4
501(c)(4) consulting client endorsement	Paid consulting → endorsement pipeline	3
PolitiFact adverse ratings	Two "Mostly False" ratings in prior cycle	3
Former partner allegation	"Misleading investor communications" (single source)	3

Green Flags

FLAG	DETAIL
No personal litigation	Clean PACER, state court, and SEC record
No enforcement actions	No FEC MUR, no state ethics findings against Whitfield personally
Strong fundraising	\$2.3M raised; \$1.9M COH — competitive with field
Broad endorsement coalition	Teachers' union, county party, three legislators
Deep district roots	17-year resident; spouse at local hospital; children in local schools

7. Open Questions for Follow-Up

1. Pull full FEC Schedule A data for itemized donor-level analysis and geographic mapping
 2. Request Whitfield Policy Group client list via FOIA (state contracts) or press inquiry
 3. Investigate Americans for Health Innovation 501(c)(4) Form 990 for Whitfield Policy Group payments
 4. Confirm status of pharma holdings — have any been divested since 2025 PFD?
 5. Interview former Whitfield Policy Group employees / partners (David Chen) for on-the-record statements
 6. Pull Keystone Charter Schools Network 990s for board compensation disclosure
 7. Search state lobbying registration for Whitfield Policy Group employees (may register even if firm does not)
 8. Monitor for updated PFD filing (due May 15, 2026)
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8. Source Log (Abbreviated)

SOURCE	TYPE	CONFIDENCE	ACCESSED
FEC.gov — Whitfield for Congress (C00XXXXXX)	Primary	HIGH	Apr 2026
State Ethics Commission — 2025 PFD	Primary	HIGH	Apr 2026
State Ethics Commission — Enforcement database	Primary	HIGH	Apr 2026
PACER — Federal courts (all districts)	Primary	HIGH	Apr 2026
State trial court e-filing system	Primary	HIGH	Apr 2026
SEC EDGAR — Enforcement releases	Primary	HIGH	Apr 2026
PolitiFact — Whitfield profile	Secondary	HIGH	Apr 2026
<i>District Herald</i> — “Policy Group Faces Questions” (Nov 2024)	Secondary	MEDIUM	Apr 2026
Ballotpedia — James Whitfield	Secondary	HIGH	Apr 2026
OpenSecrets — CD-12 race profile	Secondary	HIGH	Apr 2026
Keystone Charter Schools Network — IRS Form 990 (2019–2023)	Primary	HIGH	Apr 2026

DFX Intelligence — Lawful Public-Records Research Compiled exclusively from publicly available primary and credible secondary sources. Each substantive claim is labeled by confidence and materiality. No private, paywalled, or unlawfully obtained data was used.

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